



City of Danville
Analysis of Impediments to
Fair Housing

Amended May 2012

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Introduction and Purpose:

This document was prepared by the Community Development Division of the Department of Public Development of the City of Danville, Illinois. The City is both committed and obligated to affirmatively further fair housing, that is, to eliminate racial and ethnic segregation, illegal physical and other barriers to persons with disabilities and other discriminatory practices in housing throughout the community. Provisions to affirmatively further fair housing (AFFH) are principal and long-standing components of all the community development programs sponsored and funded by the U.S. Department of Housing and Urban Development (HUD). These provisions are pursuant to Section 808 (e) (5) of the Fair Housing Act which requires the Secretary of HUD to administer the Department’s housing and urban development programs in manners that consistently affirmatively further fair housing. As a HUD grantee, the City of Danville accepts the obligation to affirmatively further fair housing through a wide variety of actions pursuant to these three basic requirements:

1. Conduct an analysis to identify impediments to fair housing choice within the City,
2. Take appropriate action to overcome the effects of any impediments so identified,
3. Maintain records reflecting the analysis and actions taken in this regard.

This analysis of impediments will serve both as a resource to document those areas where improvement is needed to further fair housing choice, and as a planning tool to guide future activities, regulations and the distribution of resources. The body of the analysis is organized into four basic sections:

- Chapter 2 – Legal Requirements
- Chapter 3 – Consultation & Sources
- Chapter 4 – Local Housing Market & Demographics
- Chapter 5 – Impediments to Fair Housing Choice

Purpose:

An Analysis of Impediments to Fair Housing is required by the U.S. Department of Housing and Urban Development (HUD). All units of government that receive funding through Community Development Block Grants (CDBG), HOME Investment Partnership Act, (HOME), Emergency Shelter Grants, (ESG) or Housing Opportunities for Persons with Aids, (HOPWA) are obligated to affirmatively further fair housing. The first step in fulfilling that obligation is to honestly and openly examine the needs and conditions that exist in the grantees jurisdiction, and to describe those conditions within an Analysis of Impediments. The City of Danville receives CDBG funding.



City of Danville

Analysis of Impediments to Fair Housing

Chapter 1: Introduction and Purpose

Fair housing is defined by HUD in 24 CFR 570.904 (c)(1), to be the ability of households with similar financial resources to access the same choices in housing without regard to race, color, disability, familial status or national origin. These are referred to as the “protected classes” for fair housing purposes. Discrimination of persons in these protected classes in the sale or rental of housing, issuance of mortgages and other housing choice related activities is prohibited.

In each Analysis of Impediments the unit of government is expected to identify any conditions that potentially might limit the ability of any person(s) to rent, own, buy or sell housing due to their inclusion in one of the protected classes. Further, it is also incumbent upon the unit of government to develop strategies directed at reducing or eliminating these impediments. HUD defines impediments to fair housing choice as:

1. any actions, omission or decision taken because of race, color, religion, sex, disability, familial status or national origin which restrict housing choices or the availability of housing choices, or
2. any actions, omissions or decision which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status or national origin.



Federal Law

For 102 years the Civil Rights Act of 1866 represented the only federal protection of the rights of racial minorities in the execution of real property agreements. During that time the Act was interpreted only to prohibit racial discrimination in housing by government or public action, and not extending to private transactions. In 1968 the United States Supreme Court ruled that the 1866 Act prohibited all discrimination, private as well as public, in the sale or rental of real property.

That same year fair housing legislation was enacted in Title VIII of the Civil Rights Act of 1968. With the passage of the Fair Housing Act the private housing market in the United States was subject to federal laws prohibiting discrimination for the first time. The new Act prohibited discrimination based on race, color, religion and national origin. Discrimination based on sex was added in 1974. In an amendment in 1988 it was changed to include discrimination against people because of disability and/or because of familial status. The familial status addition had its greatest impact on families with children and for couples not legally married.

The Fair Housing Act is enforced administratively by the U.S. Department of Housing and Urban Development (HUD). Citizens who believe they have been harmed by a violation of the Act may file administrative complaints with HUD and an investigation of the claim will be conducted. The Act also authorizes federal lawsuits by the U.S. Department of Justice as well as private suits filed in federal or state courts by individuals. Depending upon their legislative jurisdiction, some state and local fair housing enforcement agencies also have the authority to investigate violations and bring certain enforcement actions. The general authority for all these enforcement actions is found in the Fair Housing Act.

Where violations of the law are established, remedies under the Fair Housing Act may include the award of compensatory damages to victims of discrimination, possibly numbering in the hundreds of thousands of dollars, orders for comprehensive corrective action, and awards of punitive damages to victims or civil penalties to the government. In design and construction cases, remedies also may require retrofitting houses that have already been constructed to bring them into compliance with the Act's design and construction requirements.

Summary of the Federal Fair Housing Act

The following actions cannot be taken based on race, color, national origin, religion, sex, familial status or disability;

- Refuse to rent or sell housing



- Refuse to negotiate for housing
- Make housing available
- Deny a dwelling
- Set different terms, conditions, or privileges in a housing agreement
- Provide different housing services or facilities
- Falsely deny that housing is available for inspection, sale, or rental
- Persuade owners to sell or rent (blockbusting) or
- Deny anyone access to or membership in a facility or service (such as multiple listing service) related to housing transactions.

In mortgage lending, no one may take any of the following actions based on race, color, national origin, religion, sex, familial status or disability;

- Refuse to make a mortgage loan
- Refuse to provide information regarding loans
- Impose different terms or conditions on a loan, such as different interest rates, points or fees
- Discriminate in appraising property
- Refuse to purchase a loan
- Set different terms or conditions for purchasing a loan.

It is additionally illegal for anyone to;

- Threaten, coerce, intimidate or interfere with anyone exercising a fair housing right or assisting others who exercise that right
- Advertise or make any statement that indicates a limitation or preference based on race, color, national origin, religion, sex, familial status or disability. This prohibition against discriminatory advertising applies to single-family and owner-occupied housing that is otherwise exempt from the Fair Housing Act.

State and Local Laws

States and local governments may also adopt fair housing laws or ordinances. Where those laws are substantially equivalent to the federal law, and where the enforcement agency has been established, HUD can certify the state or local government as a substantially equivalent agency. To receive HUD certification, the local agency must demonstrate capacity to enforce fair housing laws that provide at least the same protections, rights, remedies, and judicial enforcement



procedures as the federal law. After certification, the local agency will receive HUD referrals of fair housing complaints within its jurisdiction for investigation and processing. The State of Illinois is considered to have substantially equivalent fair housing laws and therefore is so certified and receives referrals of fair housing complaints.

State of Illinois Law

The Illinois Human Rights Act prohibits discrimination in real estate transactions. This includes not only refusal to sell or rent, but also discriminatory differences in price and any other terms or conditions of a real estate transaction. The Illinois Human Rights Act prohibits discrimination in housing based upon race, color, religion, sex, national origin, ancestry, age (40 and over), order of protection status, marital status, physical or mental disability, military status, sexual orientation or unfavorable discharge from military service. Of these order of protection status, sexual orientation and military status are relatively new and not altogether known and understood by the public and those in the housing industry.

City of Danville Human Relations Ordinance

The City of Danville prohibits discrimination in housing based upon race, color, religion, national origin, sex, handicap or familial status. The chapter pertaining to fair housing is as follows:

§ 95.20 Real Estate Transactions.

- (A) It shall be an unlawful practice and a violation of this chapter for any real estate broker, real estate salesman or agent licensed by the state, any owner or any other person in the business of selling or renting dwellings or engaging in a real estate transaction:
- (1) To print, circulate, post, mail, issue, display, publish or cause to be printed, circulated, posted, mailed issued, displayed or published any oral or written communication, notice, advertisement, sign, or other writing of any kind relating to the sale, rental or leasing of any housing accommodation in the city which will indicate or express any unlawful discrimination toward any prospective buyer, renter or lessee;
 - (2) To unlawfully discriminate, make any distinction or restriction against the prospective or actual buyer or tenant in the price, terms, conditions or privileges of any kind relating to the sale, rental, lease, or occupancy of any housing



- accommodation in the city or in the furnishing of any facilities or services in connection therewith;
- (3) To refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of, or otherwise make available or deny, a dwelling to any person through unlawful discrimination;
 - (4) To represent to any person through unlawful discrimination that any dwelling is not available for inspection, sale, or rental when such dwelling is in fact so available;
 - (5) To deliberately and knowingly refuse examination of copies of any listing of housing accommodations in the city to any person based on unlawful discrimination;
 - (6) To enter into a listing agreement which prohibits the sale or rental of housing accommodations to any person based upon unlawful discrimination;
 - (7) To deny a person through unlawful discrimination access to or membership or participation in a multiple-listing service, real estate broker's organization or other service, organization, or facility relating to the business of selling real estate or renting dwellings, or to unlawfully discriminate against him or her in the terms or conditions of such access, membership or participation;
 - (8) To solicit an agent to sell any housing accommodation with any limitations on its sale based on unlawful discrimination;
 - (9) To solicit for sale, lease, or listing for sale of lease, any housing accommodations within the city on the ground of loss of value due to the present or prospective entry into any neighborhood of any person or persons of any particular race, color, religion, national origin, sex, handicap or familial status;
 - (10) To make any misrepresentations concerning the listing for sale or the anticipated listing for sale of any housing accommodation for the purpose of inducing or attempting to induce the sale or listing for sale of any housing accommodation by representing that the presence or anticipated presence of a person or persons of any particular race, color, religion, national origin, sex, handicap or familial status in the area will or may result in the lowering of property values in the block, neighborhood, or area in which the property is located;
 - (11) To distribute or cause to be distributed, written material or statements designed to induce any owner of any housing accommodation in the city to sell or lease his or her property because of any present or prospective change in the race,



color, religion, national origin, sex, handicap or familial status of persons in the neighborhood; and

- (12) To act or undertake to act with respect to any housing accommodation whose disposition is prohibited to any person based on unlawful discrimination.
- (B) It shall be an unlawful practice and a violation of this chapter for any person or other entity whose business includes engaging in residential real estate-related transactions to unlawfully discriminate against any person in making available such a transaction, or in the terms or conditions of such a transaction.
 - (1) Residential real estate-related transaction means any of the following:
 - (a) The making or purchasing of loans or providing other financial assistance: for purchasing, constructing, improving, repairing or maintaining a dwelling: or secured by residential real estate.
 - (b) The selling, brokering or appraising of residential real property.
 - (2) Nothing in this division prohibits a person engaged in the business of furnishing appraisals of real property to take into considerations factors other than race, color, religion, national origin, sex, handicap or familial status.
- (C) Handicap. It shall be unlawful and a violation of this chapter:
 - (1) To refuse to sell or rent or to otherwise make unavailable or deny a dwelling to any buyer or renter because of a handicap of that buyer or renter, or handicap of a person residing or intending to reside in such dwelling after it is sold, rented or made available, or a handicap of any person associated with the buyer or renter, and
 - (2) To alter terms, conditions or privileges of sale or rental of a dwelling or the provision of services or facilities on connection with such dwelling because of a person's handicap or a handicap of any person residing or intending to reside in such dwelling after it is sold, rented or made available, or a handicap of any person associated with that person.
 - (3) For purposes of this section, unlawful discrimination includes:
 - (a) A refusal to permit, at the expense of the handicapped person, reasonable modifications of existing premises occupied or be occupied by such person if such modifications may be necessary to afford such person full enjoyment of the premises; except that in the case of a rental, the landlord may, where it is reasonable to do so, condition permission for a modification on the renter agreeing to restore the interior of the premises to the condition that existed before the modifications, reasonable wear and tear excepted. The landlord may



not increase, for handicapped persons, any customarily required security deposit. However, where it is necessary in order to insure with reasonable certainty that funds will be available to pay for the restorations at the end of the tenancy, the landlord may negotiate as part of such a restoration agreement a provision requiring that the tenant pay a reasonable amount of money not to exceed the cost of restorations. The landlord shall keep such money in a separate account and the interest earned on any such account shall accrue to the benefit of the tenant. A landlord may condition permission for a modification on the renter providing a reasonable description of the proposed modifications as well as reasonable assurances that the work will be done in a workmanlike manner and that any required building permits will be obtained;

- (b) A refusal to make reasonable accommodations in rules, policies, practices or services, when such accommodations may be necessary to afford a handicapped person equal opportunity to use and enjoy a dwelling; or
- (c) In connection with the design and construction of covered multifamily dwellings for first occupancy after the effective date of this chapter, to fail to design and construct those dwellings in such a manner that:
 - 1. The dwellings have at least one building entrance on an accessible route, unless it is impractical to do so because of the terrain or unusual characteristics of the site;
 - 2. With respect to dwellings with a building entrance on an accessible route;
 - i. The public use and common use portion of such dwellings are readily accessible to and usable by handicapped persons
 - ii. All the doors designed to allow passage into and within all premises within such dwellings are sufficiently wide to allow passage by handicapped persons in wheelchairs; and
 - iii. All premises within such dwellings contain: an accessible route into and through the dwelling: light switches, electrical outlets, thermostats, and other environmental controls in accessible locations;



reinforcements in bathroom walls to allow later installations of grab bars; and, usable kitchens and bathrooms such that an individual in a wheelchair can maneuver about the space.

- (4) The city may review and adopt procedures for the approval of newly constructed covered multifamily dwellings for the purpose of making determinations as to whether the design and construction requirements of division (B)(3) are met.
- (D) Guide, hearing or support dog. It is unlawful for the owner or agent of any housing accommodation to:
- (1) Refuse to sell or rent after the making of a bona fide offer, or refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny property to any blind, hearing impaired or physically handicapped person because he/she has a guide, hearing or support dog;
 - (2) Discriminate against any blind, hearing impaired or physically handicapped person in the terms, conditions, or privileges of sale or rental property, or in the provision of services or facilities in connection therewith because he or she has a guide, hearing or support dog;
 - (3) Require, because a blind, hearing impaired or physically handicapped person has a guide, hearing or support dog, an extra charge in a lease, rental agreement, or contract of purchase or sale, other than for actual damage done to the premises by the dog.
- (E) Exceptions to §95.20. Nothing in §95.20 shall prohibit:
- (1) Any sale of a single-family dwelling unit buy its owner if all of the following have been met:
 - (a) The owner does not own more than three single-family dwelling units at the time of sale; and such owner does not own any beneficial interest in nor is there owned or reserved in his or her behalf, under any express or voluntary agreement, title to or any right to all or a portion of the proceeds from the sale or rental of more than three single-family dwelling units at any one time;
 - (b) The owner was the last current resident, or in the case of the sale of any such single-family dwelling unit by a private individual owner not residing in such house at the time of sale or who was not the most recent resident



- of such dwelling unit prior to sale, the exemption granted by this division shall apply only with respect to one such sale within any 24 month period;
- (c) The unit was sold without the use in any manner of the sales or rental facilities or services of any real estate broker or salesman or any employee or agent of any real estate broker or salesman; and
 - (d) The unit is sold without the publication, posting of mailing, after notice, of any advertisement or written notice in violation of § 95.20.
 - (e) For purposes of this division, a person shall be deemed to be in the business of selling or renting dwellings if:
 - 1. He or she has, within the previous 12 months, participated as principal in three or more transactions involving the sale or rental of any dwelling or any interest therein; or
 - 2. He or she has, within the previous 12 months, participated as agent, other than in the sale of his or her own personal residence in providing sales or rental facilities or sales or rental facilities or rental services in two or more transactions involving the sale or rental of any dwelling or any interest therein; or
 - 3. He or she is the owner of any dwelling designed or intended for occupancy by, or occupied by, five or more families.
 - (2) Rental of a housing accommodation in a building which contains housing accommodations for not more than four families living independently of each other if the lessor resides in one of the housing accommodations;
 - (3) A religious organization, association or society, or any nonprofit institution or organization operated, supervised or controlled by or in conjunction with a religious organization, association or society from limiting the sale, rental or occupancy of a dwelling which it owns or operates for other than a commercial purpose to persons of the same religion, or from giving preference to such persons, unless such membership in such religion is restricted on account of race, color, or national origin. Nor shall anything in this section prohibit a private club nor in fact open to the public, which, incident to its primary purpose or purposes provides lodgings which it owns or operates for other than a commercial purpose, from limiting the rental or occupancy of such lodgings to its members or from giving preference to its members; or;
 - (4) Conduct against a person because such person has been convicted by any court of competent jurisdiction of the illegal manufacture of a controlled substance as defined in the Federal Controlled substances Act;



(5) No provision in this section regarding familial status shall apply with respect to housing for older persons.

(a) Housing for older persons means housing;

1. Provided under any state or federal program that the Department determines is specifically designed and operated to assist elderly persons; or

2. Intended for and solely occupied by persons 62 years of age or older; or

3. Intended and operated for occupancy by at least one person 55 years of age or older per unit. In determining whether housing qualifies as housing for older persons under this division, the Department shall develop regulations which require at least the following;

i. The existence of significant facilities and services specifically designed to meet the physical or social needs of older persons, or if the provision of such facilities and services is not practicable, that such housing is necessary to provide important housing opportunities for older persons; and

ii. That at least 80% of the units are occupied by at least one person 55 years of age or older per unit; and

iii. The publication of, and adherence to, policies and procedures which demonstrate an intent by the owner or manager to provide housing for persons 55 years of age or older.

(b) Housing shall not fail to meet requirements for housing for older persons by reason of;

1. Persons residing in such housing as of the effective date of this chapter who do not meet the requirements of divisions (E) (5) (a)2 or 3; provided that new occupants of such housing meet the age requirements of (E)(5)(a) 2 or 3 above.



City of Danville

Analysis of Impediments to Fair Housing

Chapter 3: Consultation and Sources

Consultation

This Analysis of Impediments to Fair Housing was conducted by the staff of the City of Danville Department of Public Development. Contributing to the process were John Dreher, Community Development Manager; Christopher Milliken, Planning & Zoning Manager; and Angie Stenson Danville Area Transportation Study Planner. Sandra Houston, Human Relations Manager in the City Personnel Department also contributed.

Representatives of thirty-two governmental, community service, health care, industrial, financial and economic development agencies participate in all Community Development Planning processes, organized in specific workgroups to address topics, make needs determinations and set goals and strategies for Danville Community Development. These same partners contributed data, ideas, experiences and interviews as part of this Analysis. These agencies and their members are listed below.

Vicki Haugen, Vermilion Advantage Economic Development Corp.

Betty Seidel, Substance Abuse Treatment Professional

Phearn Butler, East Central Illinois Community Action Agency

Trustee Nancy O’Kane, Danville Township

Brian Hensgen, Vermilion County Workforce Investment Board

Jim Mulvaney, Vermilion County Community Development Corporation

Greg Hilleary, Director, Danville Housing Authority

Muriel Barnes, Center for Children’s Services

Sharon Sawka, Salvation Army

Thom Pollock, Crosspoint Human Services, Your Family Resource Connection & West Downtown Neighborhood Assn.

Ted Parker, Danville Rescue Mission

Michael Rohall, Remax Realty

Mark Gould, Old National Bank



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Chapter 3: Consultation and Sources

Linda Bolton, Vermilion Advantage Economic Development Corporation

Pat Tarr, Faith In Action

Shirlee Fraley, Stone Arch Bridge Neighborhood Association

Dee Ann Ryan, Mental Health 708 Board

Amy Marchant, CRIS Senior Services

Susan Perkins, Prairie Center Substance Abuse Treatment Center

Cathy Richard, HALO Project

Debbie Clapper, Danville School District #118

Todd Lee, Danville Sanitary District

Dana Schaumberg, Downtown Danville, Inc.

John Heckler, Director, Department Public Development

Jim Mulvaney, Vermilion County Community Development Corp. and First Financial Bank

Kathy Leary, Central Illinois Debt Management & Credit Education, Inc.

Debbie Borgwald, Danville Area Board of Realtors

John Cunningham, President, Danville Area Landlords Association

a. Danville Area Transportation Study – The Metropolitan Planning Organization for the greater Danville area

b. CRIS Senior Services – United Way agency specializing in services to senior citizens and providing transportation for the mobility-impaired

c. Crosspoint Human Services – Multi-faceted not-for-profit serving persons with mental health challenges, developmental disabilities and physical impairments

d. Central Illinois Debt Management & Credit Education, Inc. – Debt management and credit recovery counseling and education



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Analysis of Impediments to Fair Housing

Chapter 3: Consultation and Sources

e. Danville Department of Public Development – City’s managing department for planning, zoning, land use, community development, construction and property maintenance code enforcement

f. Danville Area Landlords Association – local association of investor-owners who meet monthly to discuss the rental housing business and exchange ideas

g. Danville Housing Authority – managing agency for all publicly-owned housing facilities within the City of Danville

h. Danville Human Relations Commission – City supported citizen commission addressing human and civil rights issues

i. Danville Police Department – City’s full-time professional police force

j. Danville School District #118 – public school system for the entire city and some portions of the surrounding area

k. Downtown Danville, Inc. – A not-for-profit corporation dedicated to the revitalization of the traditional downtown area

l. East Central Illinois Community Action Agency – CAP agency serving Vermilion, Iroquois, Ford and Edgar Counties with Headstart, Home Weatherization, Energy Assistance and other low-income resident services

m. Faith in Action – Organization financed by a consortium of faith-based groups providing emergency home repairs for senior citizens

n. HALO Project - Special unit of the USMC Health Care Foundation which conducts public education and volunteer programs aimed at a “Healthy Community” concept

o. Danville Area Board of Realtors – local realtors association and multiple listing service

p. Stone Arch Bridge Neighborhood Association – Neighborhood Association bounded by East Main Street, Stoney Creek, Brian Street and College Streets in the area traditionally known as “Rabbittown” in Danville south-central area

q. Vermilion Advantage Economic Development Crop – Combination of a vigorous Economic Development board and staff and area Chamber of Commerce



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Chapter 3: Consultation and Sources

- r. **Vermilion County Community Development Corp.** – Association of local banks that formulates creative financing of community development projects, often pursuant to the Community Reinvestment Act.
- s. **Vermilion County Mental Health 708 Board** – Body commissioned by the County Board to dispense funding to providers of mental health care, services and support
- t. **West Downtown Neighborhood Association** – Neighborhood Association bounded by North Street on the south, Vermilion Street on the east, Williams Street on the north and Gilbert Street on the west
- u. **Vermilion County Workforce Investment Board** – Public/private consortium working to coordinate job opportunities and employers needs with unemployed persons’ abilities
- v. **Your Family Resource Center** – Homeless sheltering for women, women with children, counseling and supportive services for victims of domestic violence
- w. **Danville First Financial National Bank** – Full service bank and member of the Vermilion County Community Development Corporation
- x. **Old National Bank** - Full service bank and member of the Vermilion County Community Development Corporation
- y. **Center for Children’s Services** – Not-for-profit serving the needs of minors and families with children
- z. **Remax Realty** – Local Realtor
- aa. **Salvation Army** – Agency providing assistance with shelter, clothing and utilities
- bb. **Danville Area Rescue Mission** – Emergency homeless shelter for men
- cc. **Prairie Center** – Substance Abuse Treatment Center

Sources

Specific data and information sources used in the development of this Analysis include the following:



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Chapter 3: Consultation and Sources

U.S. Census 1990

U.S. Census 2000

Danville Community Development's 2008-2010 Foreclosure Study

Danville Department of Public Development's 2000 and 2006 Structural Conditions Survey

U.S. Department of Housing & Urban Development's Fair Housing Planning Guide

Home Mortgage Disclosure Act Data MSA/MD 19180

Danville Department of Public Development's July 2010 Local Housing Advertisement Study

"Real Estate for Sale" August and September editions by Young Publications

Crosspoint Human Services Housing Plan, 2003

Chapter 95, Danville Code of Ordinances, Human Relations, 95.20 – Real Estate Transactions

Danville Area Transportation Study Data

Vermilion County Mental Health 708 Board Annual Report 2008-2009

Danville City's "A Guide to Landlord/Tenant Relations", Third Edition

Housing Needs Assessment Study of Danville, Illinois*

*The Housing Needs Assessment Study of Danville, Illinois was released in April 2011. It was compiled by American Marketing Services, Inc. of Chicago on behalf of the Danville Housing Authority. This document is cautiously recognized for some of its content data, but the City finds many of its conclusions of no value.

Of major concern, under "Condition of Danville Housing Stock" on page 27, the study misinterprets the City's Structural Conditions Survey. The study claims that each of the three levels of condition other than "good" indicate some level of deficiency. This is not the case. The survey levels of "good" and "fair" both denote acceptable condition, and the "fair" rating does not indicate housing code deficiency as the study claims. Because of this misinterpretation the study has mistakenly thrown 65% of the City's housing structures into a code deficient status



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Chapter 3: Consultation and Sources

that is undeserved. As a result, a number of subsequent conclusions found in Chapter IV, C, Demand Analysis are defective.

Furthermore, under “Family Tax Credit Housing Supply”, page 46, paragraph 1, the study claims there is a deficit of 1,068 Family Housing Tax Credit units. Justification is offered in paragraph 2 of page 46; *“New tax credit family rental units would be very competitive in the Danville market, given that the majority of the city’s rental housing stock is older, and in many cases of poor quality.”* This again appears to be based on the misinterpretation of housing condition data.

Also of concern, on page 45, paragraph 1, the study claims as follows: *“As a result, the 1,149 units in professionally managed properties and smaller buildings that work with Section 8 offer a good approximation of the supply of quality affordable housing in Danville.”* This assumption discounts the 4,918 remaining rental residential units in the City, counting not one of them as affordable and of fit quality! This is not a reasonable conclusion, and no supporting data was cited.

In addition, these conclusions were drawn without American Marketing Services, Inc. personnel consulting with any of the City’s inspectors. City personnel have a great deal of information regarding the housing supply and condition, which is vital to an accurate analysis. Danville employs a full-time inspector just for rental housing, yet he was never contacted nor interviewed by anyone affiliated with AMS during the Study’s development. The two full-time Environmental/Housing Code Inspectors, the Code Enforcement Manager, the Building Inspector, the Planning & Zoning Manager and the Director of Public Development all confirm that no one from AMS contacted, interviewed nor requested data from any of them.

The study also opines that there is a deficit of 308 units of Subsidized Senior Housing in Danville. Yet for now the third consecutive year the three largest developments of subsidized senior housing, Woolford (100 units), Immanuel Senior (50 units) and Vermilion House (160 units), advertise in the Commercial News regularly for applicants, frequently offering special incentives to attract new tenants. For example, on September 1, 2011 all three developments had classified ads published for new applicants. This information and action from the developments indicate a market not in need of additional subsidized senior housing.

The report notes that all demographic data have been obtained from Nielsen Claritas. It is important to recognize that all 2010 data in the report are estimates and not actual counts from the 2010 Census. Projections for 2015 were developed from these estimates. This was the information available at the time of the report, but now 2010 Census counts are available for analysis and the census counts don’t confirm the estimates.



On page 22, the report gives a projection for total housing units in Danville and in Vermilion County from 2010 to 2015. It projects a 3.7% decline of housing units for Danville and a 2.9% decline for Vermilion County between 2010 and 2015. This represents the loss of 539 units in Danville and 1,048 units in Vermilion County. As mentioned earlier, these numbers are based on numbers from the 2000 Census estimated to 2010 and then projected to 2015. The real counts from the 2010 Census show a decline of only 167 units in the ten year period between Census counts. This is a change of just over -1%. Vermilion County housing unit counts declined by only 31 between the 2000 Census and 2010 Census. This represents a change of -0.0008% over a ten year period. Now that the real count of housing units from the 2010 Census is available, the data show it is unreasonable and unrealistic to project a 3.7% and a 2.9% decline in housing units between 2010 and 2015 for Danville and Vermilion County, respectively. Recommendations based on these overestimated projections are not relevant to the housing needs of the area.

The study used available income data (2010 estimates and 2015 projections) to correspond to the need for increased affordable housing units (page 53 and 54). The conclusions from the demographic section of the report; however, show an estimated increase in median household income, a decline in households earning less than \$25,000, and a decline in seniors with incomes below \$25,000. This is a case in which the Study's conclusions did not fully consider the balance of what data indicated. These are some of the demographic conclusions from the report:

- On page 11 the report states data from Nielsen Claritas show that, *“Over the next five years the median household income in Danville is projected to increase by 3.8%, to \$35,367. In Vermilion County overall, the median income is expected to rise 4.9%, \$42,190 in 2015.”*
- On page 12 data show that, *“The number of city households earning less than \$25,000 will decline by 316 (6.8%), to 4,318, while those earning under \$15,000 will decline by 316 (6.8%), to 2,524 households. Households in the \$25,000 to \$49,999 range are projected to fall by 198 (4.9%), to 3,863.”*
- Regarding senior (65+) household income distribution on page 14, the demographic estimates conclude: *“Between 2010 and 2015, the actual number of senior (65+) households in Danville with incomes below \$25,000 is expected to fall by 87 (5.2%), from 1,687 to 1,599. The number of senior households with incomes in the \$25,000 to \$49,999 range will be essentially unchanged at 1,205, while those earning more than \$50,000 will rise by 62 (11.4%), to 800.”*

These projections are at odds with the Study's conclusions concerning future housing demand.



City of Danville

Analysis of Impediments to Fair Housing

Chapter 3: Consultation and Sources

This is a summary of the major areas in which we consider the Study to be fatally flawed. The City of Danville does not regard the Housing Needs Assessment Study of April 2011 as a reliable evaluation of the City's housing situation.

This document was compiled by the staff of the Community Development Division of the Danville Department of Public Development. Direct all requests for copies, questions or comments to:

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City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics

A. Population Distribution

A calculation of population density throughout the City of Danville indicates variations in population concentration and can be seen in the attached map: “Population Density by Census Block” which appears as the second page of this Chapter. Southeastern and west central portions of the city hold the higher residential densities. In general, population density decreases at and around the corporate boundaries and through a central corridor running from south-southwest to north-northeast. That low density divide is primarily a railroad and waterway corridor containing more industrial and commercial properties than residential neighborhoods.

B. Population and Household Characteristics

Overall Population and Number of Households

The population of the City of Danville remained steady between the 1990 and 2000 Censuses, (see table below), during which the population showed a minor increase of 0.2 percent. In the same time period, the total number of households decreased by 3.36 percent and the total population in households decreased by 5.32 percent. This contradiction between the two population growth rates suggests an increase in population living in group quarters. The State of Illinois’ percent change for population, population in households, and total households increased at 8.65 percent, 8.56 percent, and 9.27 percent, respectively. These two population groups experienced opposite population and household trends between 1990 and 2000. We anxiously await the results of the 2010 census as the next best instrument by which to understand the needs of the people we serve.

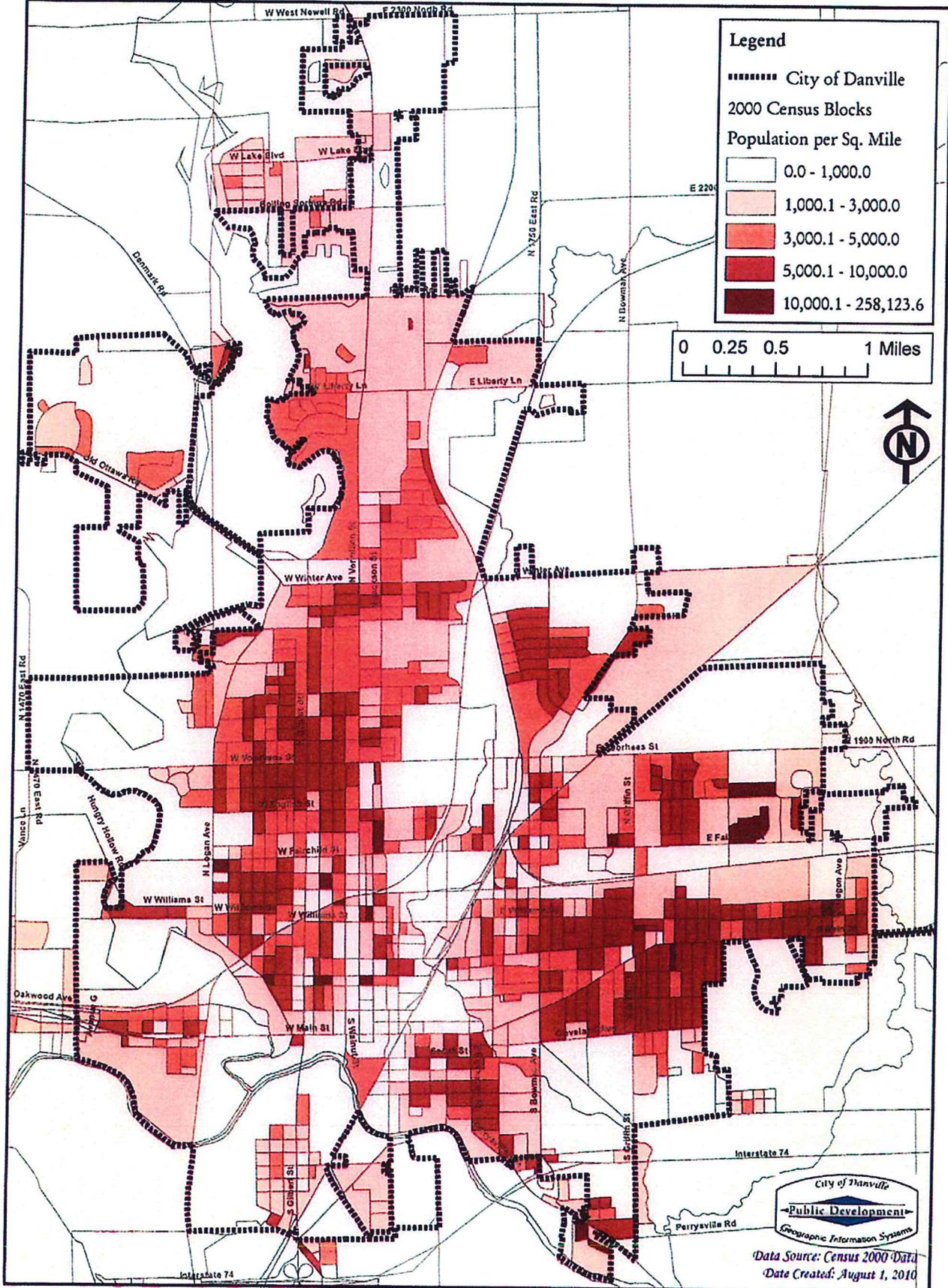
In addition to this decline in the number of persons in households, the average household size in the City of Danville declined between 1950 and 2000. The 2000 Census lists the average household size for the City of Danville at 2.35. Reference the map labeled: “Average Household Size” to see averages by block group.

Changes in Population and Households

	2000		1990		% Change	
	City of Danville	State of IL	City of Danville	State of IL	City of Danville	State of IL
Total Population	33,904	12,419,293	33,828	11,430,602	0.22%	8.65%
Population in Households	31,382	12,097,512	33,147	11,143,646	-5.32%	8.56%
Total Households	13,327	4,591,779	13,791	4,202,240	-3.36%	9.27%

Source: Census Bureau 1990 and 2000 Summary File 1

City of Danville Population Density by Census Block





City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics

“Population Density by Census Block”



City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics



C. Protected and Priority Classes

1. Race Distribution

This section addresses the protected classes in an attempt to understand the specific challenges of people within the City of Danville potentially affected by a lack of fair housing choices which may be driven by racial or ethnic considerations. The 2000 Census collected data on race in the following categories: white, black, American Indian and Alaska Native, Asian, Native Hawaiian and Pacific Islander, some other race, and two or more categories. The table below lists the number of people in each category from the 2000 Census and compares the racial percentages of the total population to that of the State of Illinois' percentages. The City of Danville population consists of approximately 70.2 percent white, 24.4 percent black, 2.1 percent other, and 1.2 percent Asian, etc. as listed in the table. The percentage of minorities in the City of Danville is slightly higher than that of Illinois. Please reference the map "% Minority Population by Census Block" for location distribution of minorities. This map clearly shows that high minority populations are somewhat scattered through the portion of the City in Danville Township (south of Voorhees Street), but there are only two Census Blocks in Newell Township, (north of Voorhees Street), with predominantly racial minority populations. Of those two Census Blocks, the one on the east side of the City and commencing just north of Voorhees Street contains Danville's largest Public Housing complex, and as such carries a disproportionately high minority population. The one on the west edge of the City directly north of Voorhees Street contains only one household, a racial minority family. What this then tells us is that the portion of the City north of Voorhees Street is "whiter" than the City overall and the opposite is true of the portion of the City south of Voorhees Street. This analysis will later examine this geographical division from both housing value and housing condition perspectives, with predictable results.

Census 2000 Race Distribution

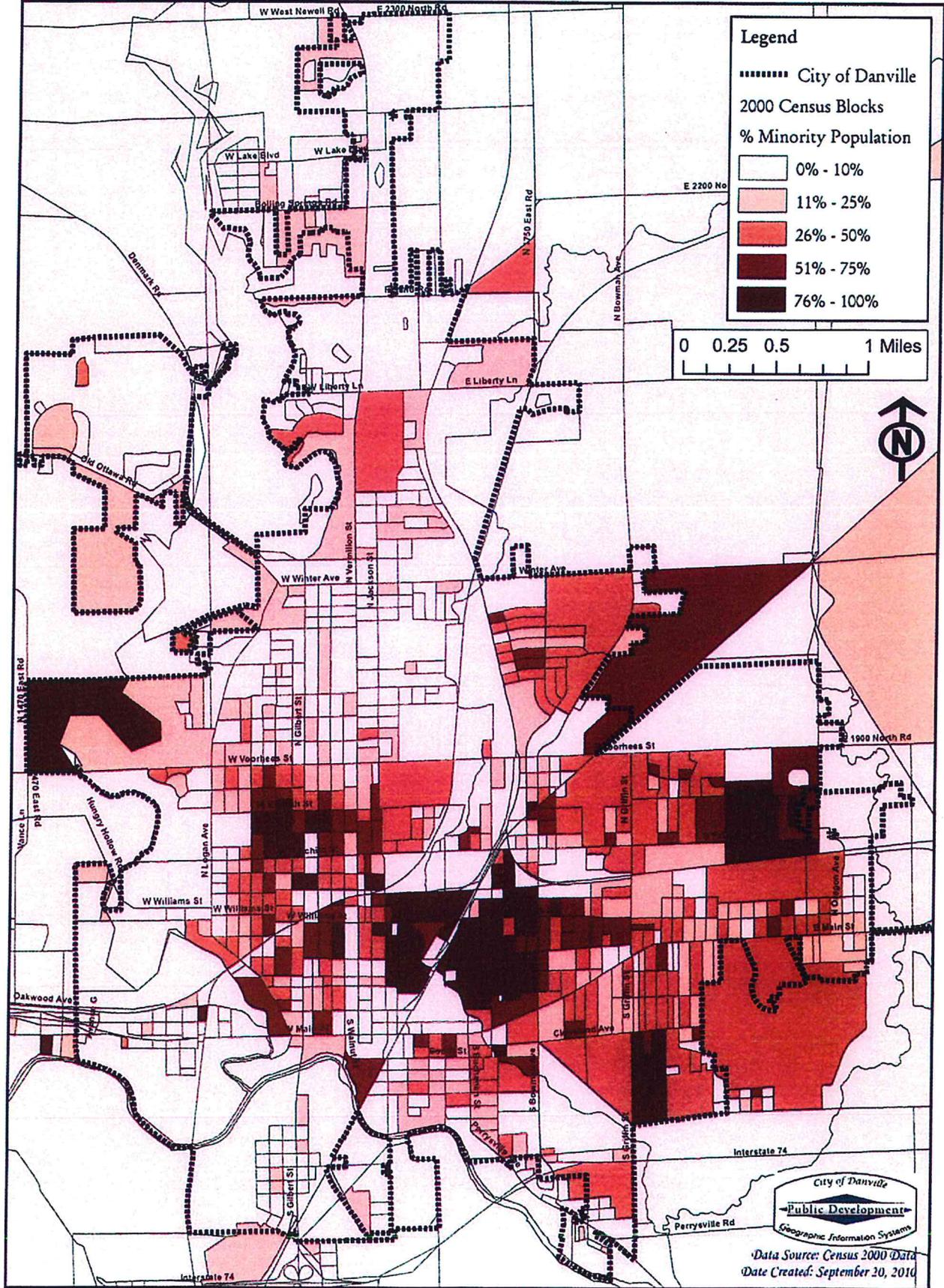
	Total Number	% of Total Population	% State of IL Pop.
Total Population	33,904		12,419,293
White	23,796	70.19%	73.48%
Black or African American	8,261	24.37%	15.11%
American Indian/Alaskan Native	72	0.21%	0.25%
Asian	406	1.20%	3.41%
Native Hawaiian/Other Pacific Islander	10	0.03%	0.04%
Other	708	2.09%	5.82%
Two or more races	651	1.92%	1.89%



City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics

City of Danville
 % Minority Population by Census Block





City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics



City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics

2. Foreign Born Population Data

The foreign born population in the City of Danville is 2.86 percent of the total population from the 2000 Census. This is substantially less than the State of Illinois' 12.31 percent foreign born population. The City of Danville's foreign born population in 2000 was 120% of the same population in 1990. An increase of 528 people to the foreign born population during that period in which the total population increased by only .2% makes this another category worth watching and monitoring. "Recent immigrants" who have entered the country in the previous five years are at particular risk for housing discrimination due to lack of familiarity with the language, local housing market and housing rights. Less than one percent of the City of Danville's population entered the country between 1995 and 2000, and the number since 2000 has not yet been determined.

Foreign Born Population and Comparison

	City of Danville	State of Illinois
2000 Total Population*	33,865	12,419,293
2000 Foreign Born Population	967	1,529,058
% of 2000 Population	2.86%	12.31%
1990 Foreign Born Population	439	952,272
% Change 1990-2000	120.27%	60.57%
Foreign Born Population with year of entry 1995-2000	242	391,875
% of 2000 Population	0.71%	3.16%

**2000 Census Summary file 3*

3. Age Distribution

The age of the population has implications for special services and housing choices. The over 60 age group faces potential hardships in housing choices due to the cost burden. The table below indicates five year age groups of the population in the City of Danville according to the 2000 Census. These data indicate 21 percent of the population over 60 years of age. Please reference the map: "Percentage of the Population over 60 by Census Block" for the locations of concentrations of people over 60. The map does not appear to indicate disproportionate distribution of the elderly.



City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics

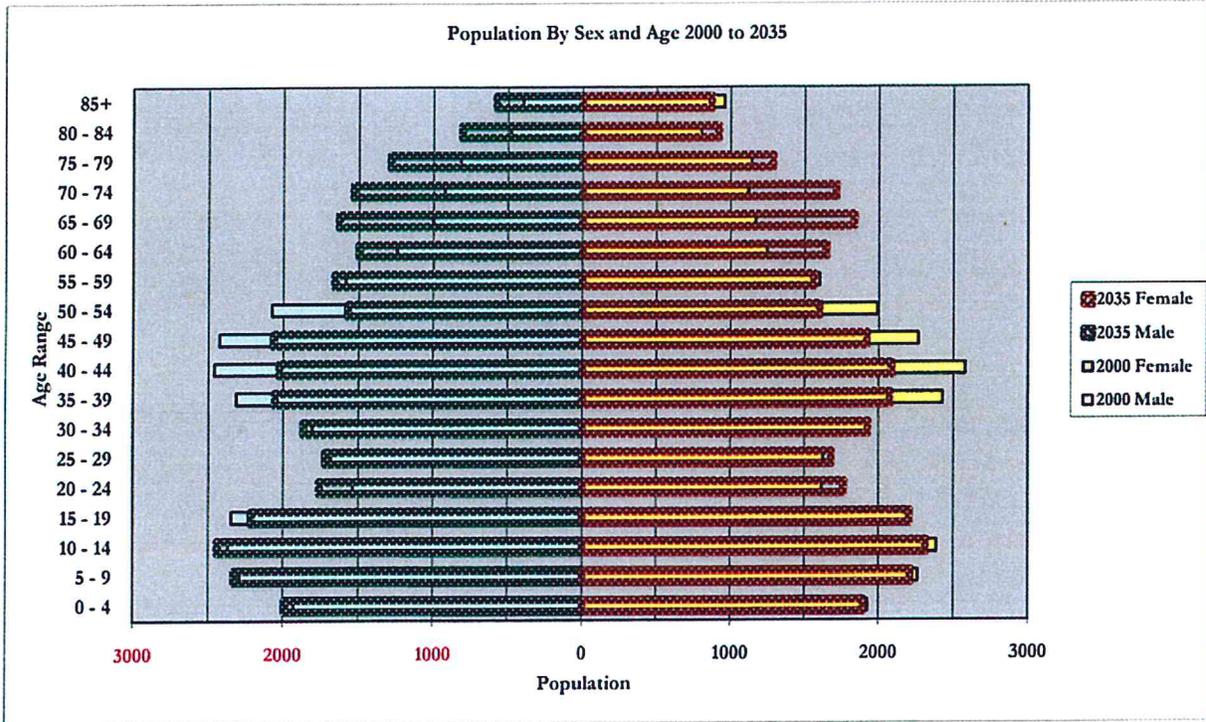
Total Population	33,904	% of Total Population
Under 5	2,403	7.09%
5 to 9	2,404	7.09%
10 to 14	2,295	6.77%
15 to 19	2,233	6.59%
20 to 24	2,299	6.78%
25 to 29	2,408	7.10%
30 to 34	2,206	6.51%
35 to 39	2,382	7.03%
40 to 44	2,397	7.07%
45 to 49	2,316	6.83%
50 to 54	1,997	5.89%
55 to 59	1,553	4.58%
60 to 64	1,369	4.04%
65 to 69	1,356	4.00%
70 to 74	1,334	3.93%
75 to 79	1,323	3.90%
80 to 84	832	2.45%
over 85	797	2.35%

The Illinois Department on Aging projects the population over 60 as continuing to grow in the next decades. The Danville Area Transportation Study (DATS) also projects this for the Danville Urbanized Area (please see chart below). The population pyramid chart below shows the estimated growth in the senior population over 60 in the next 25 years. Notice the symmetrical movement of both genders from the 39-55 age groups into the 55-85 range.



City of Danville

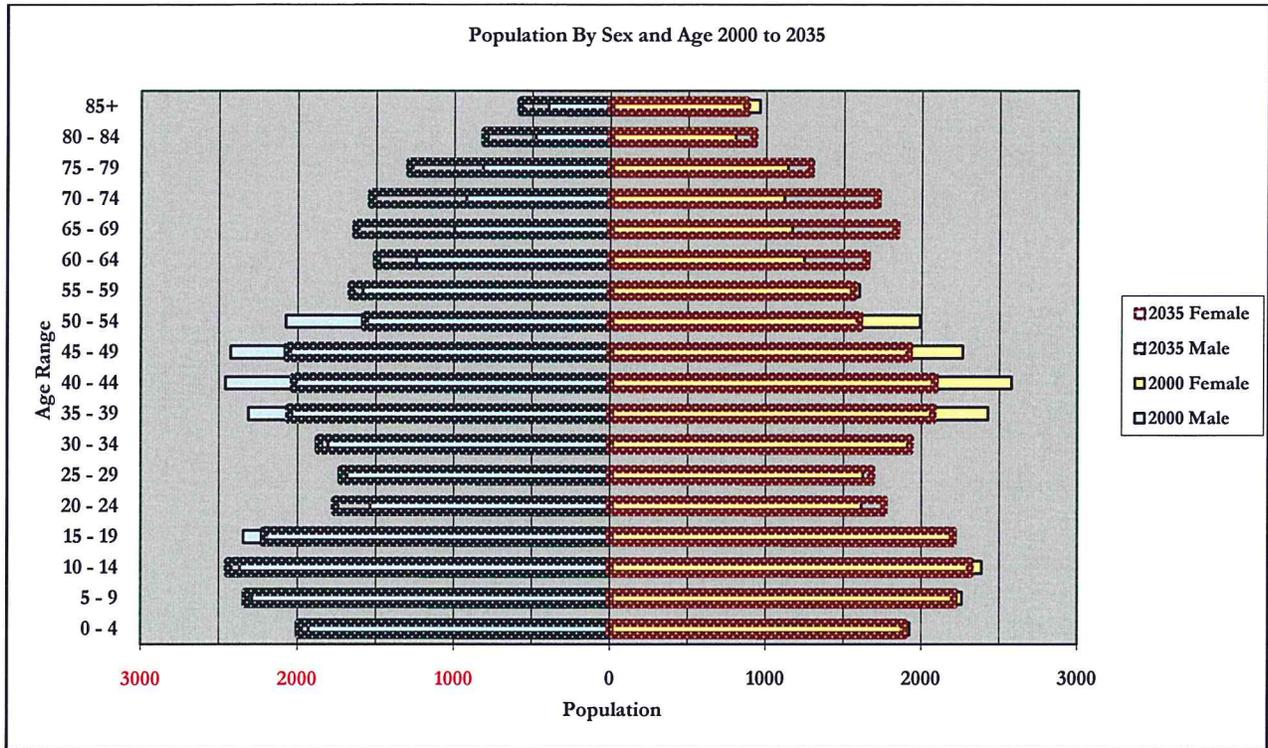
Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics



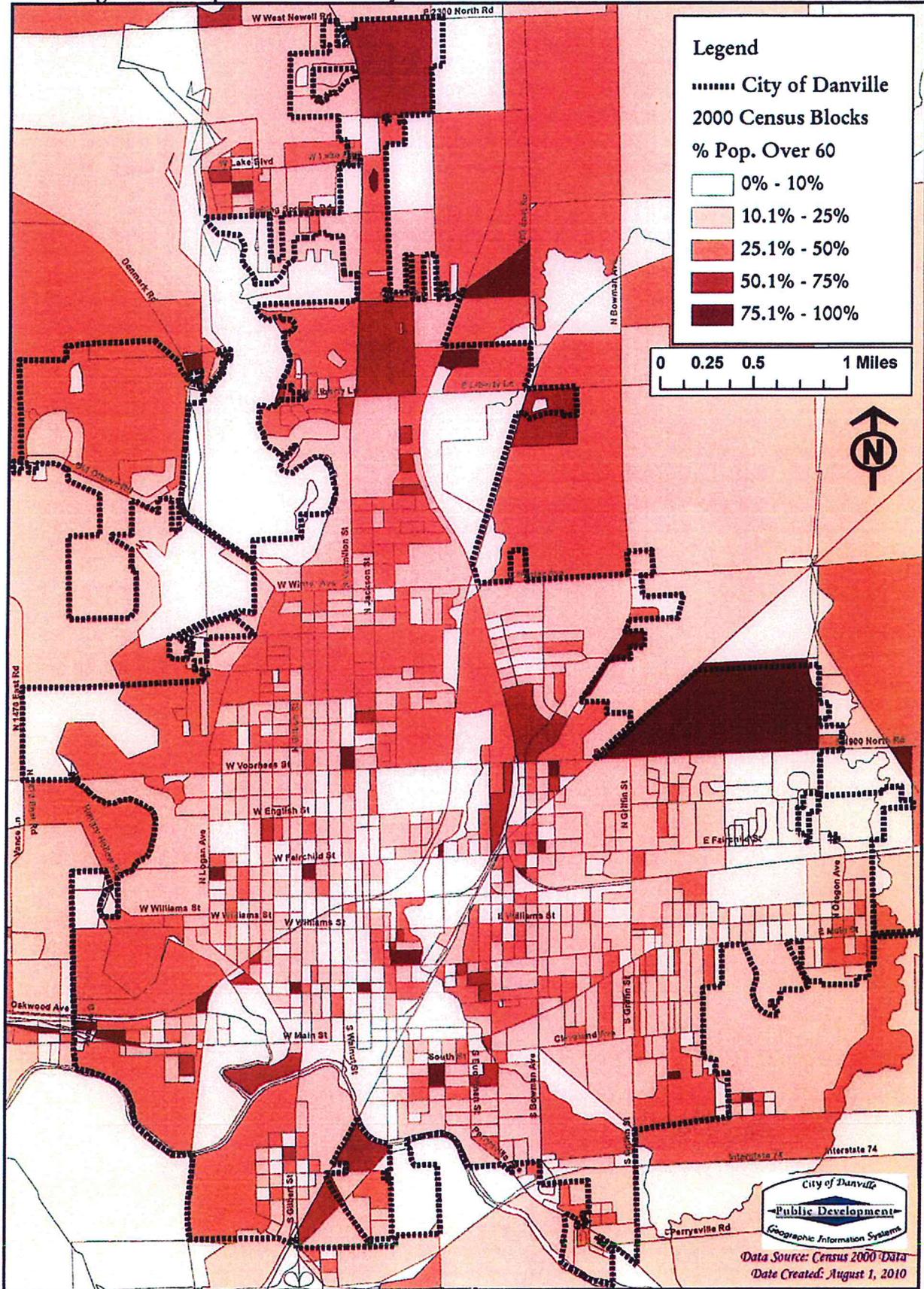


City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics



City of Danville
 Percentage of the Population over 60 by Census Block





City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics



City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics

4. Households with People under 18 and Female Householders

Household data indicate the number of people living in households who are under age 18. The 2000 Census also indicates households with people under 18 with female householders. Data show the City of Danville with 11.37 percent of its total households with a female householder with one or more people under 18. In addition, 35.67 percent of households with one or more people under 18 have a female householder in the City of Danville. This is substantially higher than the State of Illinois' figure of 22.8 percent. Reference the map: “% of Female Head of Household” for locations of concentrations of this population group by Census block. The unique needs and vulnerabilities of female headed households is addressed later in this Analysis as a population in growth and at risk of limited housing choices.

Data for Households with People under 18 and Female Householders

	City of Danville	State of IL
Total Households	13,327	4,591,779
Households with one or more people under 18	4,247	1,663,878
Total households with one or more people under 18, Female householder (no husband present)	1,515	379,406
Households with one or more people under 18, Family HH, Female householder	1,490	375,504
Households with one or more people under 18, Non-family HH, Female householder	25	3,902
% of TOTAL households with one or more people under 18 and Female householder	11.37%	8.26%
% of households with one or more people under 18 with Female householder	35.67%	22.80%

Source: 2000 Census Bureau Summary File 1

5. Analysis of Poverty Status

Monitoring the limited income households in all population groups is important due to income significantly affecting housing choices and locations. The population for whom poverty status is determined according to 1999 income levels is 18.07 percent for the City of Danville and 10.68 percent for the State of Illinois. The proceeding table provides percentages that show which groups make up the population below poverty level. Under the age category, note that over 9 percent of those below poverty level are over 65 for both the City of Danville and Illinois. The race category indicates that nearly 51 percent of those below poverty level are white and 42 percent are black. Both of these percentages are higher than Illinois' percentages. Lastly, the ethnicity category shows that of those below the poverty level in the City of Danville, about 7 percent are Hispanic. Reference the map: “% Below Poverty Level by Block Group” for poverty level concentration data. According to this map, the percentage of those below the poverty level is greater in the block groups in the south central and eastern portions of the city. The map titled: “Median Household Income” reiterates the spatial representation of areas dominated by low income residents. It is no surprise that the south-central portion of the City we refer to as the Jackson-Bowman Corridor has the lowest median income and once again, the clear delineation at Voorhees Street is again obvious.

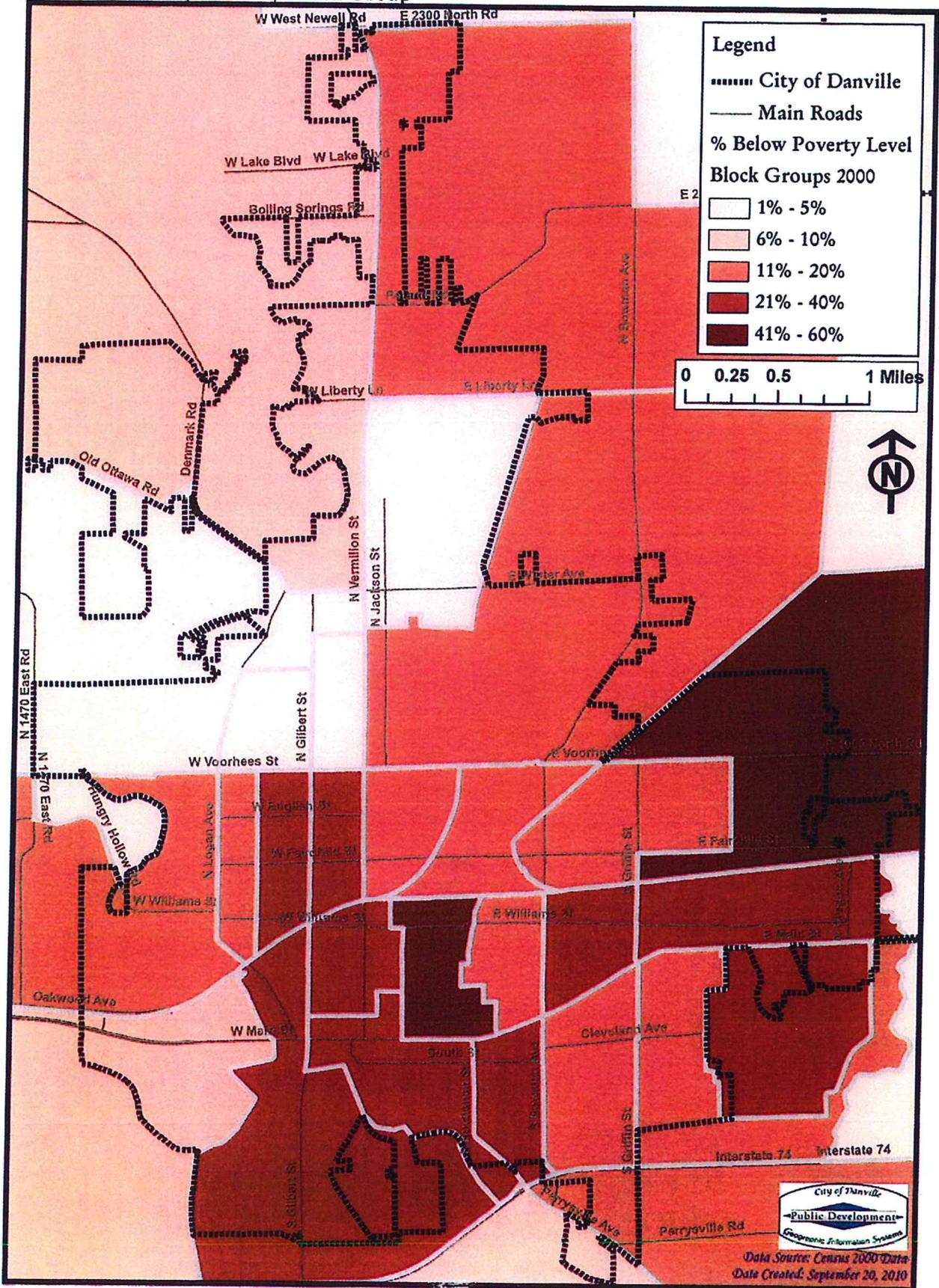


City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics

	City of Danville		State of Illinois	
Population for whom poverty status is determined: Total	31,341		12,095,961	
Population for whom poverty status is determined: Income in 1999 below poverty level	5,662	18.07%	1,291,958	10.68%
Age	Population below poverty level %		Population below poverty level %	
	Number	by category	Number	by category
Population for whom poverty status is determined: Income in 1999 below poverty level; under 18 years	2,217	39.16%	456,901	35.37%
Population for whom poverty status is determined: Income in 1999 below poverty level; 18 to 64 years	2,891	51.06%	717,126	55.51%
Population for whom poverty status is determined: Income in 1999 below poverty level; over 65 years	554	9.78%	117,931	9.13%
	100.00%		100.00%	
Race	Population below poverty level %		Population below poverty level %	
	Number	by category	Number	by category
White alone population for whom poverty status is determined: Income in 1999 below poverty level	2,883	50.92%	618,955	47.91%
Black or African American alone population for whom poverty status is determined: Income in 1999 below poverty level	2,384	42.11%	462,799	35.82%
American Indian and Alaska Native alone population for whom poverty status is determined: Income in 1999 below poverty level	20	0.35%	5,239	0.41%
Asian alone population for whom poverty status is determined: Income in 1999 below poverty level	14	0.25%	39,930	3.09%
Native Hawaiian and Other Pacific Islander alone population for whom poverty status is determined: Income in 1999 below poverty level	0	0.00%	456	0.04%
Some other race alone population for whom poverty status is determined: Income in 1999 below poverty level	151	2.67%	126,680	9.81%
Two or more races population for whom poverty status is determined: Income in 1999 below poverty level	210	3.71%	37,899	2.93%
	100.00%		100.00%	
Ethnicity	Population below poverty level %		Population below poverty level %	
	Number	by category	Number	by category
Hispanic or Latino population for whom poverty status is determined: Income in 1999 below poverty level	420	7.42%	248,402	19.23%

**City of Danville:
% Below Poverty Level by Block Group**

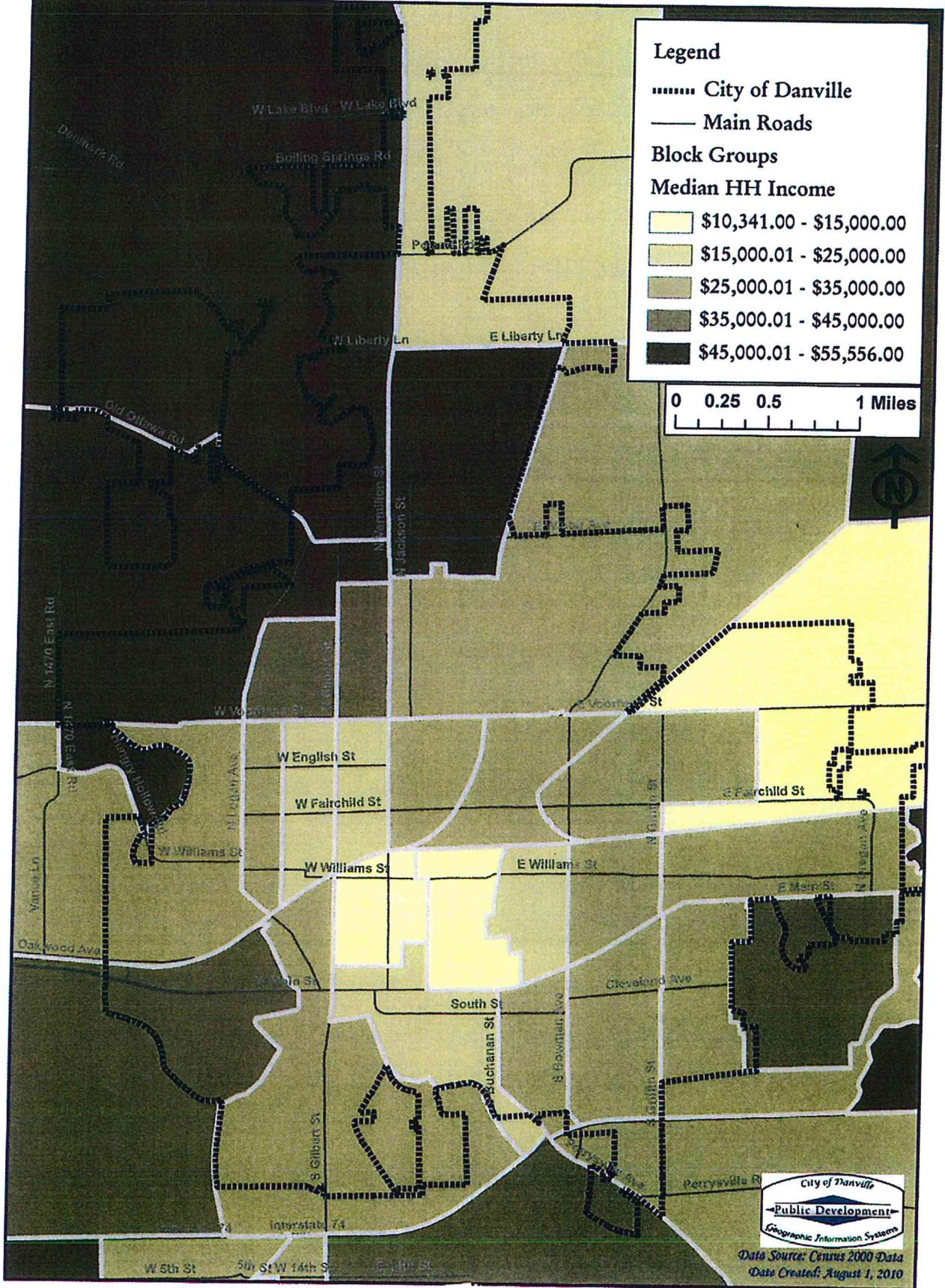




City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics

**City of Danville:
Median Household Income**





City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics



City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics

6. Educational Achievement

Although education status is not included in a priority or protected class, examining it adds to the demographic analysis for understanding the City of Danville's population groups. Two maps illustrate location concentrations of population groups based on education achievement: "Percentage of Population Over 25 with No High School Diploma or Equivalent" and "Percentage of Population Over 25 with Any Post-High School Degree". The "No High School Diploma" map illustrates higher percentages of block group population without a high school diploma in the central and south central portions of the city. On the other hand, the block groups making up the northwestern portion of the city have a lower percentage of population without a high school diploma. The "Any Post-High School Degree" map indicates higher percentages of block group populations with a post-high school degree in the north and northwestern half of the City of Danville. Alternatively, percentages are lower in the southern half of the city. Educational achievement impacts job choices and most likely income, both of which are factors in obtaining quality housing.

7. Hispanic Population

The 2000 Census reported that of Danville's 33,904 total population, 1,549, or 4.57% declared themselves as Hispanic in origin. Early Census 2010 results indicate that figure has grown to 2,154, an increase of 605 individuals, from 4.57% of the total population to 6.5%. For our purposes herein we will use the 2000 data which contains more details for analysis and comparisons.

An examination of other data in areas of income, household size, age and owner-occupation of housing reveals a combination of some striking similarities yet some strong contrasts to other groups within the City. The Census respondents identifying themselves as Hispanic or Latino split nearly straight down the middle in declaring their race, with half describing themselves as "white-one race" and the other half describing themselves as "other-one race." Only a very tiny number identified themselves in any other racial category. In an attempt to see a clearer picture of where Hispanics as an ethnic group stand in our City we have compiled some statistical comparisons to the two most predominant groups in Danville, those describing themselves as white, non-Hispanic and African-American non-Hispanic. For ease of text herein we shall refer to those three groups as "White", "African-American" and "Hispanic" from here forward.

Median Household Incomes	White	\$33,080
	African-American	\$19,013
	Hispanic	\$32,992

Clearly, from the figures above, and accounting that African-Americans make up 24% of the population, if it was available for us to see the median household income for all non-Hispanic households, that figure would be lower than that of Hispanic households.



City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics

Average household size marks a considerable contrast as illustrated below, Hispanic households are substantially larger than those of the two most prominent racial identities alone.

Average Household Size	White	2.23
	African-American	2.71
	Hispanic	3.67

Some understanding of this difference in household size can be seen in the table below, comparing the data on Whites and Hispanics down into age groups.

Age Groups	% of White Males	% of White Females	% of White Total	% of Hispanic Males	% of Hispanic Females	% of Hispanic Total
Under 18	22	20	21	25	48	37
18-35	23	19	21	46	31	38
35-59	34	32	33	23	19	21
60+	21	29	25	6	2	4

So we see that 37% of all Hispanics are under the age of 18, and fully 75% below the age of 35 years. Clearly this indicates more families with children and more young adults of parenting age than Whites overall where only 42% share those characteristics. Similarly, the sharp contrast in the percentage of persons over age 60, the age group which carries the least number of persons per households, further illustrates the reason Hispanic households have an average household size approximately 1.4 times the average size of the households of the other two groups listed. Taking this one step further in an attempt to understand the housing needs of Hispanics overall, we explored the event of large families amongst these three groups. Defining a large family as one of five or more persons we found the following:

LARGE FAMILIES

White only	930 out of 10,343	= 9%
African-American only	367 out of 2,527	= 14.5%
Hispanic	109 out of 357	= 30.5%

Now in this next table we will see the three groups in relation to their household income levels. We have used \$10,000 increments, applied to annual income to create a visual image that helps us understand, when analyzed along with these other household characteristics, what the housing challenges unique to Hispanic persons may be.



City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics

Income per year	White	African-American	Hispanic
<\$10,000	11.3%	28.8%	8.6%
\$10,000-20,000	16.9%	23.3%	15.2%
\$20,000-30,000	16.8%	19.2%	18.3%
\$30,000-40,000	15.3%	6.8%	22.7%
\$40,000-50,000	9.7%	7.2%	19%
>\$50,000	30%	16.4%	16.2%

What we see here is that 60% of all Hispanic households have incomes of between \$20,000 and \$50,000 per year, a substantially greater percentage than Whites, (41.8%) and African-Americans, (33.2%), yet when we examine the same three groups in relation to poverty we find that 30.75% of all Hispanics in Danville live in poverty, compared with 35.75% of African-Americans and only 12.6% of Whites. This is where the substantially larger family sizes take their statistical and economic toll. Mid-level incomes stretched across larger families equals more individuals battling poverty.

The rate of owner-occupation of housing is only slightly lower for Hispanics than for the City in general. City-wide the owner-occupation rate is 60%, while it is 55% for households with a Hispanic householder. While 45% of all households with a Hispanic householder are rental, those households contain 622 persons, or about 40% of the Hispanic population of the City. The median rent amount for households with a Hispanic householder is \$443 per month and the median market value of houses rented by Hispanic householders is \$34,100, the low end of the house value scale. For those who own, the average owner costs per month with a mortgage is \$507, and the average monthly costs without a mortgage is \$258. These are reasonable and manageable cost levels for the area.



D. Housing Characteristics

The opportunity for fair housing is affected by the age, condition, and price of available housing units. Data on the City of Danville’s housing stock provide information to identify impediments to fair housing. The total number of housing units in the City of Danville decreased between 1990 and 2000. This is similar to the decline in the number of households referenced above. More recent data between 2000 and 2009 show this downward trend continuing. Between 2000 and 2009 approximately 209 housing units were constructed, while 450 housing units were demolished.

1. Housing Occupancy

The Census Bureau provides helpful information on housing occupancy and vacancy. These data indicate that housing stock in the City of Danville held a vacancy rate of 10.47 percent in 2000. This is twice the state’s percentage of vacant housing units, which in 2000 came to 5 percent of the housing stock. Also note that vacancies are typically higher in the City of Danville among rental units than owner occupied units. For example, rental units had a vacancy rate of 11.8 percent in 2000, while owner occupied units had a 3.1 percent vacancy rate.

The percentage of occupied housing units in the City of Danville is inverse of the percentage of vacant housing at 89.53 percent. Of the occupied housing units, 62.53 percent are listed as owner occupied, with 37.47 percent renter occupied. These percentages are slightly different from the State of Illinois’ percentage of owner occupied units at 67 percent and percentage of renter occupied units at 33 percent. The map titled: “City of Danville: Housing Analysis: Percent of Housing Units” identifies locations by block group percentages of vacant, owner occupied, and renter occupied housing units.

Housing Unit Data

	Number	% of Housing Units
Housing units: Total	14,886	
Housing units: Occupied	13,327	89.53%
Housing units: Vacant	1,559	10.47%
Occupied housing units:		
Owner occupied	8,334	62.53%
Occupied housing units:		
Renter occupied	4,993	37.47%

Source: 2000 Census Summary File 1



City of Danville

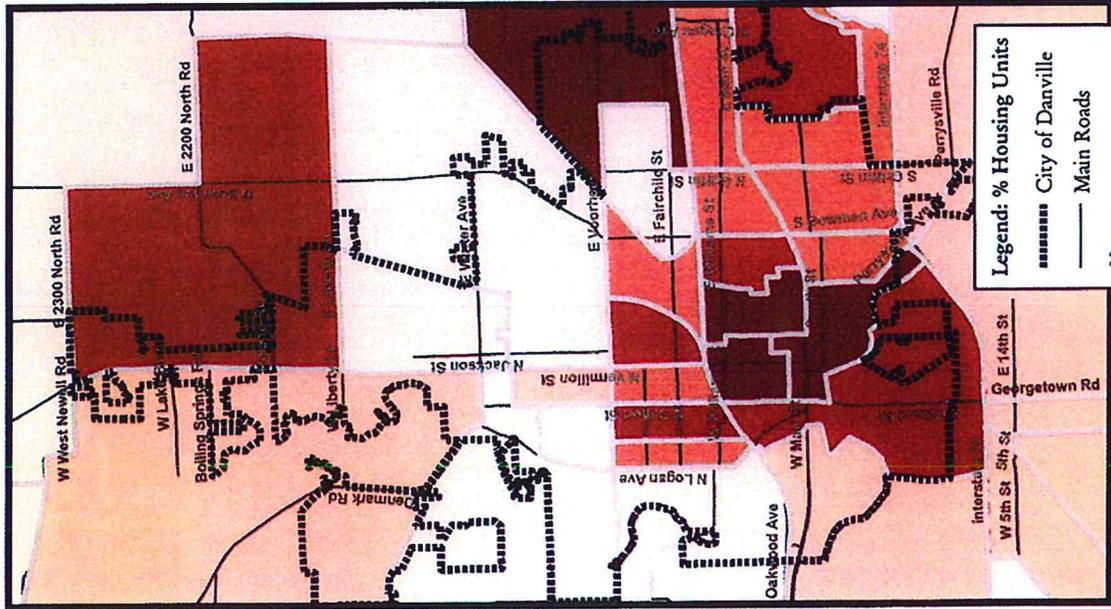
Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics



City of Danville: Housing Analysis: Percent of Housing Units

Data Source: Census 2000 (Data)
Date Created: August 1, 2010

Vacant



Legend: % Housing Units

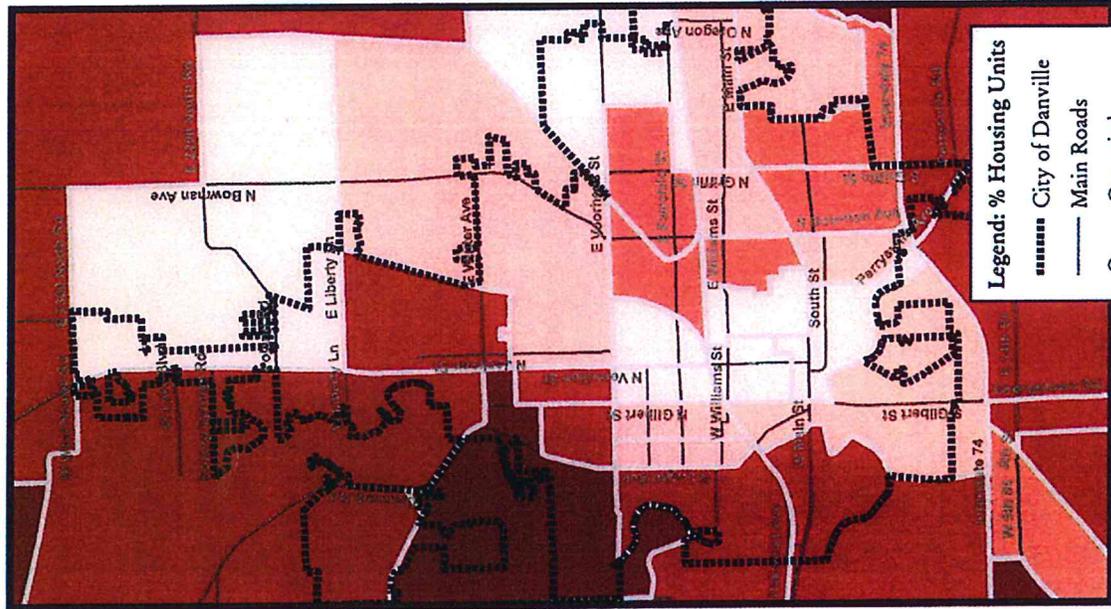
City of Danville

Main Roads

Vacant

- 2.6% - 5%
- 5.1% - 8%
- 8.1% - 11%
- 11.1% - 17%
- 17.1% - 26.8%

Owner Occupied



Legend: % Housing Units

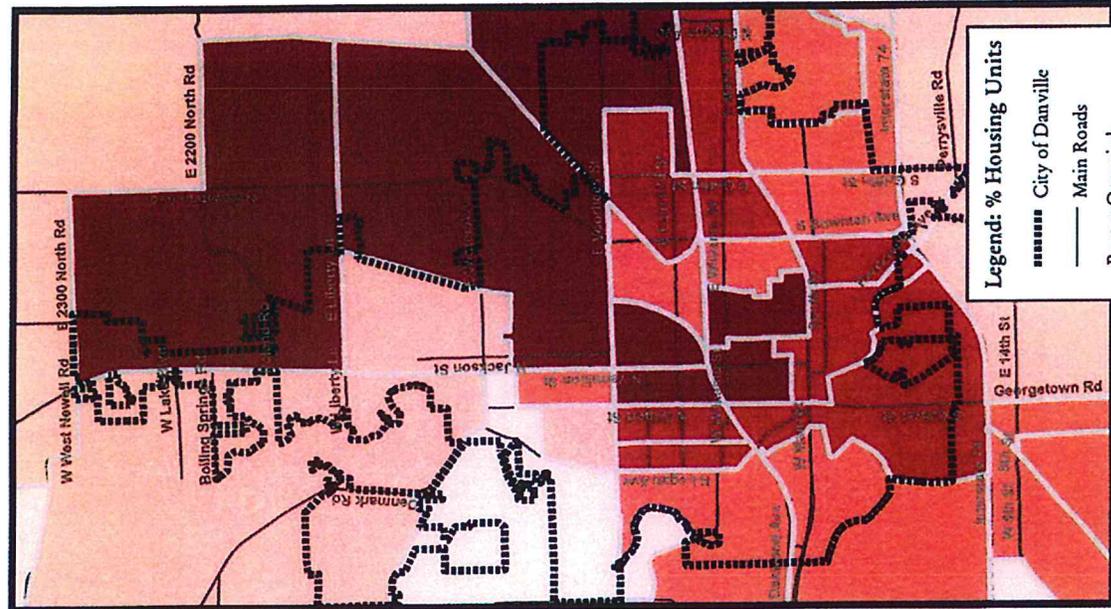
City of Danville

Main Roads

Owner Occupied

- 11.2% - 40%
- 40.1% - 60%
- 60.1% - 70%
- 70.1% - 80%
- 80.1% - 89.6%

Renter Occupied



Legend: % Housing Units

City of Danville

Main Roads

Renter Occupied

- 5.6% - 10%
- 10.1% - 20%
- 20.1% - 30%
- 30.1% - 40%
- 40.1% - 62%



City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics



2. Housing Type and Age

Housing type in the City of Danville is divided into single-family detached units, low to medium density units (2 to 9 units), high density units (10 or more), and mobile home units. The most prevalent housing type within the City of Danville is the single-family detached unit at 71.3 percent of the housing stock in 2000. This percentage is higher than the State of Illinois' number of 63 percent. Low to medium density units and high density units in the City comprised 15.3 percent and 9.6 percent, respectively. Mobile homes represent the remaining percentage of 2.2.

Older housing stock can pose significant problems such as energy inefficiency, mold, lack of accessible features for the disabled and elderly, and lead-based paint issues. The average age of the existing owner occupied housing stock as of 2009 is 55 years. Likewise, in 2000, nearly half of all housing units in Illinois had been built before 1960. The majority of the housing stock in Illinois was over 40 years old as of 2000. In the City of Danville, 90 percent of the entire housing stock was more than 30 years old as of 2009. Reference the table below for details on existing housing stock in the City of Danville.

Age of Existing Housing Stock

Date Built	Number	% of Total
2000 to 2009	209	1.6%
1990 to 1999	438	3.3%
1980 to 1989	674	5.1%
1970 to 1979	1,769	13.4%
1960 to 1969	1,926	14.6%
1950 to 1959	2,081	15.7%
1940 to 1949	1,911	14.4%
1939 or earlier	4,224	31.9%

Across the State of Illinois at-large the median age of housing units is forty years. In the City of Danville the median age is 59 years, meaning that fully 47% of all the homes in the City were built before 1947. Statewide 25% of all homes are less than twenty years old, where the portion less than twenty years old in Danville is only 4.9%.

3. Housing Condition

We have a city-wide Structural Conditions Survey wherein only the structures rated “good” represent structures of standard condition with no visible housing code violations or substantial maintenance needs. Those structures rated as “Fair” and “Poor” represent housing that is substandard but suitable for rehabilitation. Conditions visible on these homes ranged to and included some housing code violations, while not presenting an overall decline that appeared to be a direct threat to health and safety. The fourth classification, for those structures totaling the highest points, was termed “dilapidated”. We consider these structures both unfit and not economically feasible candidates for future rehabilitation. To make the survey data applicable to this plan, only data from structures verified as residential was used in the following analysis.



City of Danville

Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics

For the entire city as a whole there ended up being 6,825 residential structures (65.1%) that were rated as “good” in 2000. In addition, there were 2,797 (26.7%) that were rated as “fair”. Just over 8% were rated as either “poor” or “dilapidated”. As a whole, the structural conditions of residences in Danville aren’t all that bad. However, a mapping of the structural conditions shows that conditions aren’t uniform across the city. In fact, there are some neighborhoods that have much poorer conditions and many more “poor” and “dilapidated” rated structures than others. For further analysis the city was subdivided into two halves along Voorhees Street, which is one of the major east/west roads in the community and also is the separation line between two townships. Most of the new residential development in Danville in recent decades has occurred North of Voorhees St. The downtown area and most of the community’s older neighborhoods are located south of Voorhees St. There were a total of 3,934 residential structures surveyed that are located north of Voorhees St. and a total of 6,551 residential structures surveyed that are located to the South of Voorhees St. The table below shows the disparity in structural conditions between the area North of Voorhees St. and the area South of Voorhees St. The Department of Public Development plans to re-conduct this survey city-wide during 2010.

Residential Structural Conditions – 2000		
Rating	North of Voorhees St.	South of Voorhees St.
Good	3468	3357
Fair	453	2344
Poor	13	776
Dilapidated	0	61

The number of structures North of Voorhees that were rated as “good” represent 88.2% of the total structures to the North of Voorhees. In contrast, the number of structures rated as “good” to the South of Voorhees represents only 51.2% of the total number of structures South of Voorhees Street. Of the residential structures rated as either “fair”, “poor” or “dilapidated”, over 87% are located South of Voorhees Street. This data shows that the overall conditions of housing North of Voorhees Street is clearly better than the conditions South of Voorhees Street and that there is a definite need for improvement in the housing conditions to the South of Voorhees Street.

4. Size of Housing Units

Data from the 2000 census indicates that at that time Danville had 14,868 housing units. We estimate that the figure today is closer to 14,400, quite a few having been lost to demolition and fires during the decade. Of those 13,000, or 88% are three-bedroom or less in design, leaving only 12% or about 1800 units in which there are four or more bedrooms. We studied the September 2010 real estate listings as published for Danville and the surrounding area by Young’s Publishing, Inc. of Dayton Ohio. The source materials for that publication are provided by the Danville area Board of Realtors. It revealed that there were nineteen two-bedroom houses for sale, twenty-three three-



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bedroom houses, seven four-bedroom, five five-bedroom and one six-bedroom house. The median asking price for a two-bedroom was \$37,900, three-bedroom \$45,000, four-bedroom \$79,000 and five-bedroom \$80,000. Clearly, the cost of homes with four or more bedrooms being twice that of units with two bedrooms presents a cost burden for many larger families.

5. Housing Value and Rental Costs

Cost is a central issue to housing availability and affordability. The median sale price for owner occupied housing units in the City of Danville was \$52,500 in 2000. Five years later in 2005, a report by the National Association of Realtors listed the median sale value for a single family home in the City of Danville as \$67,700. The National Association of Realtors indicated an average sale price of \$62,478 in 2008 and \$59,609 in 2009. In contrast, recent data from the Illinois Association of Realtors report a median sale price in 2009 of \$48,750. Our own study of the September 2010 Danville Area Board of Realtors data on houses offered for sale indicated the Illinois Association of Realtors 2009 report was likely accurate and mostly unchanged one year later. Out of fifty-five Danville houses listed for sale during September 2010, twenty-three (42%) were offered at an asking price at or below \$40,000 and thirty-one of the fifty-five (56%) at or below \$50,000.

Census data provide a broader view of housing prices. The 2000 Census identified 2,725 housing units of the 8,334 owner occupied units in the \$50,000 to \$99,000 range. In addition, within the City of Danville, 3,614, or 43.4 percent, were valued at less than \$50,000. The number of housing units in the low and intermediate ranges of value indicates a sizeable amount of available affordable housing. Reference the map labeled: "Median Housing Price Asked" for location concentrations by block group pertaining to housing price.

The 2000 Census indicated that of the 8,334 owner occupied units in Danville, 3,614 of these units are valued at less than \$50,000. These 3,614 units represent 43.4% of the available housing stock. At the top of the decade that meant that 43% of our housing at the time could be financed with a monthly principle and interest payment amount of \$295.00. With the addition of taxes and insurance a house payment below \$400.00 per month was still possible. These depressed values do however carry with them a potential obstacle to their continued fitness. The ability to utilize accumulated equity to finance repairs, maintenance and improvements is severely limited. The cost of a new roof, furnace, energy-efficiency upgrades and other anticipatable upkeep activities is roughly equal in Danville as these other nearby communities, yet often owners of our lower-valued structures are unable to finance this maintenance work.

Rental cost is a key component to available housing. An estimated 39 percent of the housing stock in the City of Danville was renter occupied as of 2006. The 2000 Census listed the median rent as \$317, with the majority of rentals falling between \$250 and \$450. During the ten years between 2000 and the present we estimate rents have risen approximately \$50 per month, meaning the median may now be at \$365-370 per month. We arrived at this estimate through reviews of advertised rentals and through consultation with the Danville Area Landlords Association. It is important to note that the typical renter in the Danville Metropolitan Area earns \$9.13 per hour,

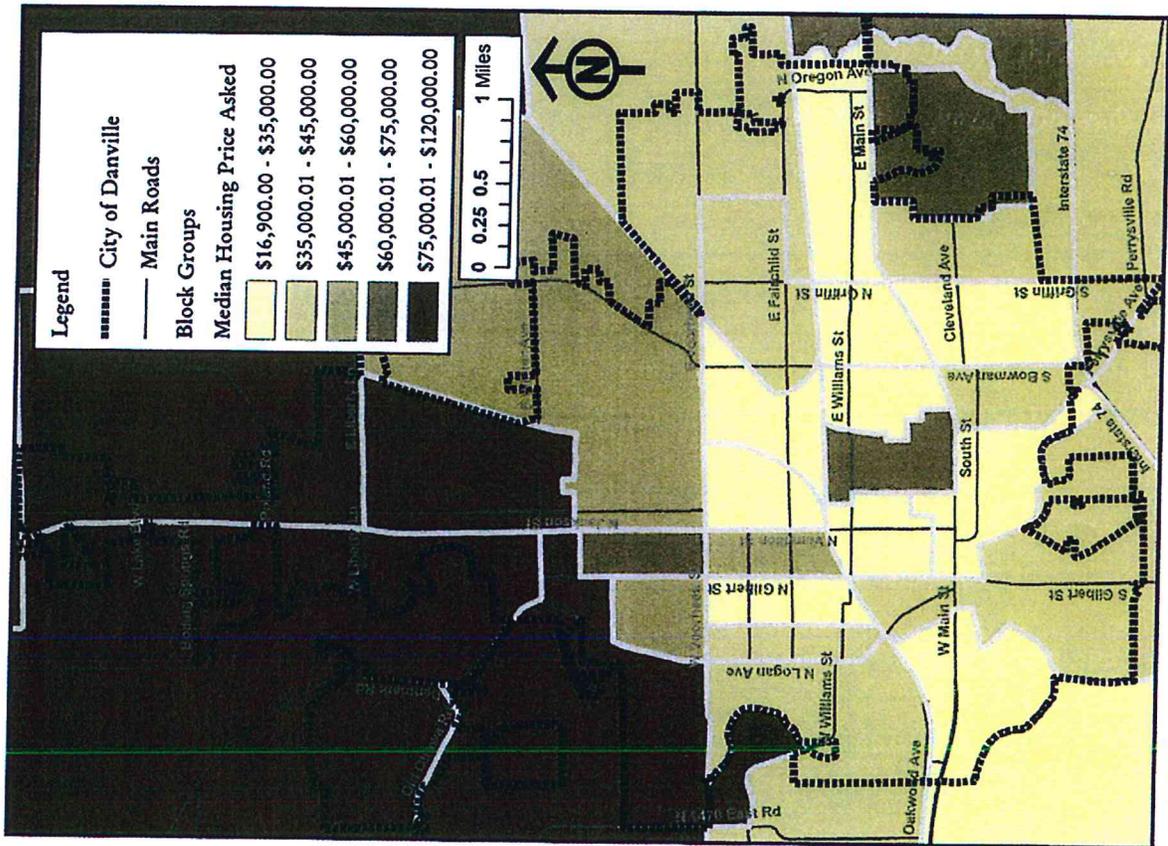


City of Danville

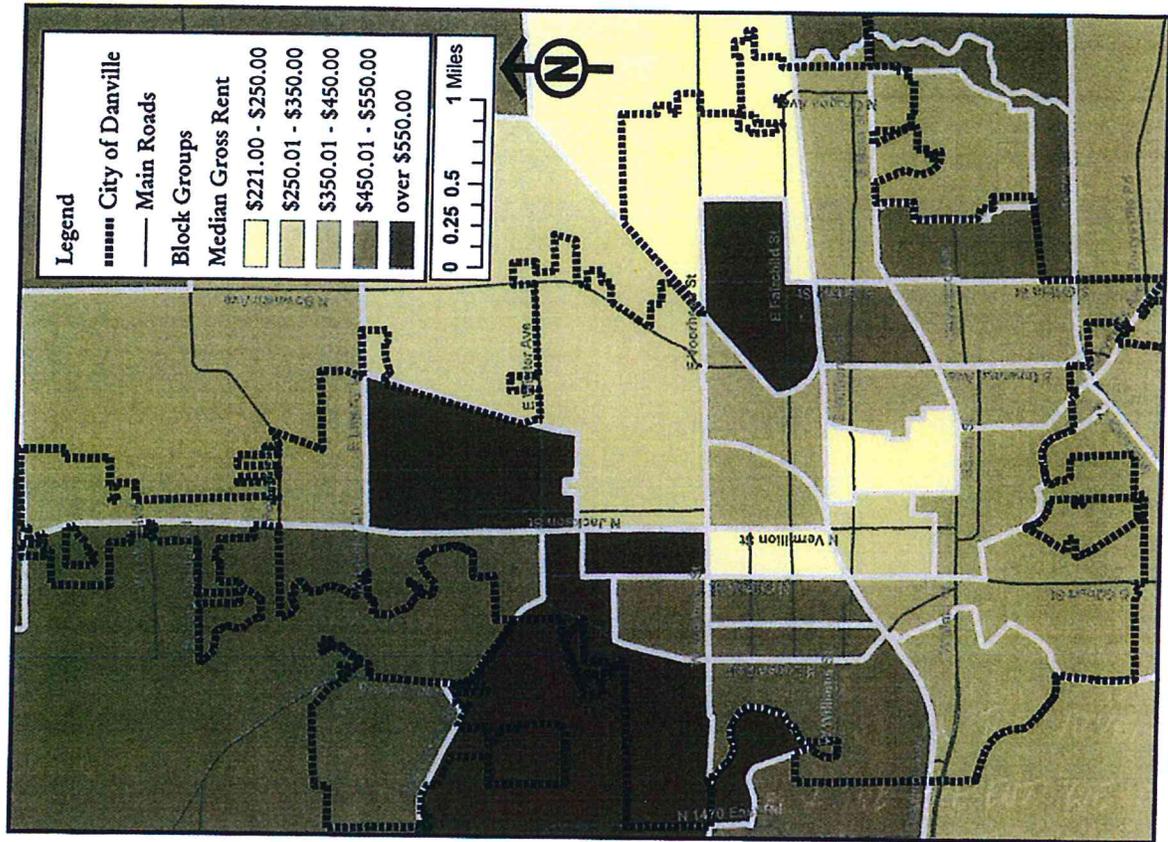
Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics

which is \$1.24 per hour less than the minimum necessary to afford a modest housing unit without paying more than 30 percent of his or her income for housing expenses. An estimated 42 percent of City of Danville renters do not earn enough income to satisfy this formula. Reference the map titled: "Median Gross Rent" for median gross rent per block group from the 2000 Census.

**City of Danville:
Median Housing Price Asked**



**City of Danville:
Median Gross Rent**



Data Source: Census 2000 Data
Date Created: August 1, 2010



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6. Live-Near-Work Issues

Examining place of residence and place of work data indicate population densities for where people live and work. The maps labeled: “Place of Residence with Major Employer Locations” and “Place of Work with Major Employer Locations” illustrate population densities for workers and jobs. The “Place of Residence” map shows a concentration of workers in central and east central Danville. The “Place of Work” map indicates a concentration of jobs in central and downtown Danville and east Danville. Comparison between the spatial representations in the two maps indicates the need for workers to travel to the central and eastern portion of Danville for work.

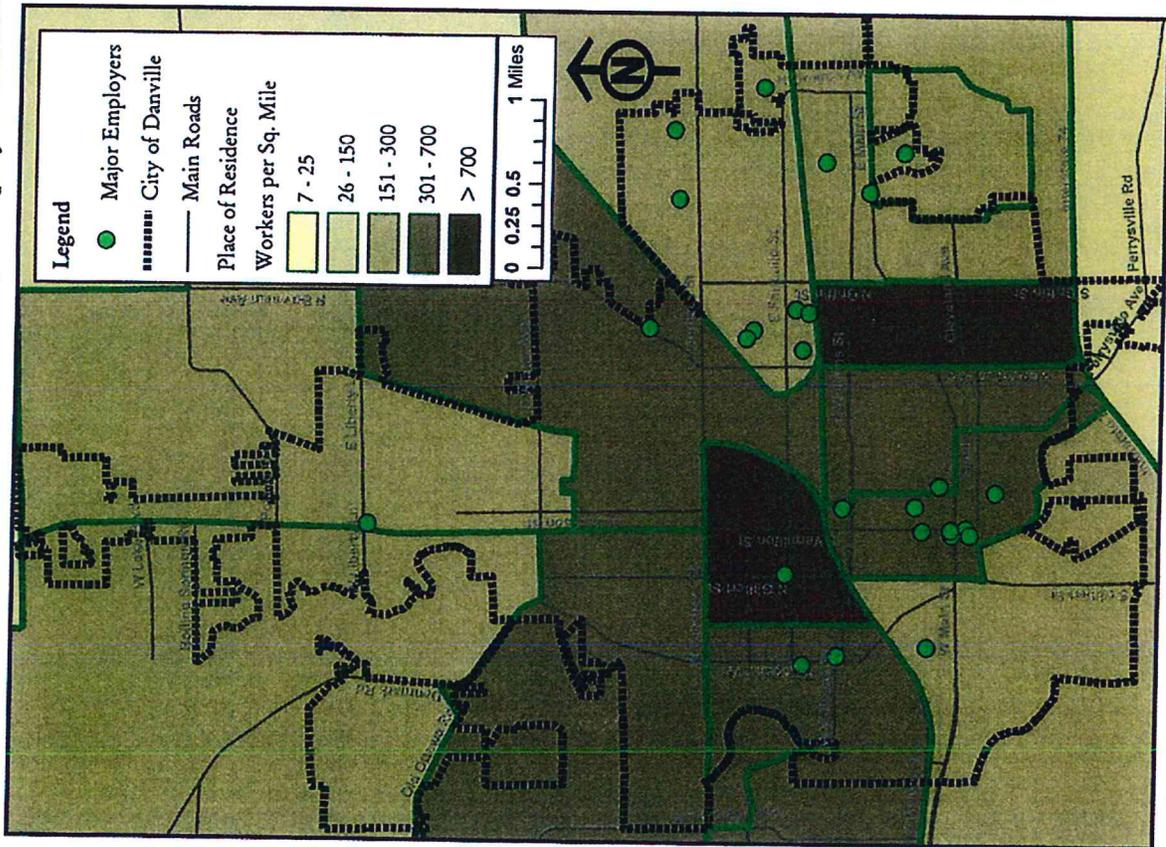
Transportation is another analysis component for understanding living costs. The map labeled: “Percentage Vehicle Occupancy of Total Workers Over 16 by Means to Work” illustrates areas of the City of Danville with higher percentages of vehicle occupancy for workers. The map also shows the percentage of how workers traveled to work: drove alone, carpooled, or non-vehicle/other. This map shows that the block groups in the south and south central of the City of Danville have a lower percentage of workers with vehicle occupancy. Those same block groups also have a higher share of workers who did not drive alone to work. These data indicate transportation behaviors by location, which effect living expenses.



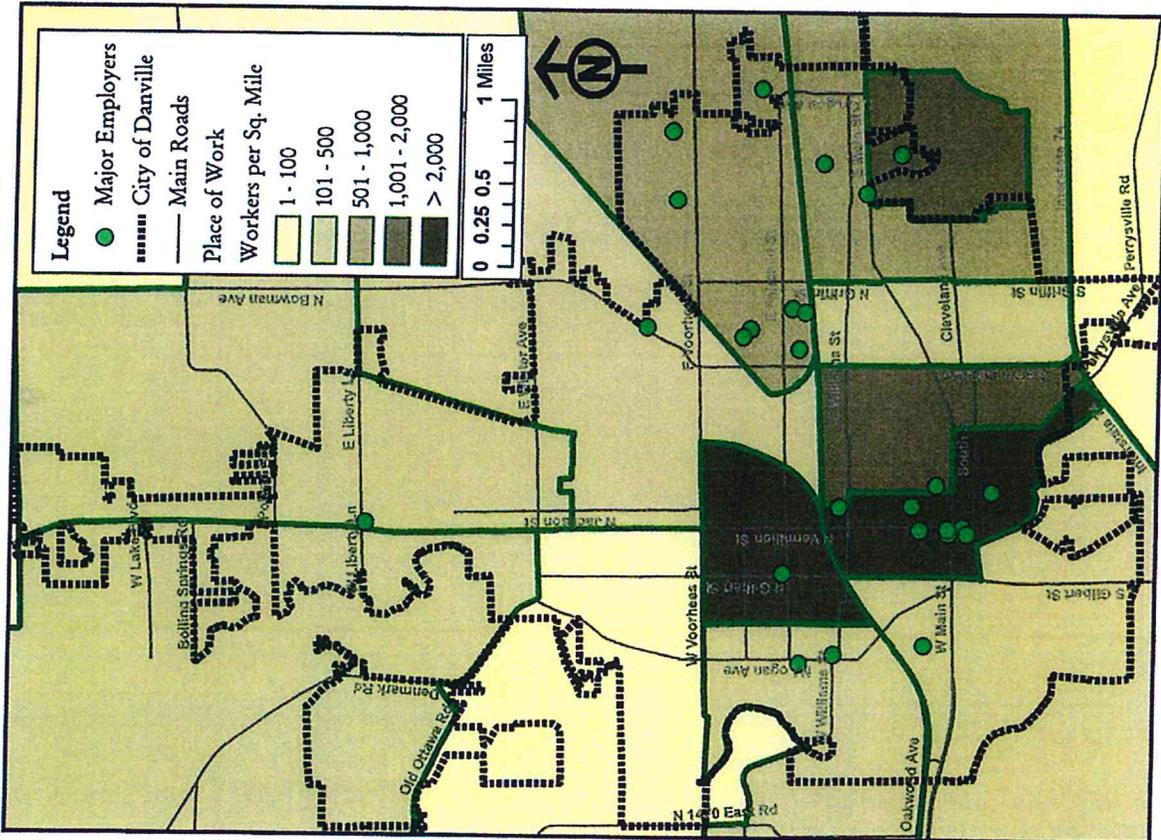
City of Danville

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City of Danville: Place of Residence with Major Employer Locations



City of Danville: Place of Work with Major Employer Locations



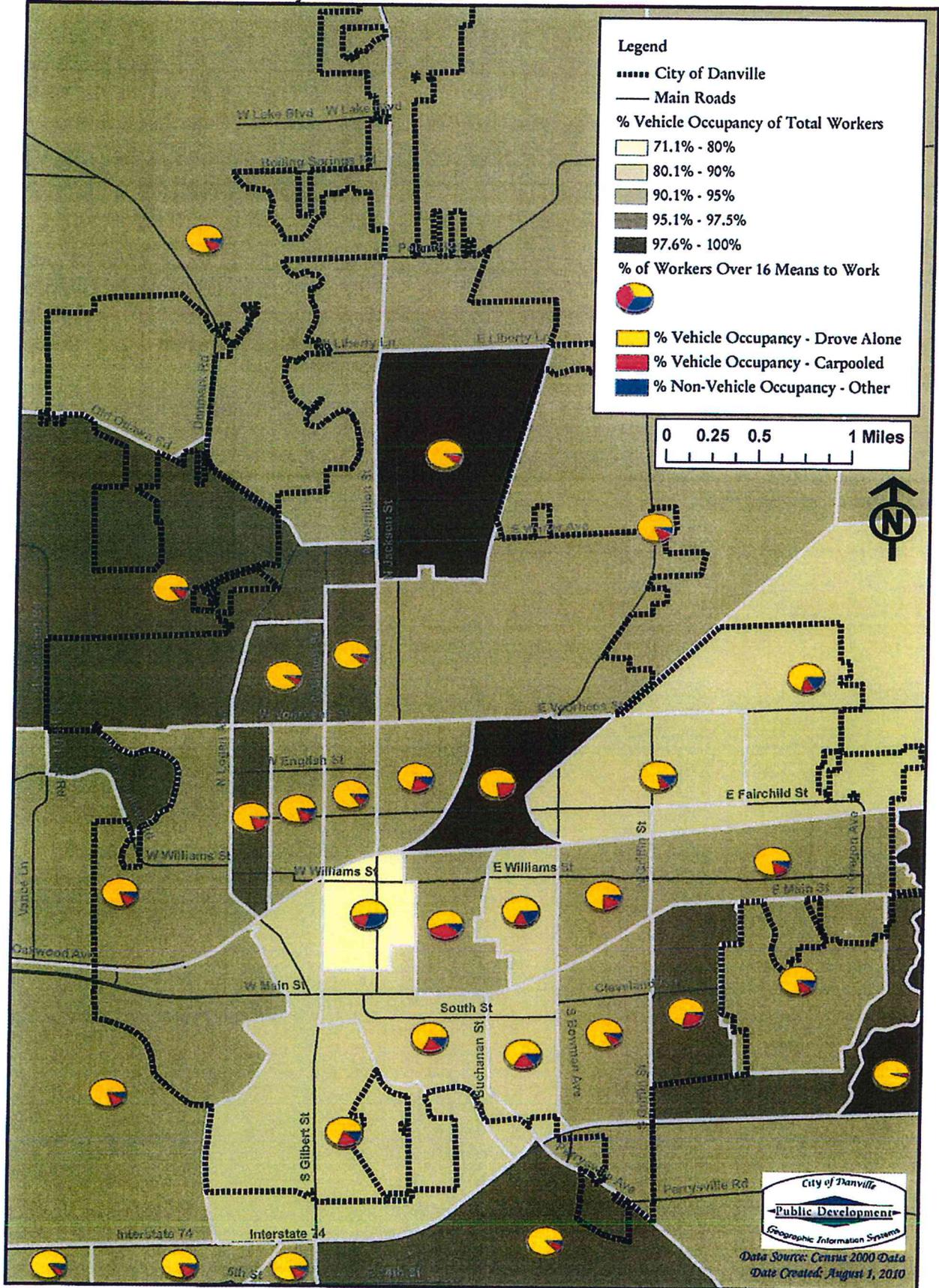
Data Source: Census 2000 Data
Date Created: August 1, 2010



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Analysis of Impediments to Fair Housing Chapter 4: Local Housing Market & Demographics

City of Danville: Percentage Vehicle Occupancy of Total Workers Over 16 by Means to Work





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7. Accessibility

The 2000 Census estimated that 1,888 individuals under 65 suffer from physical disabilities in Danville. An additional 1,645 age 65 and above have physical disabilities. Physical disabilities can act as a barrier to housing, employment, and even mobility. Fortunately most of these physically disabled residents do not require supportive services. Many are economically unable to remove architectural barriers in their housing which negatively impact their ability to fully and safely utilize their living quarters.

The City of Danville has utilized state and federal funds to modify houses and apartments to enhance accessibility to those with disabilities since 1997. The City maintains a grant program specifically designed to provide home accessibility modifications to low and moderate income individuals and families. Up until 2003 this program was referred to as the Mobility and Accessibility Rehabilitation Supplement (MARS) Assistance Program. It was funded using state-dispensed CDBG funds. Since our transition into direct entitlement in 2004, an average of \$100,000 per year has been used for these projects, now termed the Accessibility Modifications Program. Since 2004 thirty-two housing units have been made accessible through this Program, and a total of fifty-one overall since 1997. Demand for these modifications continues to run high, and without any reliable data pertaining to the number of accessible units available we can only rely upon what we do know. We know that our housing stock is old, mostly more than fifty years of age. We know that much of our housing is low market value, and as such is difficult to finance and difficult to maintain. We know that every year income-qualified applicants in need of accessible housing seek our programmatic assistance. From these we assume that accessibility modifications are taking place at less than the current level of need for accessible housing.

8. Fair Housing Complaints

In an effort to guarantee that Fair Housing laws are observed, the City of Danville continues to operate a Human Relations Office. Guided in policy by an appointed citizen commission, the office is operated by a full-time Director with many years experience in her field.

The Office received and processed housing related citizen complaints during the last five years as follows:

Year	Number of Complaints	Those with no apparent pattern of actionable violation	Those resolved through mediation
2005	7	7	0
2006	5	5	0
2007	5	5	0
2008	15	13	2
2009	8	7	1



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Total	40	37	3
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Investigation by the Human Relations Director resulted in a determination that no pattern of actionable violation was indicated in thirty-seven of the forty complaints. The remaining three complaints were determined to be substantive, and mutually acceptable non-economic resolutions through mediation followed.

All complainants were advised of other available options for pursuit of their claims.



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Analysis of Impediments to Fair Housing Chapter 5: Impediments to Fair Housing Choice

In this chapter we present the specific areas studied as part of the Analysis, impediments to fair housing choice identified by the Analysis, (described in brief as “Conclusions”) and recommendations for their reduction/elimination.

A. Public Policies

1. Rental and Vacant Building Registrations - In 2007 the City implemented an annual rental registration program which requires rental property owners to register the properties they have available for rent. This program was put in place to allow for the inspection of rental housing and to ensure compliance with the minimum level of housing standards contained in the City’s Property Maintenance Code. We believe this program has and will continue to contribute to improved health, safety and overall livability and help reduce housing deterioration within the city's neighborhoods while promoting further revitalization. Additionally, in 2008 the City Council authorized the creation of a vacant building registration program. Buildings which remain vacant for extended periods of time tend to become unsightly and create a safety hazard for the surrounding neighborhood. This program was initiated to protect the public health, safety, and welfare and to speed the rehabilitation and reoccupation of vacant structures.

Both of these programs are relatively new, but to this point the City has seen positive results and as time passes these programs should become more effective in revitalizing the City’s neighborhoods and ensuring decent affordable housing is available to all who need it.

Conclusion – Item A 1 - We see nothing in either of these policies that present impediments to fair housing choice.

2. Zoning and Land Use Planning - Over the last few years the City of Danville has made significant revisions to both the zoning ordinance as well as the Comprehensive Plan. In the course of these revisions, the City made an effort to reduce the barriers to the construction of both affordable housing and the creation of mixed income, mixed housing type neighborhoods. The City has also made it more feasible to invest in established neighborhoods by providing additional incentives to construct infill housing in these existing neighborhoods.

The zoning ordinance now has more provisions for the creation of mixed housing types including the modification of one zoning district specifically designing it to encourage a mixture of housing types likely to be occupied by families across varying income levels. This is in an existing neighborhood near the downtown. The new provision opens up greater flexibility in housing design that can accommodate wider income diversity within the neighborhood.

Although new housing construction has been slow in Danville for many years, this change has



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already resulted in some single-family residential construction designed for a broader economic diversity than the older model zoning.

Another change made to the zoning ordinance was the reduction in size of required side yard setbacks in some zoning districts in order to make infill housing on existing lots within older established neighborhoods feasible. Most of these older established neighborhoods had been platted and developed in a manner that differs greatly from more recent housing subdivisions. This change will ensure that when vacant lots become available in these older neighborhoods, the zoning of the property will not be an impediment to the redevelopment of those lots.

In recent revisions to the City's Comprehensive Plan two major themes took precedence, revitalization of existing residential neighborhoods and the redirecting of new residential construction back to the inner City. For the first time in history we are now making a concerted effort to direct the majority of new development to areas already inside city limits and already structured to support residential development. Along with that, the revitalization of existing residential neighborhoods is viewed as vital to the economic health and quality of life of current and future residents. Both of these overarching goals will serve to improve the available housing stock and ensure that an adequate amount of affordable housing remains available within the community.

The City makes available financial and payment-in-kind assistance on a one-by-one negotiable basis to any housing developers willing to consider redevelopment in the form of infill construction in these traditional neighborhoods. These older neighborhoods, unlike their more recent cousins, do not carry covenants or property restrictions that can inflate costs and possibly even become the very impediments we intend to reduce.

Conclusion A 2 – Older zoning and land use policies and covenants still in effect in neighborhoods not revised in recent years may be construed to be impediments.

Recommendations:

Continue to pursue progressive redevelopment planning and flexible zoning and land use policies aimed at helping all neighborhoods be as economically and culturally diverse as possible. Encourage and support the creation of new housing opportunities in a broad variety of existing neighborhoods and discourage the establishment of restrictive covenants and land use restrictions that may be impediments to fair housing. To accomplish this:

1. The Community Development Division will consult with the Planning & Zoning Manager to develop an education program for members of the Planning & Zoning



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Commission on fair housing issues and the advantages of implementing more progressive policies citywide.

2. The Division will further recommend through the Planning & Zoning Commission to the City Council for establishment of a policy that fair housing considerations be reviewed on all new subdivision plats within the City wherein restrictive covenants are to be utilized.

B. Fair Housing Advocacy/Legal Assistance

The City of Danville and Vermilion County do not have a tenant's union or other similar entity devoted to housing counseling, education or advocacy on behalf of low-income persons. The Land of Lincoln Legal Assistance Foundation serves clients up to 125% of the federal poverty threshold, but their offices are located in Champaign, Illinois, some thirty miles away. For many of the persons who income qualify for their services, that thirty miles might as well be three hundred miles, as many of them lack the transportation, and sometimes even the communication capability to avail themselves of the assistance. The City does maintain a Human Relations Commission and a full-time Human Relations Manager who receives and reviews fair housing complaints among all other forms of human relations issues. This one person, working alone across such a broad field of issues cannot carry out the type of housing education and advocacy needed by a population the size of ours.

Conclusion B – Danville lacks a tenants' union, and lacks locally-based legal assistance for low income persons. Each condition can constitute an impediment.

Recommendations:

Seek resources to establish a local tenant's union and for the expansion of legal assistance services to low income persons. To accomplish this:

1. The Community Development Division will contact the Land of Lincoln Legal Assistance Foundation, (the organization that currently provides legal assistance services to low income Danville residents but is located in Champaign, Illinois), to discuss what it may take to make their service available in Danville on at least a part-time basis. This can be accomplished within what remains of 2011, with the actual establishment of local service subject to the results of that inquiry and resources necessary.
2. Danville Area Mass Transit should maintain its bus service between Danville and Champaign-Urbana to provide affordable transportation access to legal assistance services for Danville residents.

C. Landlord/Tenant Guidance



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The City of Danville's Police Division of the Department of Public Safety in conjunction with the Department of Public Development dispenses a guidebook on landlord/tenant relations. With seventy-one pages of text and twenty pages of forms, this book is aimed at aiding the owner of investment property in the defense of his/her property. It contains approximately three pages on fair housing and tenants rights, which appear to be accurate. The only statutory or regulatory reference used in the work is The Illinois Human Rights Act, 775ILCS 5/. Federal law is not discussed at all.

Conclusion C – The City's informational guidebook lacks thorough information on fair housing for the buyer/lessee participants in housing transactions.

Recommendations:

Expand the portion of the booklet "A Guide to Landlord/Tenant Relations" to include a more comprehensive chapter on fair housing and civil rights. The Community Development Division will study tenants' rights publications offered by other communities and develop the additional chapter within twelve months.

D. Lack of Affordable and Suitable Housing

In 2007 participants and professionals engaged in housing issues from across the State of Illinois conducted a Fair Housing Survey. A lack of "affordable and suitable" housing was identified by that survey as the most prevalent of all the identified housing impediments. Affordability and suitability are two admirable goals for which any community's housing market should strive, yet are so often at cross-purpose by their very nature. As has been discussed throughout this document, the City of Danville's housing market has a unique tilt on these two conjoined obstacles in that housing here is very low-priced, yet much is in substandard condition. We have examined the issue of suitability from four specific perspectives; age, condition, size and accessibility.

1. Age of the Housing Stock – Across the State of Illinois at-large the median age of housing units is forty years. In the City of Danville the median age is 59 years, meaning that fully 47% of all the homes in the City were built before 1947. Statewide 25% of all homes are less than twenty years old, where the portion less than twenty years old in Danville is only 4.9%. The age of a housing unit can potentially impact housing choices and affordability in a number of ways. Older units are by design less likely to be suitable for residents with mobility impairments, and more difficult and expensive to modify to make them accessible. More details on that further along under number four, "accessibility".



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This also means that one half of all the housing units in Danville are quite likely to contain lead-based paint. The early 1950s ushered in the era of water-based as opposed to oil-based paints. Since lead was only used as an ingredient in oil-based paint formulas, the advent of water-based paint did more to reduce the application of lead than any other factor of that era.

It is also true that it was only after World War II that the housing construction industry began utilizing insulation, air infiltration reduction measures and other energy conservation materials and techniques in homes to any appreciable degree. In Danville these products only begin to appear as original installations in moderately priced housing built after approximately 1955, meaning that closer to 60% of all our existing housing units were built without energy efficiency systems and measures. While many have been retrofitted over the years the community development and construction codes staff still find many homes without substantial insulation or air infiltration devices. As can be expected, these appear more often in the neighborhoods with the lowest housing values, another illustration of how the relationship between “affordable” and “suitable” can be so volatile, and the status of each can be difficult to objectively evaluate. In chapter four of this Analysis we presented the frustration of how low housing value undermines the capacity to maintain and update that housing in an environment where appreciating value of housing determines the level of reinvestment that can be financed.

Conclusion D 1 – Old housing stock is in some cases an impediment where city-wide depressed housing values limit reinvestment, maintenance and modernization, and make new construction economically impractical.

Recommendations: In recognition of this impediment Danville has invested every year for decades in housing rehabilitation, interest-free home repair loans to low-income homeowners, Emergency Home Repair grants and financial assistance to builders of new housing for low-income persons. We propose to continue to accommodate and encourage the replacement of housing stock that has been lost to demolition due to irreversible decay. Continue to conduct rehabilitation grants and loans in low-moderate income neighborhoods. To accomplish this;

- a. Continue to offer financial and in-kind benefits as described in the City’s “New Day Initiative” for builders of replacement housing units.
- b. Continue to acquire, clear, and provide redevelopment ready lots to the local chapter of Habitat for Humanity as we have for many years.



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2. Condition of the Housing Stock – As a result of a variety of conditions discussed in this Analysis, the physical condition of the housing units in Danville constitutes an impediment. We maintain that Fair Housing needs to also be clean, safe, decent and affordable. We believe that we have enough housing, it is fundamentally affordable housing, but too much of it fails the clean, safe, decent test. Using our city-wide Structural Conditions Survey wherein only the structures rated “good” represent structures of standard condition with no visible housing code violations or substantial maintenance needs. Those structures rated as “Fair” and “Poor” represent housing that is substandard but suitable for rehabilitation. Conditions visible on these homes ranged to and included some housing code violations, while not presenting an overall decline that appeared to be a direct threat to health and safety. The fourth classification, for those structures totaling the highest points, was termed “dilapidated”. We consider these structures both unfit and not economically feasible candidates for future rehabilitation. To make the survey data applicable to this plan, only data from structures verified as residential was used in the following analysis.

For the entire city as a whole there ended up being 6,825 residential structures (65.1%) that were rated as “good” in 2000. In addition, there were 2,797 (26.7%) that were rated as “fair”. Just over 8% were rated as either “poor” or “dilapidated”. As a whole, the structural conditions of residences in Danville aren’t all that bad. However, a mapping of the structural conditions shows that conditions aren’t uniform across the city. In fact, there are some neighborhoods that have much poorer conditions and many more “poor” and “dilapidated” rated structures than others. For further analysis the city was subdivided into two halves along Voorhees Street, which is one of the major east/west roads in the community and also is the separation line between two townships. Most of the new residential development in Danville in recent decades has occurred North of Voorhees St. The downtown area and most of the community’s older neighborhoods are located south of Voorhees St. A detailed description and table illustrating this can be found in Chapter 4 of this Analysis under “Housing Condition”. A map of the City illustrating this structural conditions survey is on the following page and the broad patterns can be clearly observed.

City of Danville 2000 Structural Conditions

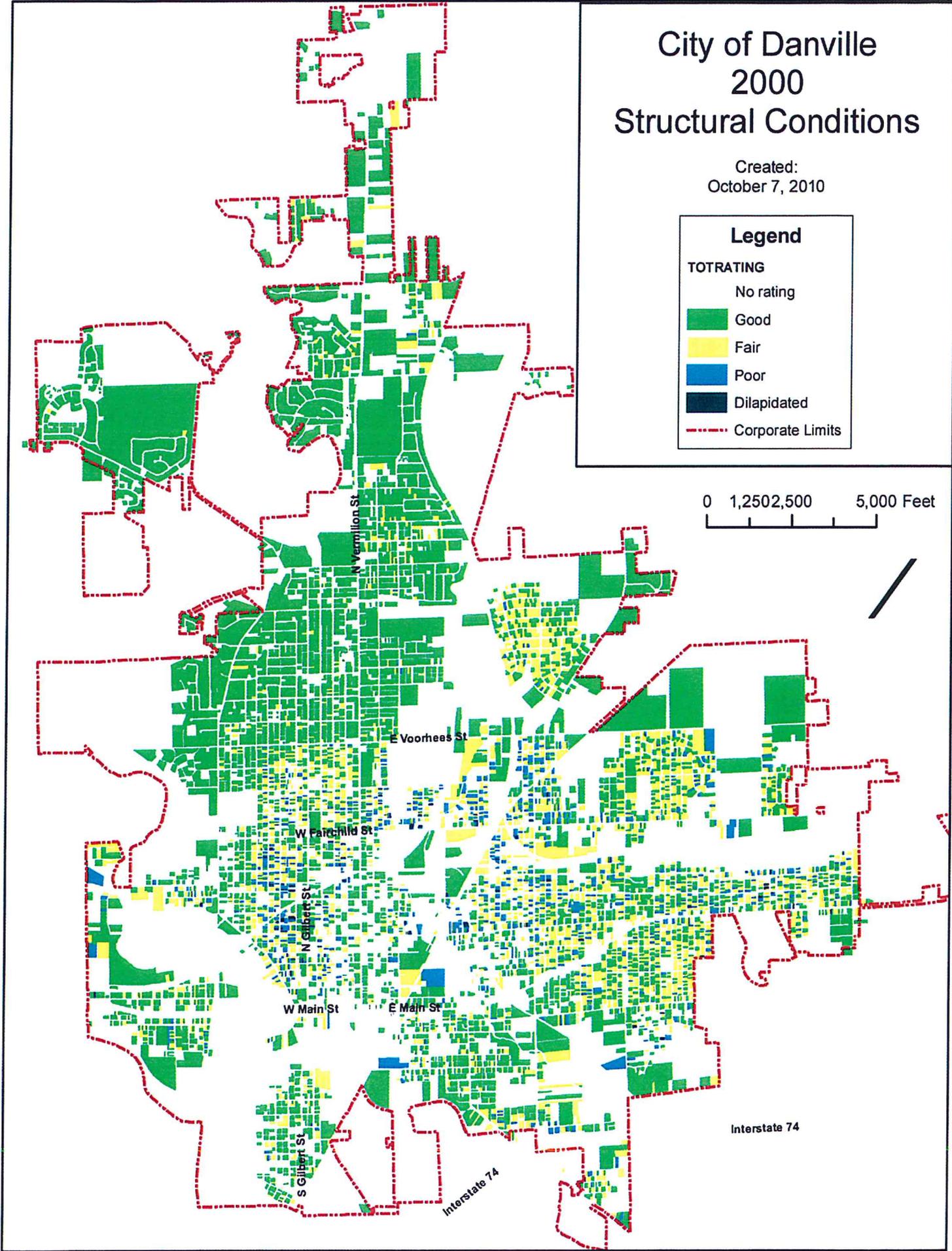
Created:
October 7, 2010

Legend

TOTRATING

- No rating
- Good
- Fair
- Poor
- Dilapidated
- Corporate Limits

0 1,250 2,500 5,000 Feet





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Conclusion D 2 – Too much of the affordable housing is in a substandard condition

Recommendation: Continue to use code enforcement and housing rehabilitation grants and loans to elevate the quality level of the housing stock in place.

Specifically, team with at least one low-moderate income neighborhood per year and conduct housing rehabilitation in those neighborhoods for qualified households as we have for decades.

3. Size of Housing Units/Large Families – Data from the 2000 Census indicates that at that time Danville had 14,868 housing units. We estimate that the figure today is closer to 14,400, quite a few having been lost to demolition and fires during the decade. Of those 13,000, or 88% are three-bedroom or less in design, leaving only 12% or about 1,800 units in which there are four or more bedrooms. It is difficult to know how many of these are at the upper end of the housing market, but construction permit experience tells us many are not within reach of moderate income households. Large families and households with more than three children have very few suitable housing units from which to choose in this regard. In the development of this Analysis every service agency with whom we consulted who interacts with families reported that large families routinely report difficulty in finding housing with more than three bedrooms. In interviews with investor-owners of rental housing, we found none who expressed any interest in offering units with four or more bedrooms or expanding their stock to have the same. In our section on rental housing, more appears concerning the negative perception of large families and households with more than three children. In brief, it is perceived that larger families place more burden on the unit's systems, more wear-and-tear, without additional monetary consideration.

When we examine the Census data to attempt to identify where the size of housing units may be impacting a particular population, the racial ethnic bias becomes quite vivid. Amongst 10,343 white alone households only 177 or 1.7% have more than one occupant per room in the unit. Amongst African American alone households 150 out of 2,489 or 6% contain more than one person per room in the unit. When we then go to Hispanic/Latino alone households the numbers leap again, to 66 out of 361 or 18.3%.



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In the previous Chapter 4 we presented evidence that housing offering more than three bedrooms was low in availability and substantially higher in price than those with three or less bedrooms, in fact nearly double. This places larger families substantially more likely to be housing-cost burdened than small families. We accept that these figures only address single-race, single-ethnicity declaring households, and as such paint only part of the picture, yet the contrasts are so stark it is reasonable to assume that size of housing units is an impediment which challenges minority households more than white households.

Conclusion D 3 – The lack of housing units that can accommodate households of more than 3-4 persons and the corresponding price of those units are both impediments to those households.

Recommendation: 1. Continue and strive to expand the current “Purchase, Rehabilitate and Resale” program in Community Development focusing on houses for large families.

2. Team with the established neighborhood associations and the local news media to dissolve the public perception of large families as undesirable neighbors, buyers and renters by showcasing large families who are assets to their neighborhoods and their City, and watch vigilantly for violations of fair housing laws in this regard.

3. Encourage and assist developers of multi-family housing to design for no less than 10% of the total units as four bedroom units.

4. Accessibility - In Chapter 4, Section D, item #7 we presented the state of housing and persons with disabilities in the community, and the recent efforts to address this need through grant funded modification assistance. The City of Danville has recognized this need for many years and was one of the first cities of our size to institute a consistent and perennial grant program for accessibility modifications for the homes and workplaces of persons with disabilities. This assistance has continued seamlessly for now thirteen years.

Beyond that, efforts are needed to encourage at least a standard of “visitability” in all new construction and a higher consciousness on the need for accessibility in existing housing units. **This is not intended to replace or circumvent the higher standards incumbent on some housing development and rehabilitation, nor to in any way escape requirements for accessibility found in the Fair Housing Act or Section 504 of the Rehabilitation Act.** Accessibility standards are being promoted by the Community Development Division in the hope that soon all new construction and much of the substantial rehabilitation of housing will become barrier free. With such a high number of older and historic structures in our jurisdiction, some reasonable



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adjustments will need to be designed so as not to doom valuable buildings in this effort.

According to the 2000 Census figures, 2,190 individuals in Danville suffer from some form of mental disability. In fact, studies have shown that approximately 2-3% of the general population has some degree of mental developmental retardation. Crosspoint Human Services is the primary provider of group home living, case management, counseling and family support services as well as developmental and vocational training to persons with mental health issues and/or developmental disabilities in the Danville area. Currently, over 80 individuals are in group home living arrangements in Danville. The demand for these types of services is expected to increase slightly in the immediate future. There is a critical need in this community for additional apartment facilities wherein individuals can live independently while receiving minimal assistance for their developmental or mental health challenges.

Conclusion D 4 – An inadequate supply of handicap accessible housing is an impediment to the disabled.

Recommendations: 1. Continue the current Accessibility Modifications grant program for low-income households to carry out at least five grant funded accessibility modifications projects each year. 2. We commit ourselves to the promotion of and adoption of no less than a visitability standard in the local building code for new construction and substantial rehabilitations as set forth in P.A. 94-283, the Illinois Environmental Barriers Act. **This is not intended to supplant nor circumvent any more stringent requirements.** 3. Encourage and assist qualified providers in maintaining and expanding the number of housing units which include supportive services for those with disabilities. **4. See to it that the City's Building Inspector is adequately educated in accessibility design and the requirements of the Fair Housing act and Section 504 of the Rehabilitation Act and including those considerations in plan designs, permit approvals and construction inspections.**

E. Unfair Real Estate & Lending Practices

1. Housing Advertising – We monitored the housing for sale and for rent classified advertisements of the local daily newspaper for a two-week period in July 2010. There were as follows;

Houses for Sale	240
Houses for Rent	146
Apartments for Rent	244
Rooms for Rent	<u>31</u>
TOTAL	661



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Of these only 34 advertisements carried the Fair Housing Logo or any other indication of a seller's /lessor's adherence to fair housing laws. Three of the apartment for rent advertisements stated "No Section 8" right in the ads. None of the others appeared to contain language that would indicate bias or elements designed to discourage specific applicants or classes.

Conclusion E1 – While most housing advertising lacks the Fair Housing Logo, only a small portion declares a bias against federal subsidy, most appear neutral.

Recommendation – Interact directly with the Danville Area Board of Realtors and its members to encourage a broader understanding of Fair Housing Standards and use of the logo with a commitment to live up to what it symbolizes.

2. Mortgage Lending – The following table is made up of data for the 2008 year as provided by the Home Mortgage Disclosure Act files.

Race & Gender	No. of Apps.	\$000	Loans Originated	\$000	Apps approved, not Accepted	\$000	Apps Denied	\$000	Apps Withdrawn	Apps Incomplete
African American Male	10	494	8	442	0	0	1	15		1
African American Female	7	387	3	171	0	0	4	216	0	0
White Male	170	10508	110	6862	8	648	35	1710	13	4
White Female	112	6032	83	4620	6	247	19	886	2	2
American Indian Male	1	10	1	10	0	0	0	0	0	0
American Indian Female	3	129	1	43	1	78	1	8	0	0
Asian Male	2	78	2	78	0	0	0	0	0	0
Asian Female	1	250	0	0	0	0	1	250	0	0
2 or More Races	1	90	1	90	0	0	0	0	0	0
White/Minority	7	420	6	370	0	0	1	50	0	0

The only gender figure in the table above that stands out boldly and does not seem to run symmetrical to the make-up of our population is in the loan applications denied for African American females, with four out of seven having been denied. That represents a 57% denial rate when the rate of denial for African American males was 10%, white males 21% and white females 17%. With only one Asian female application recorded, its denial is impossible to interpret. If we remove gender and analyze this strictly based upon race we find the denial rate for whites at 19% while the denial rate for African Americans is at 29%. In most cases overall and in all the applications of African Americans the reason for denial was listed as either credit history or debt-to-income ratio. Both those reasons for denial involve the borrowers



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preparation and readiness to borrow, both of which can be enhanced through education and counseling.

Conclusion E2 – 1. A higher denial rate for African Americans, and more specifically female African Americans persists. 2. Credit history and debt-to-income ratio continue to be that cause for most mortgage denials

Recommendations – 1. Continue to monitor lenders for racial and/or gender bias, and make fair housing rights information and the Human Relations Commission's services readily available to racial minorities. 2. Support and assist homebuyer education and financial literacy information available to minority populations. To facilitate this, the Community Development Division will offer homebuyer education and financial literacy courses each year at no cost to the participants. These classes will begin in early 2012 and continue indefinitely.

3. Foreclosures - The City of Danville has tracked and studied every foreclosure filed since August 2008. There have been 253 foreclosures initiated in that time, and they are remarkably evenly distributed throughout the City's residential neighborhoods with no discernable economic or ethnic patterns other than there does appear to be fewer in the neighborhoods in which we find the highest traditionally African American population, not necessarily so for neighborhoods trending toward younger and growing African American populations. This may be reflecting the clear fact that foreclosures have hit younger households while many elderly are no longer mortgaged at all. Strangely the average default judgment of the foreclosures is about the same as the median sale price citywide, which when we examine the numbers by neighborhoods and individual properties it appears homes are being foreclosed very near their actual market value. What is interesting is that fully 68% of the foreclosures in that period involve lenders best known for their sub-prime mortgage products. We are reasonably certain that sub-prime mortgages are responsible for no less than the 68% of foreclosures attributable to a few top names. See the map on the following page for a visual sense of the distribution of these foreclosures.

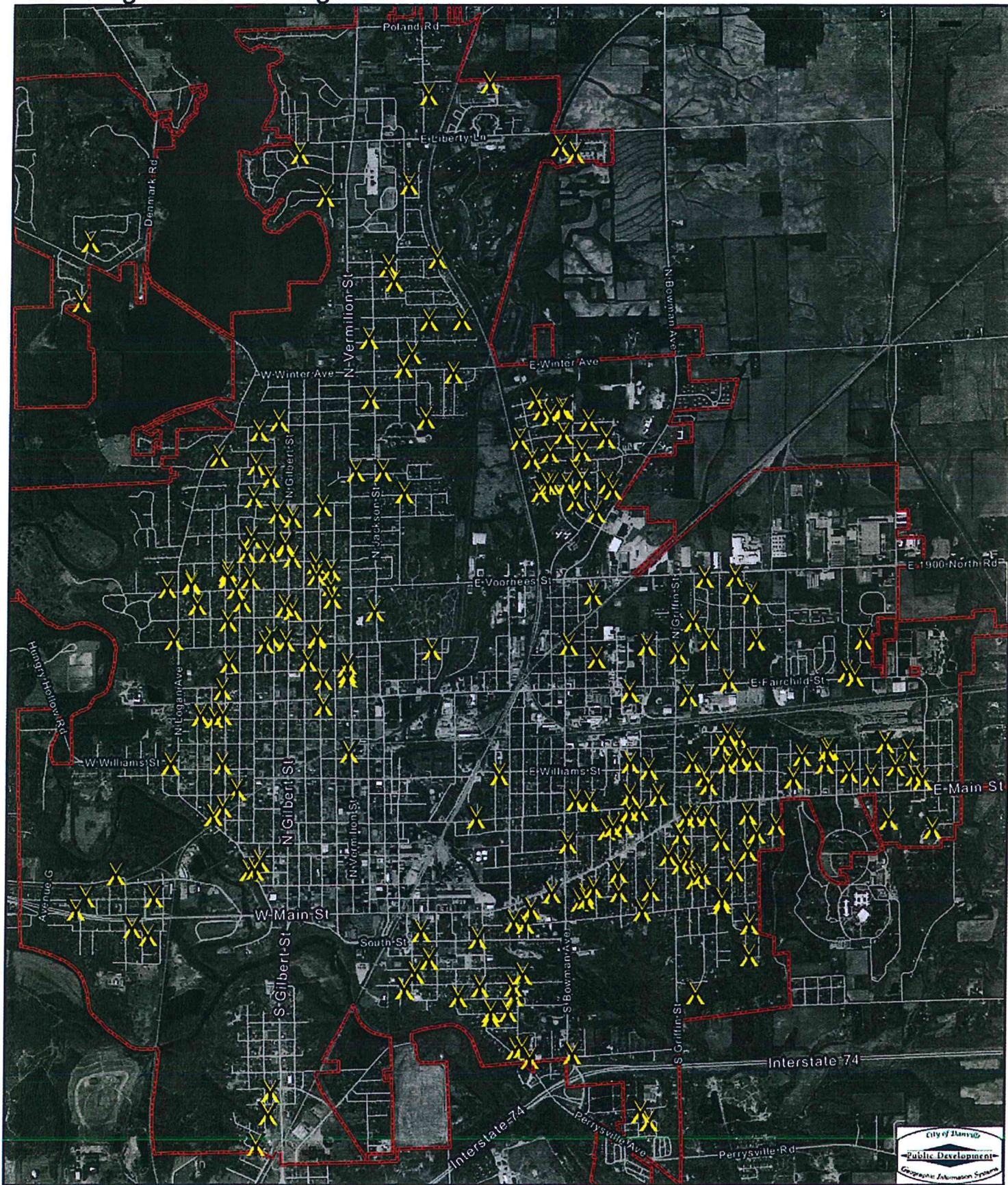


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Locations of Foreclosures in the City of Danville from August 2008 to August 2010

Created:
October 4, 2010





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Conclusion E3 – Subprime loans are an impediment to the long-term success of some buyers

Recommendation – Educate the public on the dangers of subprime, reverse amortization and other mortgage “gimmicks”. To facilitate this, the Community Development Division will offer homebuyer education and financial literacy courses each year at no cost to the participants. These classes will begin in early 2012 and continue indefinitely.

F. Household Income & Other Economic Factors

1. Low Income Households – Chapter 4, B-5 of this Analysis reveals that the City has 18% of its population living in poverty, nearly double the State of Illinois rate. Nearly all of that portion of the City located south of Voorhees Street has median household incomes of \$35,000 per year or less. Two residential census blocks within the Jackson-Bowman Corridor have median incomes at or below \$15,000. It should also be noted that only a tiny portion, (1.6%) of the housing in those blocks is public housing, it is mostly private market. Although Danville still has rental units available for \$350 per month, and homes purchasable for less than \$40,000, this means that a number of households are still housing cost burdened. With an annual household income of \$15,000, that housing cost burden comes at a rent/house payment amount of \$375. Similarly, homebuyers using conventional mortgages become housing cost burdened in anything with a mortgage of more than \$30,000. The City still has houses that can be purchased for \$30,000, but it is unlikely any of them would be without maintenance needs of some urgency. In both the purchase and rental housing options, these low-priced housing units will not likely to be found in the northern portion of the City.

Conclusion F 1 – Lack of sufficient income is an impediment for some. **Data indicate that this is most critical in portions of the City with the poorest housing and highest minority population.**

Recommendation: Continue to assist economic development projects, job creation and employment training initiatives and any measures that may raise household incomes. **Monitor the new jobs reports of those who receive Economic Development Assistance of any type, with requirements for them to document their recruitment efforts among Danville’s low-income and minority population.**

2. Credit Worthiness and Household Utilities – Our consultation partners in public assistance programs, special needs populations, realty, housing cost assistance, etc. all uniformly report that credit reports and scores are being used by all financial institutions providing housing related loans and most investor-owners of rental



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housing. Applicants with severely damaged credit are frequently low income and often not approved for homebuyer loans or rentals.

Many of these cases involve delinquent utility bills. We have seen the number of housing units with utilities provided within the rent structure wither to almost zero over the past twenty years. We are aware of only twenty apartments in the entire City wherein full utilities are provided. One major obstacle in this regard is the fact that utility assistance funds are restricted to current accounts. Hence, once a householder suffers a utility shut-off, that householder no longer can receive utility assistance and cannot get utility service restored until the delinquent amount is cleared. Homelessness frequently follows. Getting those persons back into permanent independent housing is frequently contingent upon their ability to establish utilities accounts, a near impossibility in cases where old delinquent accounts still exist in the person's name. Many of our partner agencies in the development of this Analysis reported this as a major obstacle.

Another interesting twist on this is that some social service providers, and also the City's own Department of Public Development report inquiries and telephone calls from frustrated renters who believe that withholding rent payments is a method by which to press the investor-owner into affecting repairs. In our consultation with the owners and managers of rental housing they also confirmed that they encounter this from some of their renters, and are also told of it when interviewing prospective renters with poor records of payment. Believing that withholding rent payments can leverage the desired corrections some of these people damage their credit and sometimes get evicted as a result. The records of those consequences then work against them in securing future housing.

Conclusion F 2 - Damaged credit and delinquent utility accounts stand as an impediment to many.

Recommendations – 1. Support and encourage financial literacy education and credit repair counseling. 2. Strive with community partners such as the Salvation Army, East Central Illinois Community Action Agency, and the local United Way to build some form of utility assistance that can clear closed delinquent accounts for those who need to return to independent housing. 3. Educate renters in effective methods to secure repairs and corrections, and inform them that withholding rent can potentially harm them more than it might influence the investor-owner.

3. Security Deposits – In the past five or so years there has been a shift in security deposits for rental housing. Whereas the earlier, traditional standard was commonly the sum of the first month's rent and an equal amount in the form of a security deposit, today the demand for first month's rent, last month's rent plus a deposit is growing. If we use the \$365 per month rent figure that is fairly common in our City,



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this means that the up-front cash need to rent many units has shifted now from \$730 to \$1,095. This makes it additionally difficult for low income persons to initially secure housing.

Conclusion F3 – High up-front rental fees are an impediment to some.

Recommendation – 1. Encourage investor-owners to find other, more creative ways to secure their investments apart from up-front cash. 2. Offer financial literacy education and money management advice to low-income populations to empower them to prepare and remain prepared for housing disruptions and replacement costs.

G. Racial-Ethnic Distribution

1. **Current Patterns** – In Chapter 4,C,1 of this Analysis, beginning on page 25, we demonstrated that racial minorities are disproportionately located in the southern half of the City. In C,5 of that same Chapter, (page 35), we then examined poverty status by race and the percentage of the population below poverty level by Census Block Group to find that the resulting G.I.S. map, (page 37), reveals a pattern very similar to that of the highest minority population in general, as found on the map on page 27. Next we charted income by race in C,7, on page 44. This revealed a disparate percentage of African-American households with incomes below \$30,000 per year as compared to both white and Hispanic households. The final cross-analysis was the addition of the data on housing type, age and condition found in Chapter 4,D,2&3 beginning on page 49. This section also includes a table on the condition of housing units comparing the northern and southern halves of the City.

Conclusion G1- The patterns of three factors; minority racial status, low income, and residential concentration in the southern half of the City where housing conditions are the poorest, are stubbornly consistent. Similarly, the factors of low income and poor housing follow each other even when race is not considered, and the same is true of the remaining one-on-one comparisons made between any of two of these three factors. While not ignoring that race may be an additional factor, it appears that the combination of concentration in areas of poor- condition housing and low income is the common characteristic.

Recommendations – 1. Pursue all aspects of economic development, job creation and educational advancement for low income persons, specifically those most suitable for racial minorities. 2. Continue our commitment to direct housing rehabilitation, redevelopment and accompanying infrastructure



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improvements into the residential neighborhoods in the southern portion of the City.

H. Personal, Social & Background Considerations

1. Personal and Social Features - Records were obtained from the five principle agencies providing services to those with mental health, social, developmental or substance abuse issues. The five are Crosspoint Human Services, Your Family Resources Connection, the Center for Children's Services, Prairie Health Systems and Worksource. During the period from December 1, 2008 until November 30, 2009 those five agencies alone served 3,442 persons who reported a residence within the City of Danville. Those same agencies served 1,402 residents of Vermilion County who did not reside within the City, which illustrates the disparate distribution of persons requiring those services. While the City of Danville houses 38% of Vermilion County's population, the City also is home to 74% of persons seeking those human services listed above. Interviews, records of fair housing complaints, and client records of those serving people with such special needs all agree that there persists some prejudice, or at least reluctance on the part of some to rent to, sell to or live near persons with such needs. Nimbyism displayed at zoning hearings that involve group homes, supportive living complexes, mental health centers and half-way houses all clearly indicate that type of prejudice still exists. Over the most recent past decade three such public hearings have taken place right here in Danville and each was marked by the comments of those unwilling to accept these people in their neighborhoods.

Conclusion H1– The City is home to a sizable population of persons with mental health, developmental, social and substance abuse challenges. There are still those in the housing business who consider these individuals undesirable.

Recommendations – Support the providers of housing who do not hold these prejudices and strive to dispel the myths and stereotypes behind this impediment to these special needs populations. Community Development will request that the Human Relations Commission explore the subject and come up with recommendations, amongst which may include adding some or all as protected classes under the local fair housing ordinance.

2. Legal Background Considerations - Informal interviews conducted within the research for this Analysis also revealed what we found a number of investor-owners and some realtors who were unaware of the additional protected classes the State of Illinois added to its Human Rights Act. Three new classes have been added; they are order of protection status, military status and sexual orientation.



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It seems that there are still some managers and owners of rental housing that still refuse to rent to women under orders of protection. While criminal background has been a cause for refusal for some time, and is still not prohibited by law, denial to women under orders of protection is discrimination against a crime victim, and as such, quite another concern. Investor-owners who agreed to be interviewed told staff that some that have rental housing available will check the court records of the County Circuit Court. While this has been customary for many years as a way to discover eviction orders and suits for recovery of unpaid rents, it has also been used to block women under orders of protection from renting housing. All those we talked with claimed they were unaware of the new state prohibition on this cause for denial.

Conclusion H2 – Newly protected classes under state law are still enduring housing discrimination.

Recommendation – 1. Provide information and education on these changes to those in the housing business throughout the City 2. Remain watchful for this form of discrimination through the Human Relations Commission and Community Development offices.

I. Public Housing

The City's Five-Year Consolidated Plan passed in 2010 proposes replacement of the Danville Housing Authority's largest family housing complex, Fair Oaks.

Fair Oaks, built in 1942, is representative of the oldest configuration of public housing complexes in the nation, made up of multi-unit, "townhouse" style apartment buildings arranged in a dense and now economically isolated area of the City's east-side. Twenty-five years ago there were many well-paying industrial jobs within walking distance from the Complex, specifically along East Fairchild and East Voorhees Streets. Very few of those remain today. The neighborhood food store is closed, and the residential neighborhood immediately to the east is now less than 40% owner-occupied. Fair Oaks contains 326 family units on a land-base of approximately .07 square miles. No other place in the entire City of Danville is so densely populated. The Fair Oaks Complex contains an average of 23,750 persons per square mile while the residential neighborhood directly west of it, the Northeast School Neighborhood averages 5,237 persons per square mile. The Northeast Neighborhood is a compact development of two and three-bedroom small single-family detached houses built in the 1950s-60s, and pretty typical of the density found throughout residential areas of the City overall. Attached is a map labeled "Attachment A", showing the population density of the area by census blocks. Note that the red area directly north and east of the intersection of Fairchild Street and Fowler Avenue is the Fair Oaks Complex.



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The next map, labeled “Attachment B”, illustrates the concentrations of African-American Only households in Fair Oaks and an even broader surrounding area of the City containing many affordably priced housing units of varied type. This is done by Census Block using 2010 data and clearly shows that Fair Oaks and its immediate neighboring property to the north, which is Green Meadows Apartments Section 8 housing. The map shows that the African-American population in Fair Oaks is three-times the 30.1% of the City at-large, and more than double that of the Northeast Neighborhood to the immediate west, wherein African-American households comprise just 41% of all households in the neighborhood.

In an effort to understand the make-up of the Complex and the persons within it, we next analyzed 2010 Census data by blocks for the portion of total population under fifteen years of age. The map labeled “Attachment C”, reveals that 54% of the persons living in Fair Oaks are under fifteen years old, double the 26% in the Northeast Neighborhood to the west. Next we present a map of family households headed by females with no husband present, labeled “Attachment D”. The figure within Fair Oaks is 81%, while the surrounding residential neighborhoods average less than one third of that concentration, at 25%. The City at large is 8.4% making Fair Oaks nearly ten times the level of the remaining City, an alarming concentration of one specific type of household. Examination of 2010 census results also revealed that the concentration of householders both under age twenty-five and with household incomes of less than \$10,000 per year is completely out of step with other residential areas of the City and the City at-large. The tract containing the Fair Oaks Complex contained 202 such households or 15.73%. The next highest tract in the entire City contains only 51 such households or 2.89%. Most tracts are at 2% or less.

To summarize the data listed above, the Fair Oaks Complex is disproportionately populated by young African-American females with children and extremely low incomes. The income levels are so low that it appears very few have incomes from employment at all. Add the population density and other factors noted and Fair Oaks becomes a bleak picture of unplanned racial segregation, economic isolation, and a non-diverse environment in which great numbers of children are growing up with a view from their windows of a community that does not resemble the City or the Nation at all. The desperation that this facility represents is known by the local population, such that even the extremely-low income persons who might avail themselves of it are reluctant to do so. In an article published September 16, 2011 in the Danville Commercial News Danville Housing Authority Greg Hilleary said, “...the authority has more of a problem attracting Vermilion County persons to Fair Oaks due to the stigma of crime and other problems. People from outside the County sometimes think Fair Oaks is better than where they had been living.”

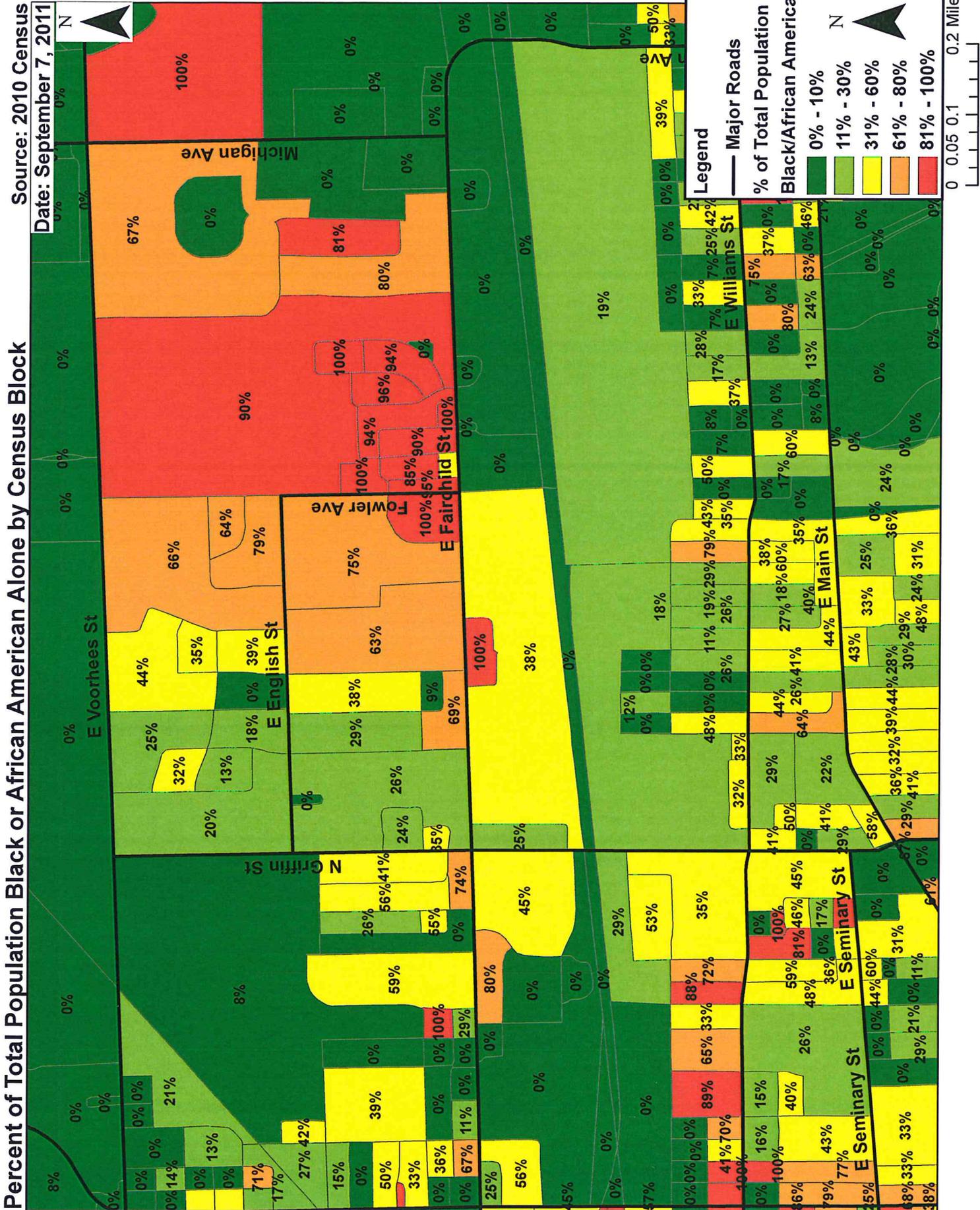
Conclusion - It is clear that de-densification and de-concentration of this isolated population is necessary if any within it are to succeed.



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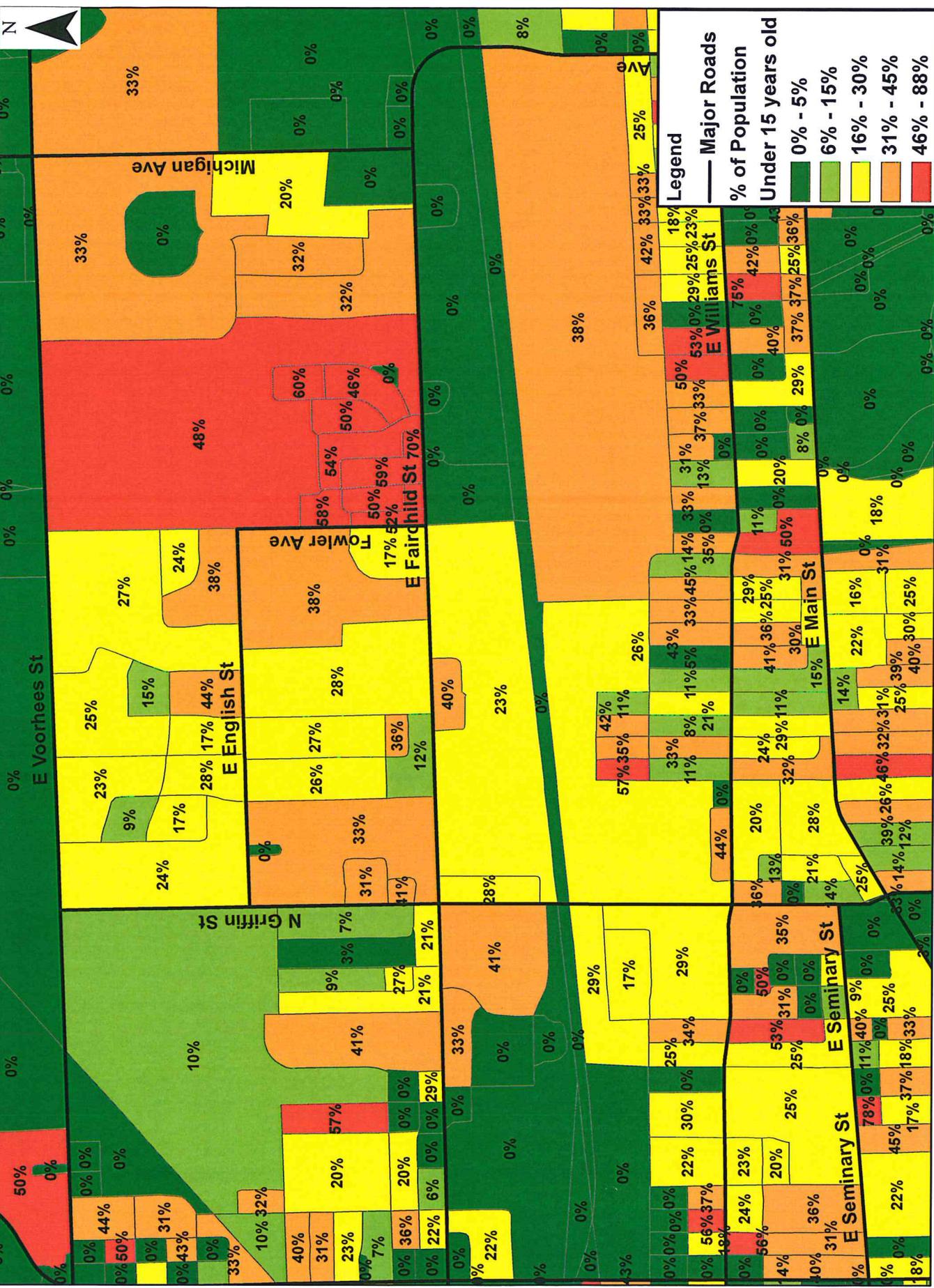
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Recommendations – **As stated above**, we propose; **#1** that the replacement of the Fair Oaks Complex with more diverse, scattered site, and economically-mixed housing units is necessary to remedy what the Complex has become, an Impediment to Fair Housing in and of itself. **#2** We also propose to consult with our community partners and stakeholders to pursue providing educational programs specifically designed for these young adult residents to assist them in moving to employment.



Percent of Total Population Under 15 by Census Block

Source: 2010 Census
Date: September 7, 2011



Legend

— Major Roads

% of Population Under 15 years old

- 0% - 5%
- 6% - 15%
- 16% - 30%
- 31% - 45%
- 46% - 88%



ATTACHMENT "D"

Percent of Total Households per Block that are Family Households with a Female Head of Household and No Husband

Source: 2010 Census
Date: September 7, 2011

