

Diverse Communities: One County

An Analysis of Impediments to Fair Housing
Choice in Madison County, Illinois
2010

Conducted by the Metropolitan St. Louis Equal Housing Opportunity Council
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November 2010

D I V E R S E C O M M U N I T I E S : O N E C O U N T Y**An Analysis of Impediments to Fair Housing Choice in Madison County****Table of Contents**

Introduction	4
Fair Housing Laws	7
Fair Housing Act	7
Other Federal Laws Relating to Fair Housing	8
State Laws	9
Local Laws	10
Profile of Madison County	11
Geography and Major Industries	11
Demographic Profile	12
Housing and Land Use	21
Education	29
Transportation	31
Fair Housing Complaint and Investigation Data	35
Fair Housing Complaints Filed	35
Case Spotlights	37
Review of Advertisements	38
Review of Housing Discrimination Testing	38
Review of Zoning Practices	40
Review of Lending Patterns	41
Examination of Community Attitudes and Education on Fair Housing	44
Review of Practices and Policies Contributing to Racial Segregation	49
Evaluation of County Fair Housing Activities	52
Identification of Impediments to Fair Housing Choice and Recommendations	54
Fair Housing Planning and Implementation: An Ongoing Public Process	54
Fair Housing Education: Vital to Ending Discrimination	56
Ensuring that the Housing Market is Open to All Regardless of Protected Class	57
Moving to Opportunity: Ending Concentrated Poverty and Segregation	58
Ending Exclusionary Practices and Policies	60
Increasing Educational Equity: Housing Policy Is School Policy	61
Supporting Stable, Integrated Communities	62
Reinvestment: Bringing Opportunities to Low Wealth Areas	63
Creating Access: Preparing for the Senior Boom	64
Integration for Persons with Disabilities: Making Good on the Promise of <i>Olmstead</i>	65
Equal Access for Limited English Proficient Residents	66
Creating Sustainable Communities and Preserving Green Space	67
Notes	68

I. INTRODUCTION:

The U.S. Department of Housing & Urban Development (HUD) requires a study every three to five years examining the impediments to fair housing choice in jurisdictions receiving funding through the Community Development Block Grant (CDBG) program. Entitlement jurisdictions must also certify that they are working to affirmatively further fair housing. The information, analysis and recommendations for action are to be incorporated in a jurisdiction's Five Year Consolidated Plan and in annual action plans.

The 2010 Madison County Analysis of Impediments to Fair Housing Choice Study was conducted by the Metropolitan St. Louis Equal Housing Opportunity Council (EHOC), a nonprofit fair housing organization that serves the entire metropolitan St. Louis region. EHOC is a registered Fair Housing Initiatives Program (FHIP) through HUD and is empowered to conduct housing discrimination investigations using housing discrimination testing. EHOC also accepts complaints of housing discrimination and assists people who have experienced discrimination.

Purpose of this Study:

The purpose of this study is to analyze and eliminate housing discrimination within Madison County; to promote fair housing choice for all persons; to provide opportunities for inclusive housing patterns; to promote housing that is accessible for persons with disabilities; and to foster compliance with the nondiscrimination provisions of the Fair Housing Act.

The Department of Housing and Urban Development (HUD) requires that entitlement jurisdictions conduct an Analysis of Impediments to Fair Housing Study every three to five years, and to certify on an annual basis that the jurisdiction is affirmatively furthering fair housing. The last study was conducted by Madison County in 2000.

This study is meant to provide the basis for planning using the consolidated planning process. This year, the study was conducted in a way that it can be used as a living document to elicit constant feedback and community participation to provide the basis for conducting future AI studies in a manner to maximize inclusion.

A New Vision:

This AI Study spells out a bold new vision for affirmatively furthering fair housing in Madison County. The recommendations in the study provide measurable activities that can help gauge success. To implement the recommendations will take some more resources than Madison County has regularly

allocated to fair housing, but not an amount that is unsustainable or unrealistic. More than resources, however, implementing the recommendations will require moral leadership; a commitment to creating diverse and inclusive communities and to ensuring fair housing at all levels of government; a willingness to try new ways of doing things; methods of evaluating and tracking implementation and success; and an ability to tackle hard issues of historical exclusion in a sensitive and helpful way.

Why dedicate ourselves to these tasks? one might ask. It would certainly be easier to continue on as we have done in the past. We must understand that the context has changed, and we must change with it. In 2006, a fair housing organization and a nationally recognized fair housing legal firm sued Westchester County, New York, under the False Claims Act, for falsely certifying that it was “affirmatively furthering fair housing.” The case alleged that the County had not analyzed patterns of racial segregation and exclusion in its community, that it had not taken actions to overcome these historical patterns, and that furthering affordable housing goals did not constitute “affirmatively furthering fair housing.” In 2009, the Honorable Denise Cote issued a ruling that the County had “utterly failed” to meet its affirmatively furthering fair housing obligations and that the County was prohibited from ignoring residential racial segregation and municipal resistance to affordable housing development that stymies the possibility of changing those patterns. The case resulted in a \$62.5 million settlement, which amounted to more than the County had received in Community Development Block Grant funds during the period at issue in the suit.¹ Moreover, after the judge's ruling, HUD initiated a lawsuit against Westchester County, demonstrating for the first time in a substantive way that HUD was committed to enforcing its requirement that entitlement jurisdictions “affirmatively further fair housing.”

With the new Obama administration in office, the U.S. Department of Housing and Urban Development has begun to demonstrate its commitment to affirmatively furthering fair housing throughout all divisions of its operations. Grant opportunities through the Sustainable Communities Initiatives (SCI) require a regional approach for furthering fair housing in order to be awarded this competitive grant. The fair housing approach occurs in collaboration with transportation, housing and environmental planning. The proposed Transforming Rental Assistance (TRA) program and the Money Follows the Person (MFP) initiatives have fair housing components, by requiring mobility counseling and transitioning persons in nursing homes into community-based, integrated settings.

Clearly, more is being required of us to finally realize the vision of the Fair Housing Act. It is worthwhile to remember the words of the Act's sponsor, Sen. Edwards Brooke:

What adds to the murk is officialdom's apparent belief in its own sincerity. Today's Federal housing official commonly inveighs against the evils of ghetto life even as he pushes buttons that ratify their triumph—even as he ok's public housing sites in the heart of the Negro slums, releases planning and urban renewal funds to cities dead-set against integration, and approves the financing of suburban subdivisions from which Negroes will be barred. These and similar acts are committed daily by officials who say they are unalterably opposed to segregation, and have the memos to prove it....But when you ask one of these gentlemen why, despite the 1962 fair housing Order most public housing is still segregated, he invariably blames it on regional custom, local traditions, personal prejudices of municipal housing officials.²

By taking some of the steps outlined in this AI, Madison County will position itself as a competitive applicant for such federal programs. More importantly, refocusing our efforts will help to create more inclusive, diverse and sustainable communities in our county and will stop the trend of creating “winner” and “loser” communities,³ where not all persons have equal access to educational, housing, and employment opportunities. Taking a new approach is a risk, but continuing to do what has always been done also presents a risk in a society that is changing. We will not do this alone. There are many local governments throughout the country that have paved the way for new approaches and that can be used as models.

Regarding Language Used:

Throughout this study, the terms White, Black, Asian, Hispanic, American Indian / Alaska Native and Native Hawaiian / Pacific Islander are used, consistent with the practices and data of the U.S. Census Bureau. The term “multiracial” is used to denote persons of more than one race, simply because the term is shorter than that used by the U.S. Census Bureau. The term “person with disabilities” is used rather than the antiquated word “handicap” used in the Fair Housing Act statute.

II. FAIR HOUSING LAWS

A. The Fair Housing Act⁴

The Fair Housing Act was passed by Congress in 1968 in the wake of Dr. Martin Luther King, Jr.'s assassination. At the time of its passage, it protected people from discrimination on the basis of race, color, religion and national origin. In 1974, the Act was amended to include gender ("sex") as a protected category, and in 1988 the Act was further amended to include protections for pregnant women and families with minor children ("familial status") and persons with disabilities ("handicap").

The Fair Housing Act covers almost all types of housing, regardless of their funding source. People seeking to rent a home or purchase a house or condominium are protected from discrimination as are individuals living in public housing, dormitories, group homes, assisted living communities, skilled nursing facilities, transitional housing and some types of homeless shelters. Exceptions from some of the provisions of the Fair Housing Act exist for owner occupied buildings with four or fewer units, or in cases when someone is renting out three or fewer single family homes or buying or selling their own home without the use of a real estate agent or a broker. Housing that qualifies as housing for older persons (where everyone living there is 62 years or over, or 80% of units are occupied by at least one person who is 55 or over) are exempt from the familial status provisions of the Act unless they are federally subsidized (in which case they have to allow an otherwise eligible head of household who has a minor). Religious organizations or membership clubs that operate housing for a noncommercial purpose for their members are also exempt from the some of the requirements of the Act, as long as they don't discriminate in their membership criteria on the basis of race or national origin. There are no exemptions to the advertising provisions of the Act, so even the above types of housing that may be exempt are unable to advertise in a discriminatory way.

The Fair Housing Act also applies to mortgage lending and other residential-related financial transactions, such as the provision of homeowners insurance and appraisals. Local, state and federal governments are also subject to the Act, and must not discriminate in the provision of housing as well as in zoning practices.

The Fair Housing Act makes it illegal to engage in the following acts due to a person's protected class:

- refuse to rent, sell or negotiate for housing;
- deny availability of housing;
- set different terms or conditions in housing;
- restrict one's choice of housing;
- make, print or publish advertisements indicating a preference, limitation or exclusion;
- make discriminatory statements;
- engage in "blockbusting" practices;
- engage in discriminatory land use or zoning practices;
- discriminate in residential real estate-related transactions;
- to otherwise deny or make housing unavailable.

In addition, the Act has affirmative obligations for housing providers to grant reasonable accommodations or modifications for persons with disabilities and for those involved in the creation of new housing to design and construct multifamily (4+ attached units) built for first use after March 13, 1991, in a way that provides a basic level of accessibility or adaptability for persons with disabilities. The Act also prohibits intimidation or interference with anyone exercising their rights under the Act.

Section 808(d) of the Fair Housing Act requires all federal agencies to administer programs and activities relating to housing and urban development (including federal agencies having regulatory authority over financial institutions) in a manner “affirmatively to further” fair housing. Similarly, Section 808(e)5 requires the Secretary of HUD to “administer the programs and activities relating to housing and urban development in a manner affirmatively to further the policies of this subchapter.” In order to comply with this section, HUD has issued a Fair Housing Planning Guide to assist entitlement jurisdictions participating in programs such as the Community Development Block Grant or HOME, to identify impediments to fair housing through an AI study such as this and to use the information collected in the consolidated planning process in order to ensure that communities are not only complying with fair housing laws, but taking measures to “affirmatively further fair housing” and reverse patterns of segregation and discrimination.

B. Other Federal Civil Rights Laws Relating to Fair Housing⁵

The Civil Rights Act of 1866 affords all citizens the same right to inherit, purchase, lease, sell, hold, and convey real and personal property as is enjoyed by white citizens. The Act is still relevant today in race cases that are exempt from the Fair Housing Act.

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs and activities receiving federal financial assistance. This is relevant mainly in the context of ensuring that persons with Limited English Proficiency have equal access to federal programs and services, including housing related programs.

Section 504 of the Rehabilitation Act prohibits discrimination based on disability in programs or activities receiving federal financial assistance. This requires housing providers that receive federal financial assistance (such as public housing, Project Based Section 8, housing built under Sections 202 / 811, USDA housing) to pay for reasonable modifications for persons with disabilities in housing and requires that 5% of all housing be fully accessible for persons with mobility impairments and 2% for persons with hearing and visual impairments. These requirements offer a higher level of accessibility than the Fair Housing Act standards.

Section 109, Title I, Housing and Community Development Act of 1974 prohibits discrimination in HUD's Community Development Block Grant program based on race, color, national origin, sex or religion.

Title II of the Americans with Disabilities Act prohibits discrimination based on disability in programs and activities of public entities and relates state and local public housing. Title III of the

Americans with Disabilities Act prohibits discrimination based on disability in public accommodations, including rental or sales offices.

The **Age Discrimination Act of 1975** prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance. With the exception of the 1866 Civil Rights Act, all of the above laws are enforced by the U.S. Department of Housing & Urban Development. Other federal agencies may have jurisdiction as well.

The **Community Reinvestment Act** requires depository institutions (banks) to meet the credit needs of the communities in which they operate, specifically examining lending to low- and moderate-income persons and communities and examining any discriminatory practices. The CRA was passed in 1977 to combat redlining practices. Banks are regularly assessed for performance under the CRA, and poor ratings can inhibit a bank's ability to acquire other branches, expand services or merge. Regulators are required to take public comment into account on any bank applications. CRA, the **Home Mortgage Disclosure Act**, and the newly passed **Wall Street Reform and Consumer Protection Act** also require lenders to disclose data on lending based on income, race, gender and other factors. This data has been a major source for ensuring compliance with fair lending laws.

C. State Laws

Illinois Human Rights Act⁶

The Illinois Human Rights Act protects people from discrimination in real estate transactions on the basis of race, color, religion, gender (sex), national origin, familial status, disability, age (40+), ancestry, marital status, military status / unfavorable discharge from the military and sexual orientation. The Act covers more properties than the Fair Housing Act does, as it covers not only housing, but non-housing real estate as well, including land and commercial real estate. Exemptions in the Illinois statute are similar to those under the federal law.

Illinois Accessibility Code

The Illinois Accessibility Code⁷ applies to all housing units owned or financed by a governmental unit that consist of five or more dwelling units on each project site. The Code applies to new construction as well as rehabilitation when governmental unit financing is part of the loan package. The code requires that all site improvements be accessible, including an accessible route to an accessible entrance from parking, public transportation stops and / or a public sidewalk; the installation of a permanent audible and visual emergency warning system in all public and common use areas; and the provision of 20%, or at least one (whichever is greater), of adaptable dwelling units, distributed throughout the building to provide a variety of sizes and locations. Particularly for rehabilitation projects, in which the Fair Housing Act does not apply, the IAC is important because it requires "adaptable" units be provided, which is not a requirement of Section 504, requiring only 5% of units to be fully accessible for persons with mobility impairments (a higher level of accessibility covering fewer units) and 2% for persons with visual and hearing impairments.

D. Local Laws

Madison County has no fair housing or human rights ordinance and does not have a Human Relations Commission, but several local communities within Madison County do.

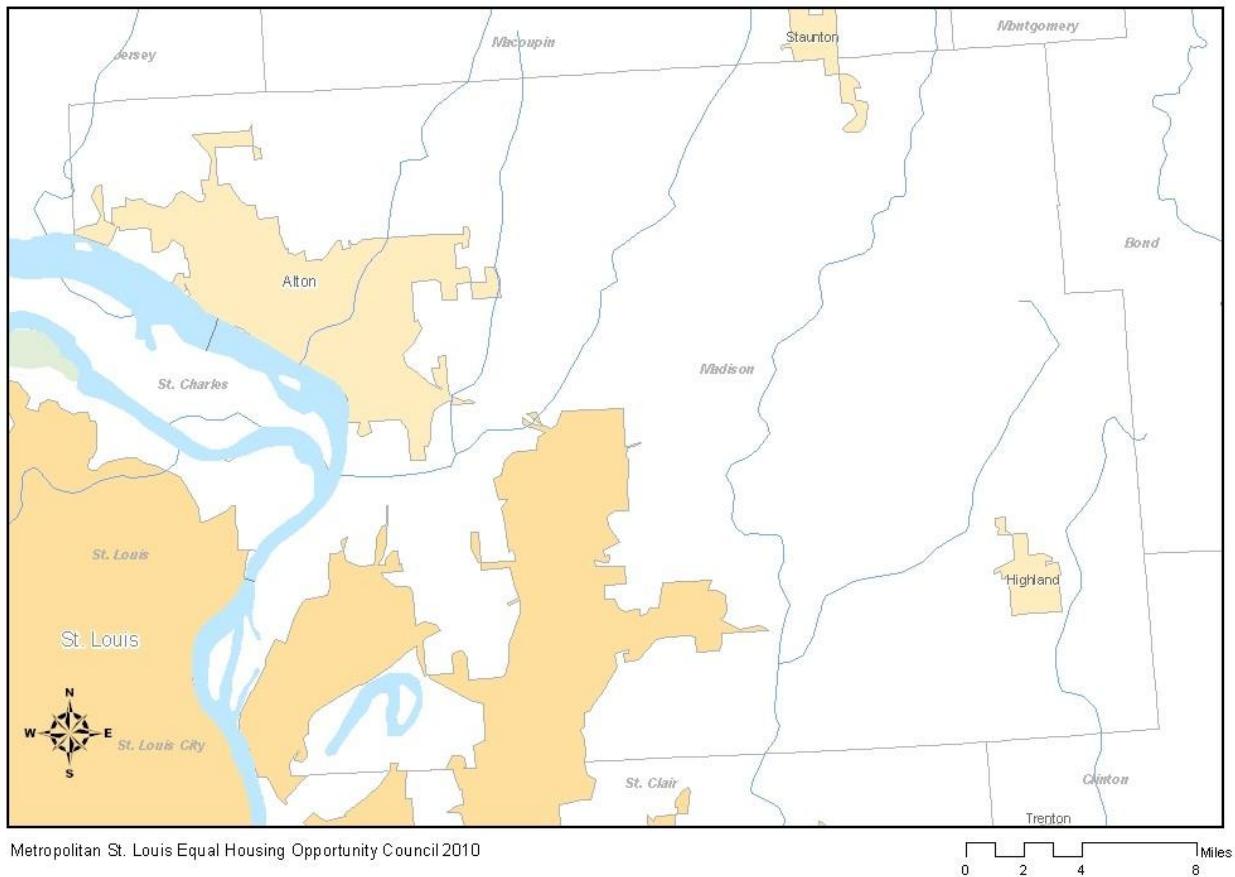
The City of Alton established a Human Relations Commission in 1990 with a purpose of promoting “equality and justice, and to secure an end to discrimination by reason of religion, sex, age, physical or mental handicap, political affiliation, race, color, creed, national origin, income, marital status, sexual harassment or sexual orientation.”⁸ The commission is meant to “encourage wise adjustments to social problems and opportunity, including equal opportunity in housing and employment.”⁹ The commission is authorized to investigate and offer suggestions of resolutions with regard to any complaints of unfair discrimination.

The City of Collinsville has a fair housing ordinance which prohibits housing discrimination on the basis of race, color, religion and national origin. Acts prohibited by the ordinance are similar to the Fair Housing Act before the 1974 amendment. The ordinance also establishes a Human Relations Commission which is authorized to investigate violations, to recommend that the City Council seek a temporary restraining order or injunctive relief when there is reasonable cause to believe that unfair real estate practices have occurred or will occur, to hold public hearings, to make recommendations regarding granting, suspension and revocation of real estate broker's licenses, to eliminate unfair real estate practice by conciliation, conference or persuasion, and to issue reports every six months.¹⁰

The City of Edwardsville has a fair housing ordinance which prohibits discrimination on the basis of race, color, religion, national origin and ancestry, as well as a Human Relations Commission which is empowered to investigate, conciliate report and refer to the city attorney for prosecution. There is a maximum penalty of \$750 for violations.¹¹

Madison County issues a fair housing resolution each year, and requires participating jurisdictions to issue fair housing resolutions as well. Madison County sends out a sample resolution for jurisdictions to adopt.

Madison County, Illinois



III. PROFILE OF MADISON COUNTY

A. Geography and Major Industries

Madison County is located in southwest Illinois, in the St. Louis Metropolitan Statistical Area (MSA) which covers both Missouri and Illinois. Its western border is the Mississippi River. Of the two urban counties on the Illinois side of the St. Louis MSA (along with St. Clair County), Madison is to the north. The County is 725 square miles, making it among the ten largest counties in the state.

Located near the confluence of the country's great rivers, it was here at Camp River Dubois (now the Lewis and Clark State Historic Site in Hartford, IL) that Captain Merriwether Lewis and William Clark set out on their expedition to explore the West. On the southern edge of Madison County sits Cahokia Mounds, a settlement that was in its height in 1250 A.D. the largest urban center in North America north of Mexico, and is now a UNESCO World Heritage Site. The County is home to Illinois' second largest natural lake (after Lake Michigan), Horseshoe Lake, also located in the southern part of the

county. The lake is in a low flood plain and is home to Horseshoe Lake State Park, which boasts 2960 acres of natural beauty and recreational opportunities. A thriving port located on the southwestern edge moves more than 3 million tons of products annually.¹² The eastern part of the state is largely rural, containing many agricultural areas.

The largest industries are trade / transportation / utilities, which employs 21.3% of the population; followed by education and health (21.9%); and then by manufacturing (16.1%). The County's largest employers are Southern Illinois University, located in Edwardsville; U.S. Steel located in Granite City; Olin Brass in East Alton; and Conoco Philips Wood River Refining Co. in Wood River.¹³

Madison County borders Bond (east), Clinton (southeast), Jersey (northwest), Macoupin (north), Montgomery (northeast), St. Clair (south), as well as the Missouri counties of St. Charles (northwest), St. Louis City (west) and St. Louis County (west).

Madison County is divided into 24 townships, 10 of which are rural (Foster, Moro, Omphghent, Olive, New Douglas, Hamel, Alhambra, Leef, Marine and St. Jacob) and which are clustered in the northern and eastern parts of the county. Eight townships are suburban and are located in the central areas of the county (Fort Russell, Edwardsville, Pin Oak, Collinsville and Jarvis) as well as one in the extreme northwest (Godfrey) and two in the southeast corner (Saline and Helvetia). Finally, six townships are urban and are clustered in the western end of the county (Alton, Wood River, Chouteau, Venice, Granite City and Nameoki).

B. Demographic Profile

1. Population Change

The total population of Madison County, taken in the 2006 – 2008 American Communities Survey, was 267,038. The 2009 population estimate was 268,457, showing an overall 3.7% growth from the 2000 census.

The largest population centers are Granite City (31,301), Alton (30,496), Collinsville (24,707), Edwardsville (21,491) and Godfrey (16,286). Of these, Godfrey was the most recent to incorporate, having become its own municipality in 1991. For this reason, the growth rate from 1990 to 2000 cannot be compared. However, the village grew from 16,286 to an estimated 17,415 between 2000 and 2007, a growth rate of almost 7%.

Some areas have experienced tremendous population growth measured by the change in population between the 1990 and 2000 census. These changes have taken place primarily in the central part of the county.

Table 1: Population Growth Areas

Name	2000 Population	1990 Population	% Change
Maryville	4651	2576	80.55
Edwardsville	21491	14579	47.41
Troy	8524	6046	40.99
Pontoon Beach	5620	4013	40.04
Glen Carbon	10425	7731	34.85
Pierron	653	554	17.87
Fairmont City*	2436	2140	13.83
Highland	8438	7525	12.13
Collinsville	24707	22446	10.07
Hamel	570	530	7.55
St. Jacob	801	752	6.52

*Fairmont City is only partially contained in Madison County.

Others have experienced dramatic declines, especially those areas in the western part of the county.

Table 2: Areas of Declining Population

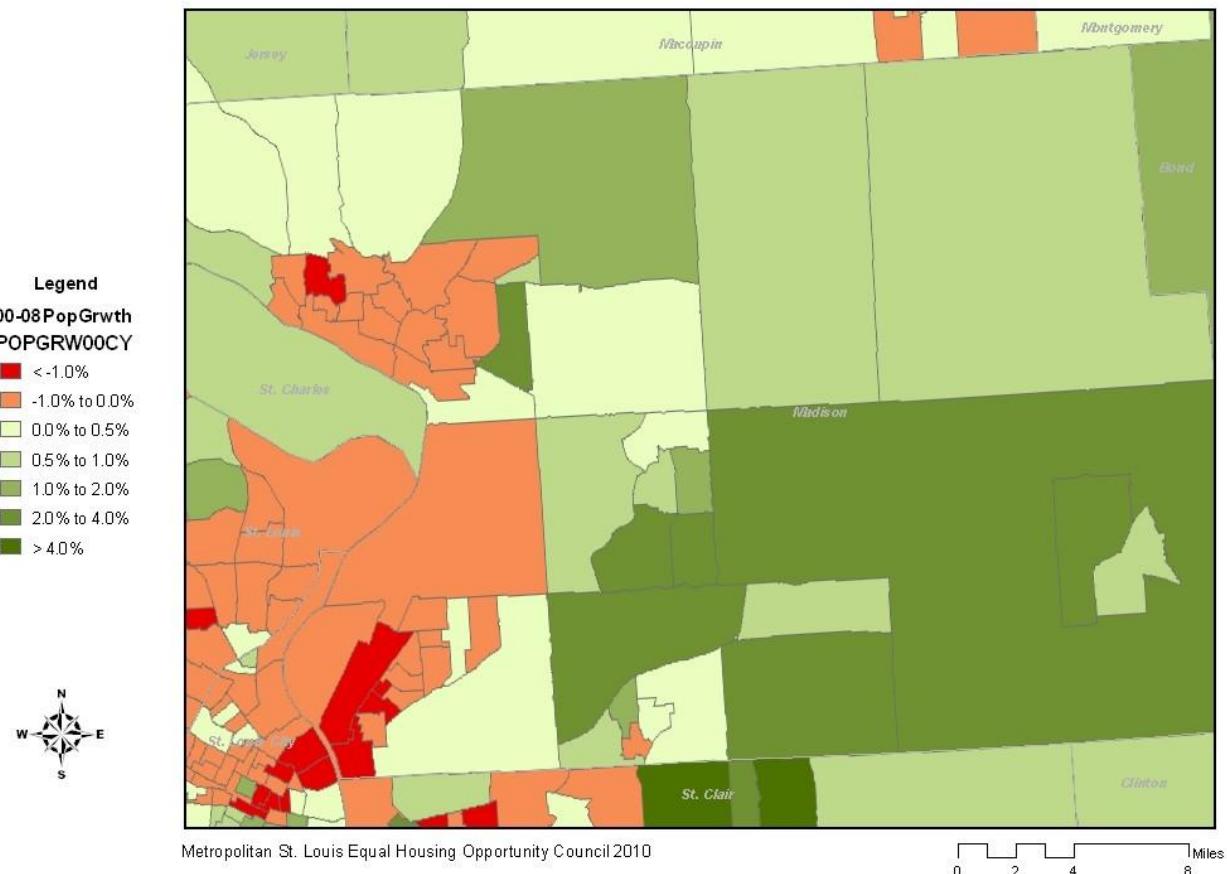
Name	2000 Population	1990 Population	% Change
Venice	2528	3571	-29.21
Rosewood Hei	4262	4821	-11.6
Alhambra	630	709	-11.14
Livingston	825	928	-11.1
Williamson	251	278	-9.71
Hartford	1545	1676	-7.82
Alton	30496	32905	-7.32
Grantfork	254	273	-6.96
Marine	910	972	-6.38

A third group of areas have remained more or less static:

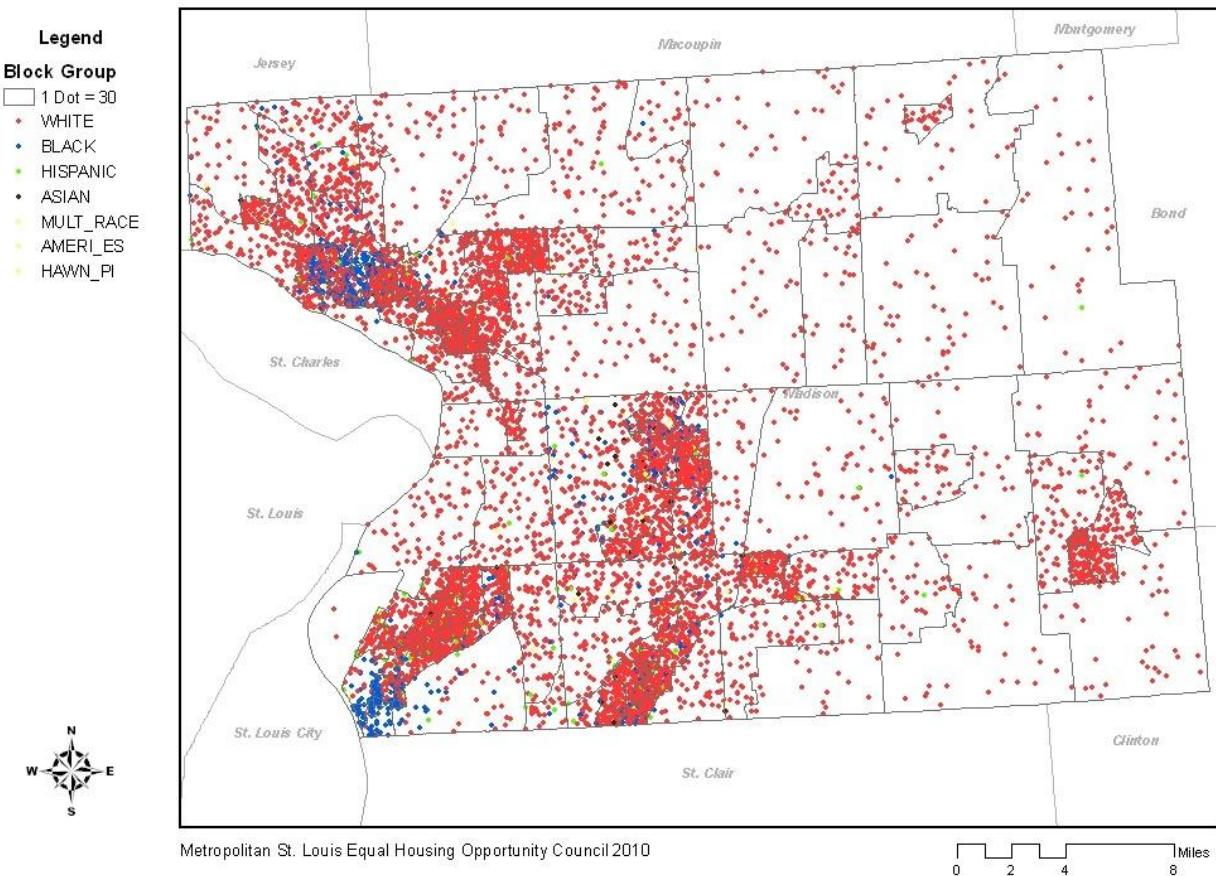
Table 3: Areas of Stable Population

Name	2000 Population	1990 Population	% Change
Worden	905	896	1
Bethalto	9454	9507	-0.56
Roxana	1547	1562	-0.96
Wood River	11296	11490	-1.69
Madison	4545	4629	-1.81
East Alton	6830	7063	-3.3
South Roxana	1888	1961	-3.72
New Douglas	369	387	-4.65
Granite City	31301	32862	-4.75

Population Change 2000 - 2008 in Madison County



Population by Race in Madison County

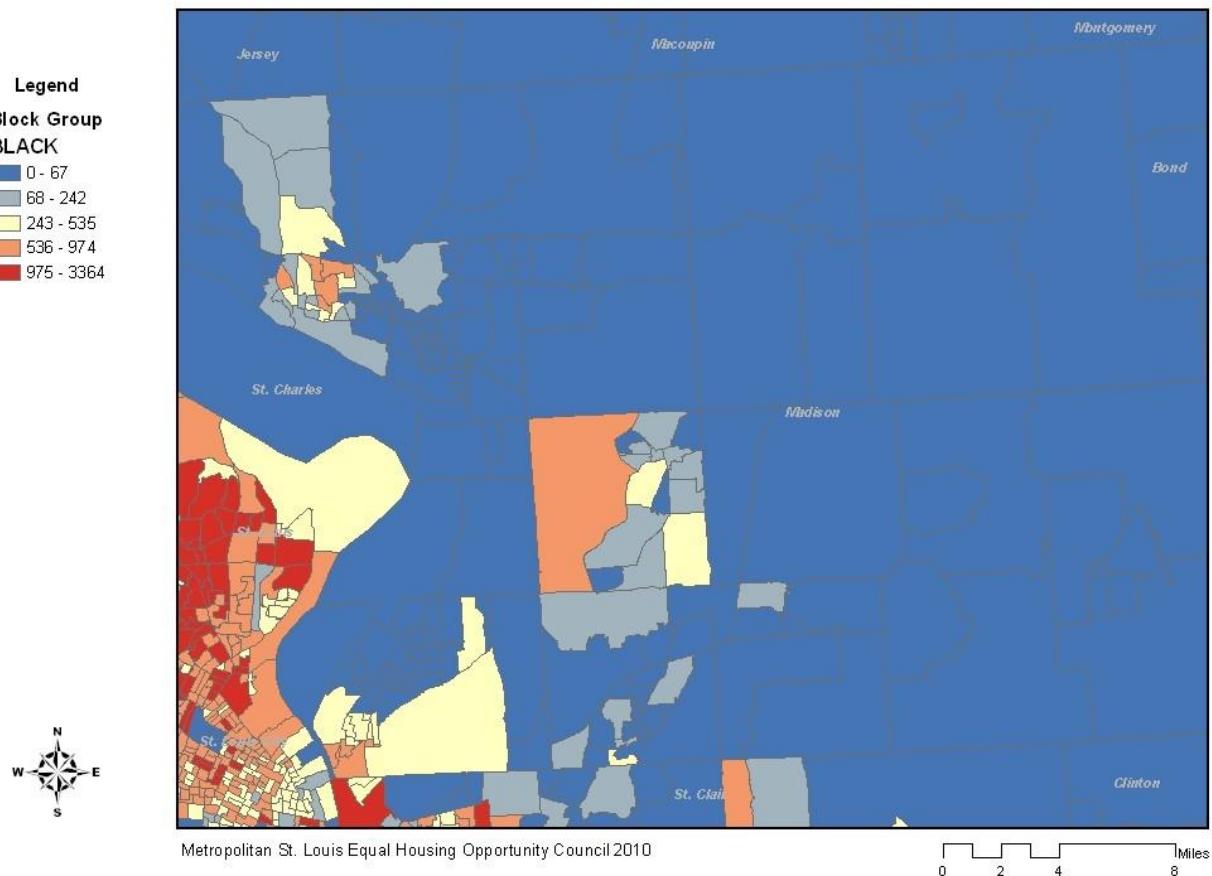


2. Race

Whites by far outnumber other racial groups in Madison County, composing 89.6% of the population. Blacks compose 8.1% of the population, followed by 1.2% multiracial, 0.7% Asians and 0.3% American Indian and Alaska Native. Blacks constitute the largest racial minority, and the group that is most likely to file a fair housing complaint in Madison County.¹⁴

There is a high level of racial segregation in Madison County that primarily affects Whites and Blacks, who are more likely to be racially isolated than Asians or Hispanics. African Americans are concentrated in the western parts of the county, in Venice, Alton, and Madison, while Whites are concentrated in Highland, Troy, Edwardsville, Glen Carbon and Maryville and the rural parts of the county. Venice is the only predominately Black municipality in the county. However, there are many areas of the county that are nearly all White, the largest of which is Highland. There are eight places that have no Blacks, including Alhambra, Grantfork, Hamel, Livingston, New Douglas, St. Jacob, Williamson and Worden.

African Americans in Madison County



The two places which have the largest percentage of Asians are Edwardsville and Glen Carbon. Significantly, though the overall percentage of Asians in Madison County is 0.7% in contrast to 8.1% Black, there are only five places that have no Asians: Alhambra, Grantfork, Hamel, Williamson and Worden. And though the population of American Indian / Alaska Native is a mere 0.3% in Madison County, there are only three places that have no American Indians / Alaska Natives: Alhambra, Hamel and Livingston. There are biracial / multiracial populations in every place, except for Williamson, but, significantly, *none* of the multiracial Black / White persons live in Alhambra, Grantfork, Hamel, Livingston, New Douglas, St. Jacob, Williamson or Worden.

When we examine areas that have two or fewer Black households, the statistics are even more striking: there are 15 communities with a combined population of 23,848. These communities also tend to have fewer Asian, American Indian / Alaska Native or Hispanic households as well, but none are excluded to the extent that Black families are.

Table 4: Exclusionary Communities

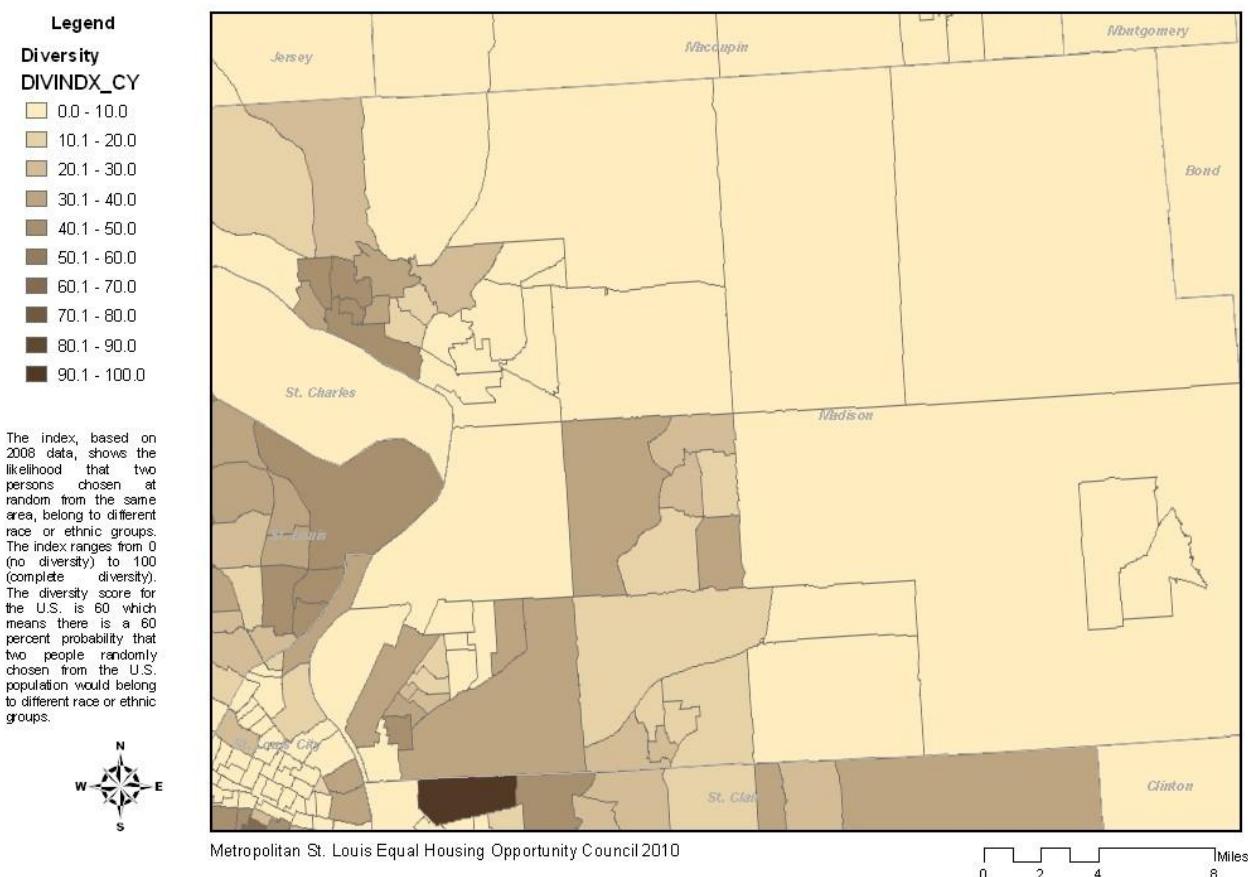
Name	Households with Black Householder	Households with Amer Ind / Alaska Nat Householder	Households with Asian Householder	Households with Hispanic Householder	Total Population
Alhambra	0	0	0	0	630
Grantfork	0	1	0	0	254
Hamel	0	0	0	1	570
Hartford	1	1	0	2	1545
Highland	2	5	14	34	8438
Livingston	0	0	0	0	825
Marine	1	2	0	3	910
New Douglas	0	1	1	5	369
Pierron	0	1	0	1	653
Rosewood Hts CDP	1	2	2	12	4262
Roxana	0	2	0	4	1547
St. Jacob	0	1	0	3	801
South Roxana	1	5	1	3	1888
Williamson	0	1	0	0	251
Worden	0	2	0	3	905
(Total)	6	24	18	71	23848

The St. Louis metropolitan area has been called "hypersegregated" because Blacks are segregated from other racial groups using all five segregation indices examined.¹⁵ According to John Farley, professor emeritus at Southern Illinois University Edwardsville, Madison County has one of the lowest indices of segregation in the highly segregated St. Louis metropolitan area. Nevertheless, Madison County's dissimilarity index (the percentage of people in one group that would have to move in order to match the spatial patterns of the other group) of 64.6 is "far closer to the segregated end of the scale than the integrated end."¹⁶ The dissimilarity index for Madison County's adult population is a bit lower (63.8); its index for children under 18 years (67.3), higher. This is the case (and not only in Madison County), Dr. Farley says, because "apparently...there are some neighborhoods in which black families are mixed with white elderly and childless adults. Thus while the neighborhoods may be integrated overall, the children in the neighborhood are not."¹⁷

In his 1993 study, Dr. Farley included a list of Madison County cities and towns and their expected and actual percentage of blacks. The expected percentage is based on indirect standardization of housing costs and tenure. His results indicate that housing costs are unimportant as a cause of black-white segregation. More important causes are steering by real estate agents, white preference for all white or nearly all white neighborhoods, and black preference for mixed neighborhoods. According to Farley, these racial factors are more important than socioeconomic factors in residential segregation.

The map below shows the lack of diversity existent in most parts of the county, with discernible levels of diversity in the areas of Edwardsville, Alton, and Madison.

Diversity Index for Madison County



3. Ethnicity & Immigrant Populations

An estimated 2.2% of the population identifies as Hispanic or Latino origin (2009 estimates), while 1.7% of the population speaks Spanish at home (ACS 2006-08). Just over 1% (1.3%, 2009 estimates) of the population is foreign born. The only significant concentration of Hispanics in the St. Louis MSA is in Fairmont City, an area that straddles the border between Madison and St. Clair Counties, with the majority of the population living in St. Clair County. The population of Fairmont City is 55.4% Hispanic, and the village has a total population of 2436. There are only two communities in Madison County in which there are no Hispanics: Alhambra and Williamson. Otherwise, Hispanics are spaced quite evenly among the Madison County population, with Hispanics constituting generally about 0.5% to 2% of the population in every community, with slightly higher populations in New Douglas (2.98%), Granite City (2.86%) and Collinsville (2.16%).

While it is clear that ethnicity and national origin are not synonymous, it is also clear that most Hispanics in Madison County would be protected under the Fair Housing Act based on “national

origin,” even those born in the United States, as HUD has indicated that the national origin protection extends to immigrants and people who are the children of immigrants.

4. Persons with Disabilities

Approximately 10% of the adult population in Madison County (ages 21 to 64) has a disability. The areas with the highest percentage of adults with disabilities include Venice (18.75% disabled), Fairmont City (though it's likely that most of these people live in St. Clair County), Livingston (16.7% disabled), and Hartford (15.93% disabled).

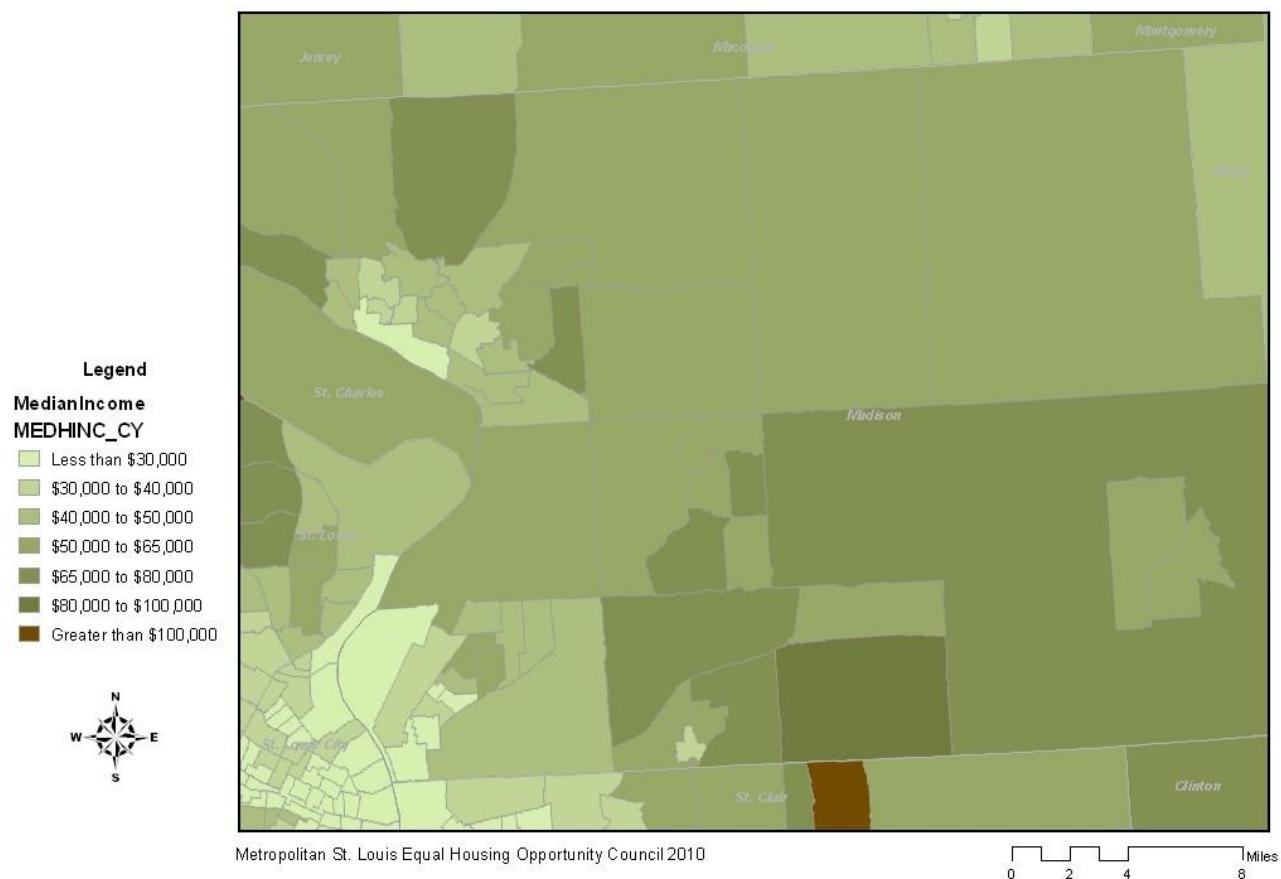
Those with employment disabilities are in the largest group of disabled, followed by those with physical disabilities, sensory disabilities, go-outside-home disabilities, and mental disabilities. Many people have more than one disability.

There are a number of organizations serving persons with disabilities in Madison County. IMPACT is a center for independent living located in Alton that serves a six county area. IMPACT is a self-help advocacy organization formed primarily by people with disabilities. Programs include peer counseling, information and referral, self advocacy and independent living skills.¹⁸ There is a Madison County chapter of the National Alliance on Mental Illness, located in Granite City. This organization also provides support, advocacy, research and education for persons with mental illnesses and their families.¹⁹ Chestnut Health Systems is a large mental health agency that provides a full range of mental health and chemical dependency services. Chestnut maintains three Madison County offices.²⁰ Community Counseling Center of Northern Madison County provides psychosocial rehabilitation and other mental health services in the Alton area. Other agencies serving persons with disabilities in Madison County include Cerebral Palsy of Southwestern Illinois, Illinois Center for Autism, Epilepsy Foundation of Southwestern Illinois, Call for Help Inc., William DeBell Center Achievement and Resource Center, New Opportunities, Inc. and more.²¹

5. Income

Median income for the county in 2008 was \$51,207, with 12.6% of the population living below the poverty line, slightly higher than the average poverty level statewide (12.2%). Areas of high poverty concentration coincide with areas of high concentration of Blacks. However, Edwardsville, which is one of the most diverse areas of the county, is also one of the more affluent areas. Edwardsville is the county seat and the location of the largest employer, Southern Illinois University.

Median Income 2008 for Madison County



6. Issues of Age: Seniors and Families with Children

Venice and Troy have the largest populations of children under the age of 18, with over 30% of their population constituting children. By contrast, Alhambra has the smallest percentage of children, with 82.8% of its population over the age of 18.

Seniors disproportionately have one or more disabilities, and this trend increases the older one gets. The communities with the largest populations of seniors 65+ are Granite City (1728), Alton (1471), Collinsville (1231) and Godfrey (1099). Rosewood Heights CPD (11.91%) and Godfrey (10.66%) have over 10% of their population in the 65 – 74 age bracket.

7. Female Headed Households

On average, female headed households with children constitute 2.53% of all families in Madison County. Venice has a significantly higher percentage of female headed households with children,

constituting 10.14% of all families. Higher levels also exist in Madison (5.1% of all families) and Alton (4.3%).

8. Other Protected Bases

The Association of Religion Data Archives estimates that there are 150,919 religious adherents in Madison County, approximately 58.3% of the county's population; however, historically African American denominations are not included in the total. The largest denomination, by far, is the Catholic Church. Protestant denominations make up the bulk of the rest of the adherents, though there are small populations of Orthodox Christians. The estimated number of Muslims is 2,626, and the estimated number of Jews is 200, and there are 141 Bahai. There are low or no estimates for Universalists, atheists, Hindus, Sikhs, Buddhists, and others.²² There is one synagogue, Temple Israel, located in Alton. The Islamic Center of Edwardsville is located in Glen Carbon. There are student organizations at Southern Illinois University Edwardsville representing minority faith groups including the Muslim Students Association and Hillel. Those in minority religious faiths were contacted for this study. Only one responded, a representative from Hillel at SIU-Edwardsville. The representative indicated that although he could not speak authoritatively on this subject, he was not aware that housing discrimination or other types of discrimination were an issue presently for the Jewish community in Madison County.

On average, 5.6% of households in Madison County are composed of unmarried partners. Same sex partners constitute about 0.5% of all households. The highest percentage of unmarried partner couples lives in Pontoon Beach (8.3%), Williamson and Madison (8.1% each) and South Roxana (7.64%).

C. Housing and Land Use

1. Housing Units and Status

There were 117,861 housing units in 2008. The homeownership rate in 2000 was 73.8%, significantly higher than the statewide average of 67.3%, but likely an unreliable figure since the Great Recession began in 2008. The median value of owner-occupied housing was \$77,200 in 2000, giving residents of Madison County a much more affordable entry into the home buying market than the statewide average of \$130,800. The average vacancy rate countywide was 7.22%. Highest vacancy rates were recorded in Madison (18.99%), Venice (17.68%) and New Douglas (17.42%).

Table 5: Madison County Vacancy Rates

Place	Housing units: Total	Housing units: Vacant	Vacancy Rate
Alhambra	216	7	3.24
Alton city	13894	1376	9.9
Bethalto	4007	197	4.92
Collinsville city	11025	567	5.14
East Alton	3171	206	6.5
Edwardsville city	8331	356	4.27
Fairmont City	939	68	7.24
Glen Carbon	4236	225	5.31
Godfrey	6694	267	3.99
Granite City city	14022	1249	8.91
Grantfork	103	2	1.94
Hamel	242	9	3.72
Hartford	710	60	8.45
Highland city	3610	168	4.65
Livingston	396	29	7.32
Madison city	2322	441	18.99
Marine	380	17	4.47
Maryville	1816	73	4.02
New Douglas	178	31	17.42
Pierron	268	17	6.34
Pontoon Beach	2341	207	8.84
Rosewood Heights CDP	1754	66	3.76
Roxana	697	42	6.03
St. Jacob	321	20	6.23
South Roxana	809	102	12.61
Troy city	3201	101	3.16
Venice city	1154	204	17.68
Williamson	112	13	11.61
Wood River city	5001	276	5.52

The average median rent asked, based on the 2000 Census, for Madison County was \$363. The area with the highest median rent asked was Edwardsville, at \$584, Godfrey not far behind at \$575. The areas with the lowest median rent asked were Venice (\$225) and Pierron (\$230). With a large university pushing up rental rates, Edwardsville clearly had an exceptional housing market. Affordable housing appeared to be dispersed throughout the county, with rents at \$300 or below in Fairmont City (\$250), Granite City (\$299), Livingston (\$250), Maryville (\$288), New Douglas (\$300), Pierron, Rosewood Heights (\$275) and Venice.

2. New Construction

In the past five years (2005 – 2009), there have been 4655 new units of housing constructed. Of that, 3987 units have been single family; 217 units have been 2 – 4 family; and 451 have been multifamily with 5+ units.²³ An attempt to locate multifamily housing built in the past five years in Madison County

that is subject to the Fair Housing Act design and construction requirements turned up only subsidized / public housing or institutional facilities such as assisted living facilities or nursing homes. Some of the new housing constructed appears to be multistory townhomes that are not subject to the Fair Housing Act design and construction requirements. This includes many of the units at Meachum Crossing and at Granite City Housing Authority's new development. Both developments have some single story units attached to other townhomes, though the majority of units at both developments appear to be multistory townhomes.

Multifamily housing in the past five years has been constructed in Alton (140 units), Collinsville (25 units), Edwardsville (56 units), Glen Carbon (82 units), Granite City (8 units), Highland (132 units), and Maryville (8 units). Unincorporated areas of Madison County, as well as the municipalities of Bethalto, Godfrey and Troy were notable for the large number of single family units built without a single two-four family or multifamily unit constructed. In unincorporated Madison County, 1040 new units were constructed; in Bethalto 206 were built; in Troy, permits were issued for 285 single family units; and in Godfrey, 304 new units were constructed.

3. Zoning Barriers to Multifamily Housing

An attached map of land use in Godfrey indicates that there are only two parcels in the village boundaries that are available for construction of multifamily housing. An attached 2010 Zoning Map of Bethalto appears to indicate that there are no sites for new multifamily housing construction, though there appear to be few sites for any future housing construction.

4. Group Quarters

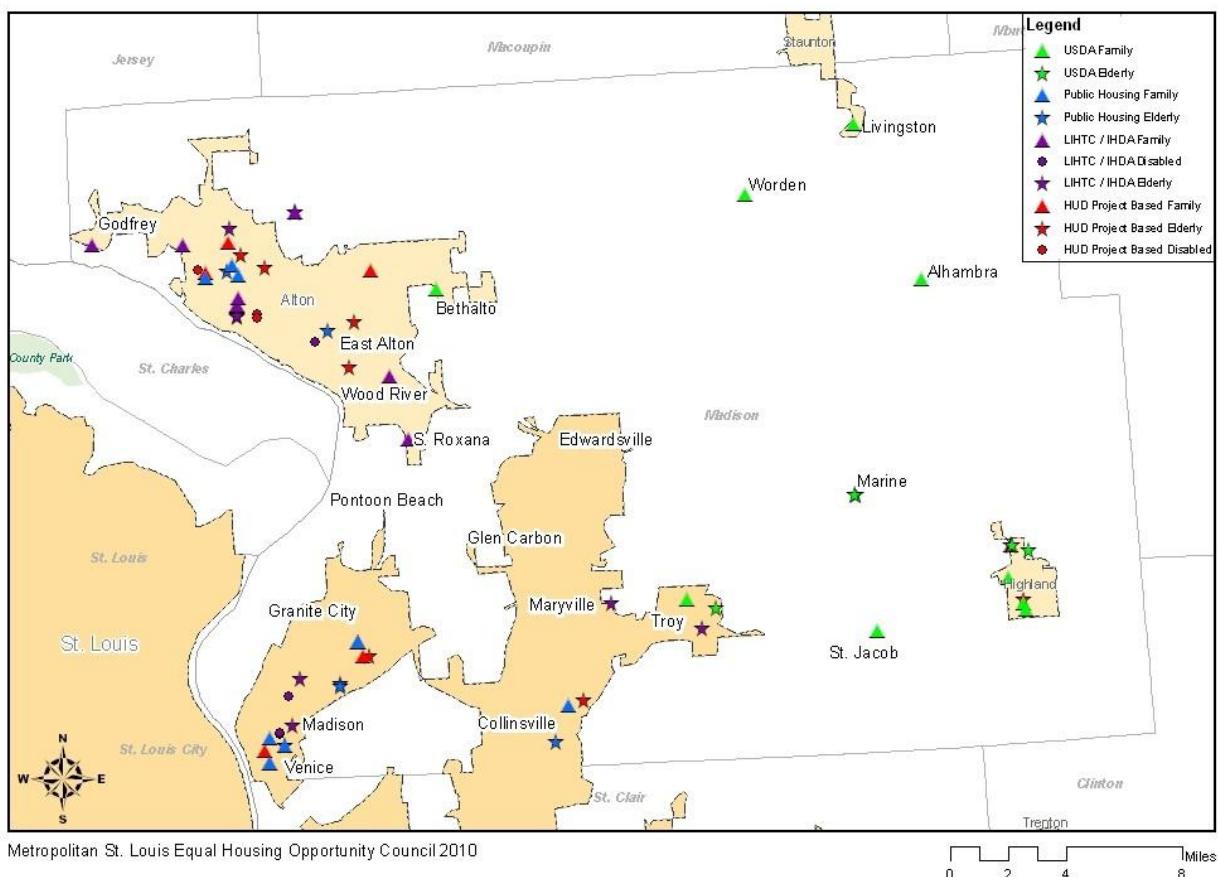
At the 2000 Census, 4796 individuals in Madison County were in group quarters, including dormitories, correctional institutions, nursing homes, group homes and other group quarters. Most of those were in nursing homes (2234).

In June 2008, residents from Steinmeyer subdivisions sued the city of Edwardsville for approving zoning for student housing.²⁴ The lawsuit was dismissed, but as of the completion of this study, the housing had not been built.

5. Subsidized Housing

There are three public housing authorities in Madison County: Madison County Housing Authority, Alton Housing Authority and Granite City Housing Authority. In addition, there are Project Based HUD-subsidized projects and projects subsidized by the U.S. Department of Agriculture (USDA) as well as Low-Income Housing Tax Credit (LIHTC) and Illinois Housing Development Authority (IHDA) supported projects.

Low Income Housing in Madison County



As part of this AI review, public housing authorities and all subsidized housing providers (including Project based Section 8 and USDA Multifamily) were contacted for information regarding the number and type / size of units they manage, number of accessible or adaptable units, the year the housing was built, information about applicants and tenants along with their protected class status, length of waiting list and any affirmative marketing plans.

Public housing has seen dramatic changes over the past six years in Madison County. Over 850 units of public housing have been demolished, with another 150 units slated for demolition (Kirkpatrick Homes). Additional units have been created, though far fewer units of public housing are available than previously. New housing that has been built in Granite City (Granite City Commons and Oak Tree Villas), Venice (Meachum Crossing), Madison (Washington Avenue Apartments) and Alton (Alton Pointe) all feature townhouse style apartments with a lower density, some of which offer mixed income housing opportunities. The Madison County Housing Authority, for example, has invested \$16 million in the Meachum Crossing project.²⁵ All public housing is concentrated in the western part of the county, with housing in Collinsville the furthest east of any public housing, and Olin Homes in East Alton, the

furthest north. All other public housing units are in Alton, Granite City, Madison, or Venice.

Table 6: Public Housing Units in Madison County

Name	PHA	Address	City	Total Units	Year Built
Alton Acres	AHA	3116 Acorn Street	Alton	100	1960
Alton Manor	AHA	266 Janet	Alton	48	1962
Oakwood Estates	AHA	849 Oakwood Ave	Alton	100	1970
Northgate Homes	MCHA	80 Burlington Street	Collinsville	100	1953
Olin Homes	MCHA	310 Smith Ave.	East Alton	59	1963
Braner Homes	MCHA	150 South Aurora	Collinsville	74	1966
Garesche Homes	MCHA	83 Garesche Homes	Madison	78	1953
Viola Jones Homes	MCHA	Meredocia and Calhoun	Madison	37	1943
Kirkpatrick Homes	GCHA	101 Kirkpatrick Homes	Granite City	72	1941
Anchorage Homes	GCHA	2901 East 25 th Street	Granite City	100	1962
Anchorage	GCHA	2401 Anchorage	Granite City	100	2002
Washington Avenue	MCHA	1530 Market Street	Madison	7	2004
Meachum Crossing	MCHA	928 Bob Collins St	Venice	5	2009
Granite City Commons	GCHA	2688 David Morgan Dr.	Granite City	48	2009
Oak Tree Villas	GCHA	2941 Costello Lane	Granite City	48	2006
Alton Pointe	MCHA	Riley Ave at Della Ave	Alton	84*	2008
Total Public Housing Units				1100	

*Not all units in this mixed income development may be public housing.

The Madison County Housing Authority also has project-based vouchers including 16 vouchers in use at Alton Pointe (in addition to their 21 public housing units), and 16 project-based vouchers at Meachum Crossing (in addition to the 5 public housing units). All of the mixed finance developments also accept Section 8 vouchers. Regulations in effect at the time that Washington Avenue Apartments and Hampton Place Homes were developed prevented the use of project based vouchers. The Madison County Housing Authority applied for project based vouchers at Washington Avenue Apartments and at scattered single family rental homes in Alton, but was turned down by HUD due to the concentration of minorities and concentration of poverty.²⁶

The data received from the Madison County Housing Authority show that there is a high level of segregation in many of the housing authority's developments. Four of the developments are greater than 97% Black: Meachum Crossing (100%), Washington Avenue (100%), Garesche (97.4%) and Viola Jones (97.1%). This was the case even though the applicant pool is significantly more diverse: Meachum Crossing (8.8% of applications from Whites), Washington Avenue (15.2% from Whites), Garesche (12.4% from Whites), and Viola Jones (7.4% from Whites). On the flip side, Olin, located in East Alton, was 95% White, even though 36% of applications came from Blacks. The two

developments in Collinsville, Northgate and Braner, have widely divergent demographics: Braner is 77% White / 23% Black, while Northgate is 10% White / 87% Black. The applicant pool for both complexes was much more evenly distributed: with 58% White / 52% Black applicants for Braner, and 29% White / 69% Black applicants for Northgate.

These statistics are troubling, because they show a high level of racial segregation in Madison County's public housing developments which are required to "affirmatively further fair housing." In explanation, the Housing Authority states that MCHA prioritizes former residents of demolished public housing developments which affects the racial makeup of the initial group receiving leases.²⁷ The director of the Housing Authority also indicated that after taking their preferences into account for former residents of demolished housing, that they process applications in the order they are received as they are required to do.²⁸

In all of the MCHA developments, there are only five Hispanics. This is far fewer than one would expect, since about 2% of those living in poverty in Madison County are Hispanic. This raises questions on whether persons with limited English proficiency are receiving the translation and interpretation assistance that housing authorities are required to provide, and whether affirmative marketing plans have been tailored enough to reach the Hispanic population.

An analysis of applicants from persons with disabilities compared to actual residents shows that in almost all cases, people with disabilities are represented in significantly higher percentages among tenants than in the resident pool. At Meachum Crossing and Northgate there slightly lower percentages of persons with disabilities represented among residents as among applicants. The housing authority may be operating under a federally approved preference for persons with disabilities, allowable under fair housing guidelines.

Granite City Housing Authority's family developments show a much higher degree of racial integration between Whites and Blacks than do Madison County Housing Authority's. Of the 59 residents of Kirkpatrick Homes, 47% are White and 53% are Black. At Granite City Commons, 62.5% are White and 37.5% are Black. In addition, 8.3% of residents are Hispanic. The elderly developments are much less diverse: all 48 residents of Oak Tree Villas are White. Only 2.6% of residents at Anchorage Homes are Black, and all others are White. There is one Hispanic at Anchorage Homes. The Granite City Housing Authority has a very short waiting list. There are only two people on the waiting list: one White and one Black.

Persons with disabilities are represented in each development: Kirkpatrick Homes (15% disabled); Anchorage Homes (19% disabled); Oak Tree Village (6% disabled); and Granite City Commons (15% disabled).

Five public housing developments were built after March 13, 1991, and thus are subject to the Fair Housing Act design and construction requirements. One of these, Anchorage Homes, was the subject of a lawsuit in federal court (EHOC v. Granite City Housing Authority) for failure to comply with the fair housing accessibility requirements. A settlement was reached in this lawsuit, requiring the housing authority to retrofit units so that they are FHA-compliant. The other new construction (Meachum Crossing, Washington Avenue, Granite City Commons and Alton Pointe) all have multistory

townhomes which are not covered by the design and construction requirements. They also have some single story units which function as the Section-504 compliant fully accessible units. This limits the number of units that are adaptable for persons with disabilities.

The Alton Housing Authority indicated that they have a total of 626 occupants in public housing, and there are 99 disabled families. Of the 626 occupants, 37 are white and 589 are black. The Alton Housin Authority did not provide a further breakdown for each development.

There are other types of HUD-subsidized housing units in Madison County. HUD's website lists 20 HUD-subsidized housing providers in Madison County.²⁹ These are private companies that manage low-income housing under contract with HUD. Together, they manage a total of 1393 units of subsidized housing. Here again, many of the units are concentrated in the western part of the county, with seven developments in Alton, two developments in Granite City, two in Wood River and one each in Cottage Hills, East Alton, Godfrey, and Collinsville. The notable exceptions are that there are also two developments located in Highland, IL, in the eastern part of the county, and one in Edwardsville, in the central part of the county. Interestingly, the development in Highland (Northtown East Apartments) is 100% White in the racial makeup of its residents.

All HUD-subsidized housing providers were contacted using the contact information on HUD's website, and a request for information was made regarding the number and type / size of units they manage, number of accessible or adaptable units, the year the housing was built, information about applicants and tenants along with their protected class status, length of waiting list and any affirmative marketing plans. Only one housing provider sent information as requested in time for this report.

Table 7: HUD Subsidized Housing

Property Name	Address 1	City	Assisted Units	Total Units
Stevens Building	118 HALLER ST	WOOD RIVER	46	46
May Building	1701 BRYANT	EDWARDSVILLE	46	46
Hillcrest Apartments	1710 MUNY VISTA DR	ALTON	100	101
Storey Manor	40B Manor Drive	COTTAGE HILLS	50	50
Golden Oaks Apartment	111 W Acton	WOOD RIVER	40	40
Bissell Apartments	1300 KLEIN AVE	VENICE	92	92
Belle Manor	3200-02 Belle ST	ALTON	60	60
Skyline Towers	3113 Washington Ave.	ALTON	158	158
Woodland Towers	306 PINE LAKE RD	COLLINSVILLE	104	104
Township Village Apts.	617 Valley DR	EAST ALTON	122	122
Town and Country Apts.	2562 PARKVIEW DR	GRANITE CITY	121	121
Northwood Apts.	323 BIG ARCH RD	GODFREY	40	100
New Parkside Apts.	2510 PARKVIEW DR	GRANITE CITY	63	64
Alton CMI Apartments	727 Washington Avenue	ALTON	16	16
Warren Hempel Apts.	121 Manor Court	ALTON	18	18
Yakubian Homes	2302 S. State Street	ALTON	20	20
Northtown East Apts.	85-A SUPPIGER LN	HIGHLAND	24	24
Marian Heights Apts.	20 Marion Heights Drive	ALTON	127	127
Faith Countryside Homes	1331 26th Street	Highland	56	84
Total			1303	1393

While public and HUD-subsidized housing is concentrated in the western part of the county, multifamily housing subsidized by the US Department of Agriculture (USDA) is located primarily in the eastern part of the county, in Highland, Troy, Alhambra, Livingston, St. Jacob, Worden, and Marine. Bethalto and Moro in the central part of the county also have USDA housing.

As part of this study, information was requested from USDA multifamily housing providers, including the number and type / size of units they manage, number of accessible or adaptable units, the year the housing was built, information about applicants and tenants along with their protected class status, length of waiting list and any affirmative marketing plans. Only one housing provider sent the requested information in time for this report; however, this housing provider manages nine USDA complexes and one HUD-subsidized complex, making it the largest USDA-supported housing provider in the county.

Data show that USDA housing in Madison County is, compared to other types of subsidized housing, even more racially segregated. The only development for which data was submitted that had any substantial population of other races besides Whites was for Silvercreek Apartments in Troy, IL, which is 88% White.

Table 8: USDA Supported Multifamily Housing in Madison County

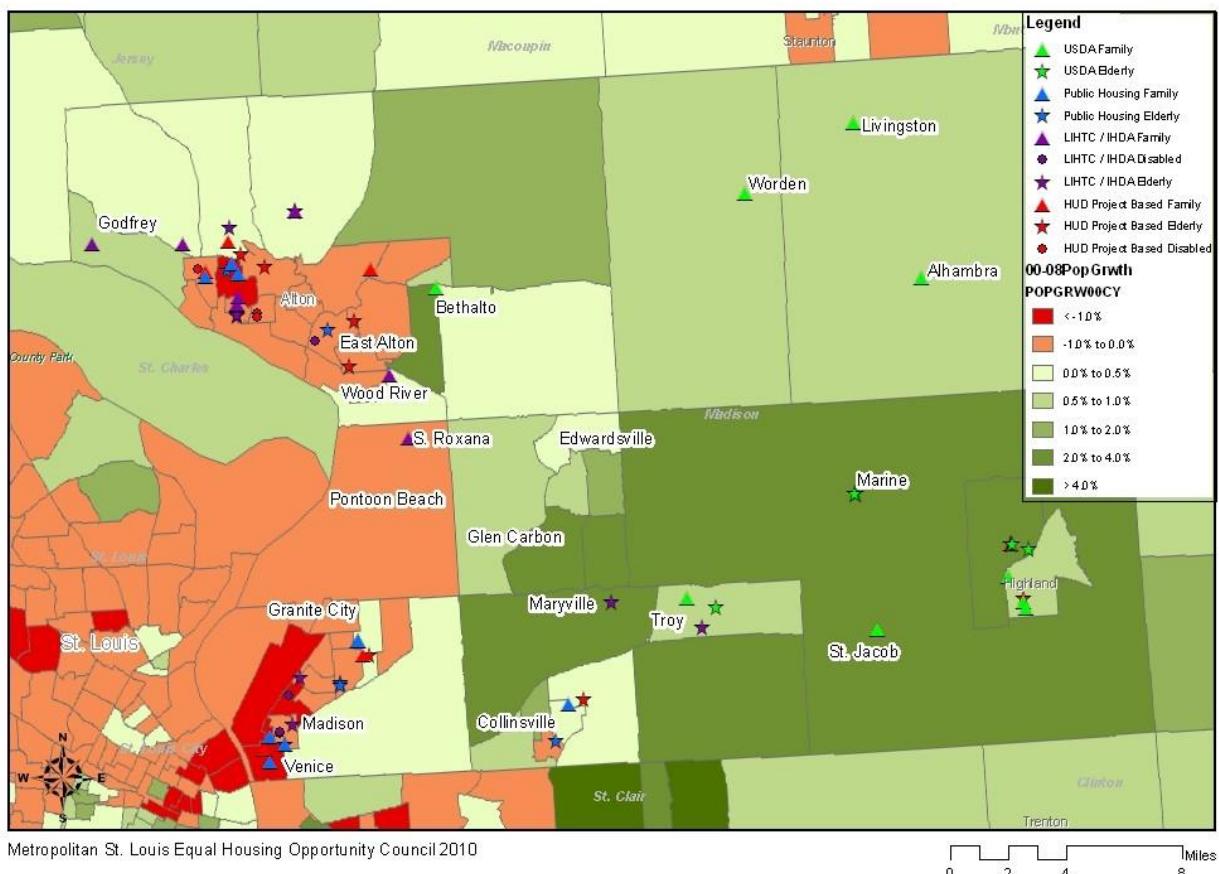
Project Name	Location	City	Complex Type	Total Units	% White	% Black
Arrowhead Apts	717 E. MAIN ST	Alhambra	FAMILY	8	N/A	N/A
Daffodil Apts	1330 DAFFODIL LANE	Highland	FAMILY	24	100	0
Grade School Apts	488 SCHOOL ST	Livingston	FAMILY	16	N/A	N/A
Idlewood Apts	601 LOWER MARINE RD	Troy	ELDERLY	24	100	0
Main Street Apts	318 MAIN STREET	Livingston	FAMILY	6	N/A	N/A
Moro II Apts	1200 MORELAND CT	Moro	FAMILY	20	N/A	N/A
Plaza Garden Apts	200 SUPPIGER LANE	Highland	ELDERLY	17	89.47	5.26
Senior Plaza Apts	2676 EAGLE WAY	Highland	ELDERLY	19	95	0
Silvercreek Apts	402-424 MEADOW DR.	Troy	FAMILY	48	87.64	11.24
South Prairie Court	819 S. PRAIRIE ST	Bethalto	FAMILY	24	97.87	2.13
Southwest Apts	701-705 13TH STREET	Highland	FAMILY	16	100	0
Westglen Apts	215 JACOB STREET	St. Jacob	FAMILY	12	100	0
Town & Country Apts	1410 30TH STREET	Highland	FAMILY	24	97.96	2.04
Triton Housing	100 W MARION, 300 S DUNCAN, 301 S VERNON	Marine	ELDERLY	12	N/A	N/A
Worden Park Apts	344 SCHEIDER ST	Worden	FAMILY	16	N/A	N/A

Unfortunately, we do not have a breakdown of applications by race, so it is not possible to discern whether non-Whites were not applying, or whether they were not being accepted. However, we do have copies of the Affirmative Fair Housing Marketing Plans (AFHMP) for the developments above that have racial data. Both USDA and HUD require subsidized housing providers to analyze which protected classes would be least likely to apply without special outreach efforts. Housing providers are then required to identify specific marketing methods, including placing ads in area media sources and sending vacancy information to community contacts / organizations. The AFHMP is *not* designed to be one's marketing plan, it is only designed to show extra efforts to reach protected classes least likely to apply. Even so, housing providers identify local newspapers in predominately white communities (*Highland News Leader*, *Troy Times*, *Highland Shopper*) and area Chambers of Commerce (St. Jacob Chamber of Commerce), in addition to Madison County Community Development, as the primary means of reaching Blacks, Hispanics, Asians, persons with disabilities, and families with children. Not identified are newspapers that would reach a much higher proportion of minorities, such as the *Alton Telegraph*, *East St. Louis Monitor*, *Belleville News-Democrat*, or even the *Edwardsville Intelligencer*; community organizations that have specific outreach to these populations, such as IMPACT Center for Independent Living, Madison County Urban League or Latino Roundtable.

It is not only important to look at where low-income housing opportunities are located, but also where such opportunities are not present. The areas of the county that have experienced the most growth since 2000 have the fewest opportunities for low-income housing. There are *no* HUD-subsidized or public housing developments in areas of growth. Many of the USDA-supported developments are located in

areas of growth. The six municipalities with the highest growth rates (Maryville, Edwardsville, Troy, Pontoon Beach, Glen Carbon and Pierron) have four low-income housing developments between them, three of which are for the elderly. Two of these developments received support from the low-income housing tax credit program and / or from the Illinois Housing Development Authority, programs which generally offer less of a subsidy to residents than HUD-subsidized, USDA-supported or public housing, all of which require residents to pay only 30% of their income towards the rent.

Low Income Housing in Madison County and Population Growth 2000 - 08



D. Education

The county has 13 school districts. Currently, of the 13 districts, only one district has consistently made adequate yearly progress. This is Triad CUSD located in Troy, St. Jacob area. Edwardsville did not make “adequate yearly progress” for this year, but has in past years. Wood River / Hartford made adequate yearly progress but did not in the past.³⁰

A majority of the districts have been in school improvement plans for the past six years, including:

Alton, Collinsville, East Alton, East Alton – Wood River, Granite City, Highland, Madison, Roxana, Venice, and Wood River - Hartford. Venice School District currently only contains one school, Venice Elementary, which offers education for K – 8 grades.

According to David Rusk, “public elementary school enrollment data can be used not only to calculate annual school segregation indices but can serve as a reasonable proxy for residential segregation trends.”³¹ Data was analyzed for elementary schools throughout the county. These were schools that included third grade (preschools, K – 2 school, 4 – 5 grade schools were excluded), so that test scores could be evaluated. Of the 42 elementary schools in the county, three were predominately minority in 2009: Kreitner Elementary in the Collinsville School District that was predominately Hispanic (60.8% Hispanic); Harris Elementary School in Madison School District that was predominately African American (89.9% Black); and Venice Elementary that was predominately Black (95.1% African American). These three schools were also the only three with 90% or more of the student population low-income in 2009. All three failed to make “adequate yearly progress” in 2009 as measured by No Child Left Behind. Harris Elementary was three years into a school improvement plan and on “Academic Watch Status.” Kreitner was one year into a school improvement plan, on “Academic Early Warning Status,” and received commendation for 2009 Academic Improvement Award. Venice was nine years into a school improvement plan, and on “Academic Watch Status.”

The school districts that saw the greatest racial change in the past 10 years within their elementary schools include Collinsville School District and Granite City School District. In both cases, the percentage of minorities greatly increased. In Collinsville School District, the percentage of Whites decreased in every elementary school between 1999 and 2009, with dramatic decreases (more than 10% change in a 5-year period) at Kreitner Elementary, Summit Elementary and Webster Elementary. In the Granite City School District, there were dramatic decreases in White student enrollment as a percentage of the whole at four elementary schools, including Maryville, Niedringhaus, Prather and Wilson. In contrast, Bethalto, Edwardsville, East Alton, Edwardsville, Highland, Venice and Wood River had much more stable student populations in terms of race, with no more than a 5% change in White enrollment as a percentage of all students in a 5-year period, 1999 – 2009. Roxana and Triad had relatively stable enrollment by race, as well, with only slightly higher changes in one of their schools during the period 1999 – 2009.

Interestingly, the school district that saw the greatest gains in White population was the Alton School District. In four of its elementary schools there were increases in the White population in schools that had been close to an even split between Whites and nonwhites. In one school, there was a significant decline in the percentage of White students.

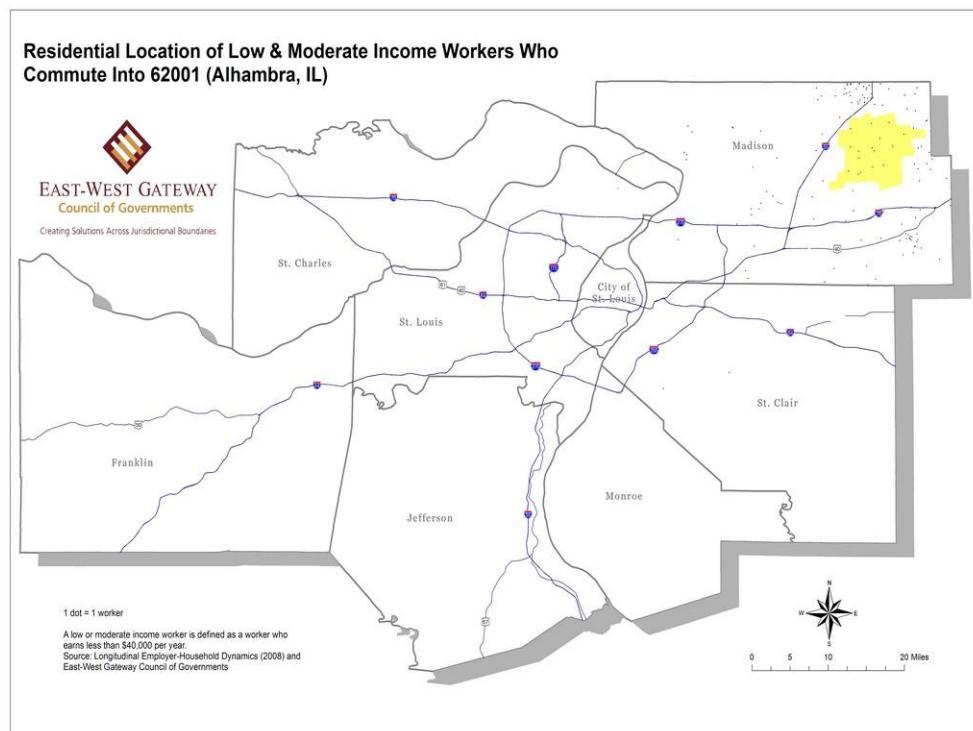
Six elementary schools have White enrollment that has consistently remained above 95%, and have no significant population of minorities. These include Highland Elementary School, with no Blacks and 1.5% Hispanics in 2009; New Douglas Mid Elementary, with no Blacks and no Hispanics in 2009; Central Elementary School in Roxana, that was 0.4% Black and 1.1% Hispanic; Marine Elementary School, with no Blacks and 1.4% Hispanics; St. Jacob Elementary School, with 0.5% Blacks and 1.4% Hispanics; and Hartford Elementary School, with student body that was also 0.5% Black and 1.4% Hispanic in 2009.

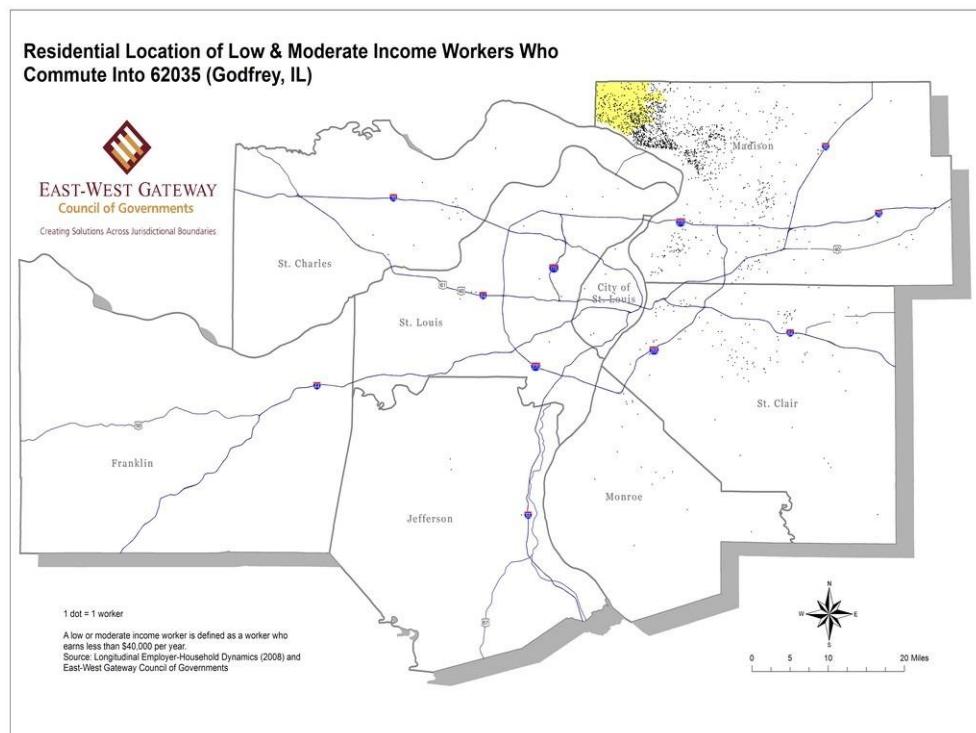
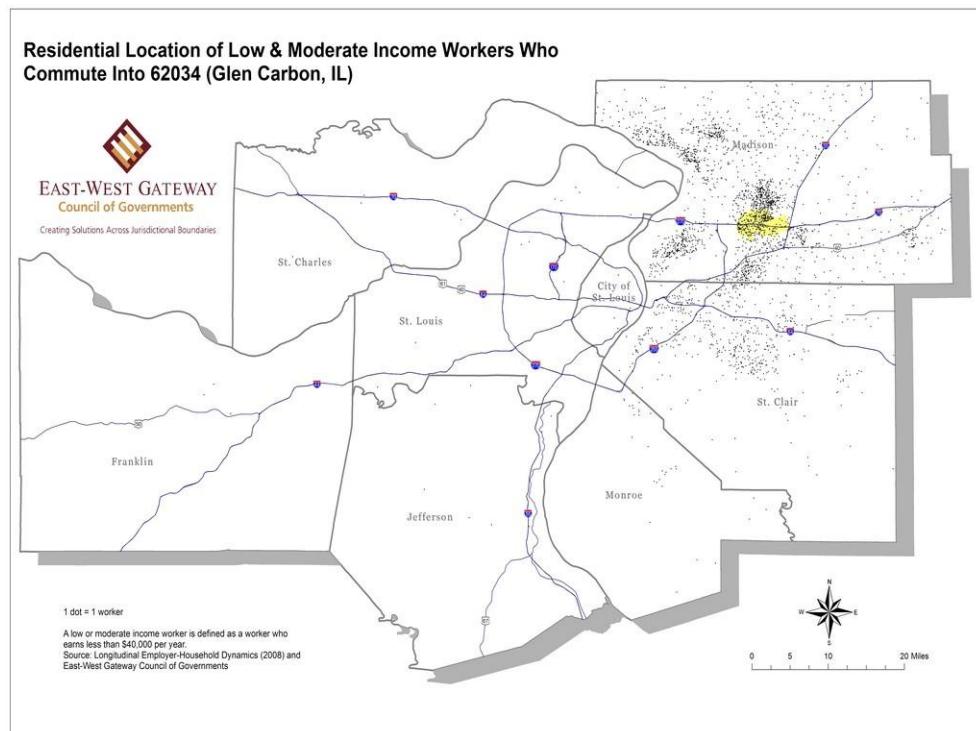
The highest average mobility rates by school district in elementary schools was in Venice, with a mobility rate of 28.3%, while the lowest average mobility rates were in Edwardsville, with a 6.83% average mobility rate in all elementary schools.

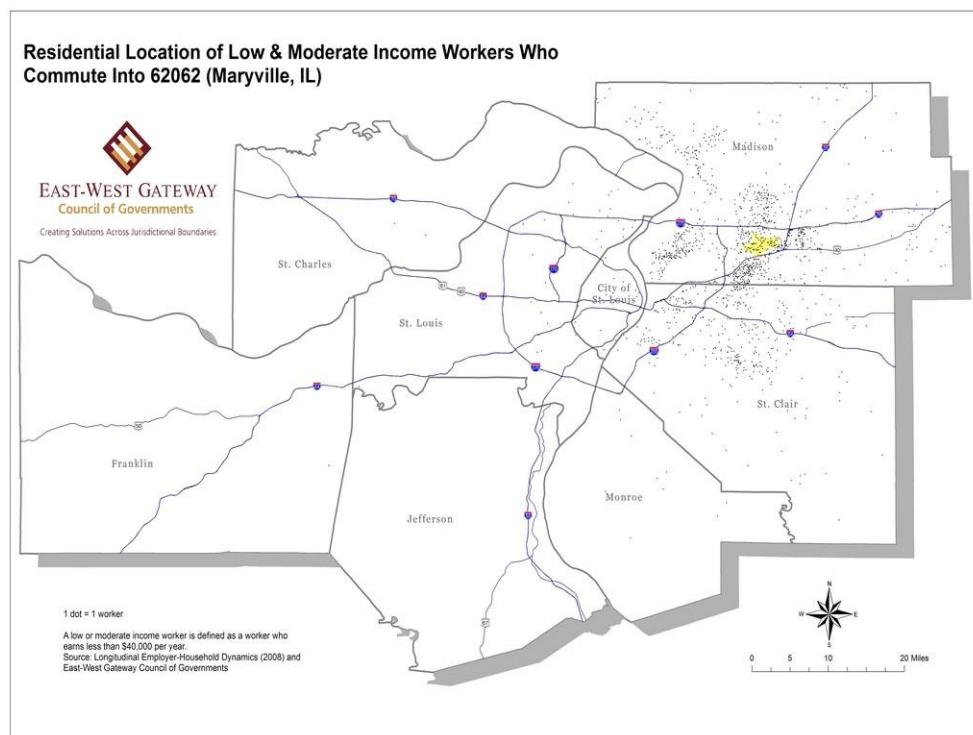
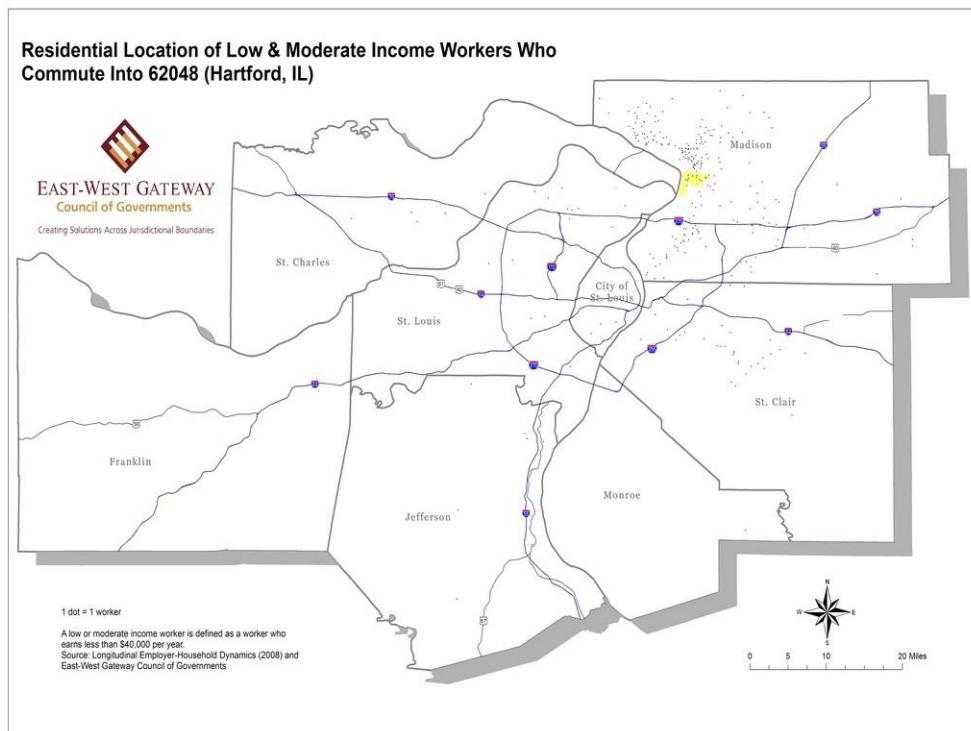
E. Transportation

Madison County Transit operates public bus service throughout Madison County, along with paratransit service for the disabled and elderly, bikeway development, and oversees a regional carpooling initiative called RideFinders. The transit service also links to downtown St. Louis and to Metrolink, the region's light rail system. MCT has a daily ridership of 8,000, and an annual ridership of 2.3 million.³² Buses serve many of the low-income housing developments in the county. Bus service operates throughout the western, central and eastern areas of Madison County.

An analysis was conducted of commuting patterns, to see if there were communities in which the major concentration of low-income and moderate income workers lived outside the zip code. In the following communities, more low and moderate income workers were concentrated in areas outside the zip code in which they worked. The yellow shaded portions of the maps are the zip codes where employees worked. The dots portray where these workers live.







This analysis is important because it can demonstrate a mismatch between affordable housing options and jobs.

IV. FAIR HOUSING COMPLAINT, INVESTIGATION AND RESEARCH

A. Fair Housing Complaints Filed

In this region, fair housing complaints are filed with the U.S. Department of Housing and Urban Development, with the Illinois Department of Human Rights, with the private fair housing agency Metropolitan St. Louis Equal Housing Opportunity Council, and with private attorneys. Race and disability are the highest complaint categories in Madison County.

The U. S. Department of Housing and Urban Development received 18 complaints between 1/1/06 and 12/17/09. The complaints were filed on the following bases:

- Race (African American) – 9 complaints
- Disability (6 complaints)
- Familial Status (1 complaint)
- Race and Familial Status (1 complaint)
- Race and Sex (1 complaint)

There were significantly more complaints filed with HUD in St. Clair County in this period (39 complaints).

EHOC received 25 complaints from Madison County between 2002 – 2010. Most complaints were in the rental market. The most common basis for complaints was disability, followed by race and familial status.

Table 9: Fair Housing Complaints Filed with EHOC

Year	Basis	Type	Resolution
2002	Disability	Rental	Conciliated
2003	Familial Status	Rental	Admin Closure
2003	Race	Rental	Admin Closure
2003	Familial Status	Rental	Charged by IDHR
2003	Disability	Rental	Admin Closure
2003	Familial Status	Rental	Confidential Settlement
2003	Familial Status	Rental	Confidential Settlement
2004	Race	Rental	Admin Closure
2004	Familial Status	Rental	Settled \$1500
2004	Disability	Rental	Settled \$144,000
2006	Race	Lending	No Cause
2006	Disability	Zoning	Conciliated
2008	Gender	Lending	Conciliated
2008	Disability	Rental	Admin Closure
2008	Disability	Rental	Conciliated
2009	Race	Rental	Admin Closure
2009	Race	Rental	Admin Closure
2009	Race	Rental	Admin Closure
2009	Disability	Rental	Conciliated
2009	Race	Rental	Pending
2010	Disability	Rental	Pending
2010	Disability	Rental	Admin Closure
2010	Disability	Zoning	Pending
2010	Race	Advertising	Conciliated
2010	Race	Lending	Pending

The Illinois Department of Human Rights provided information about complaints filed in Madison County between 2005 – 2010. During this period there were 24 complaints received, with Race as the highest complaint category (12 complaints), followed by disability (9 complaints) and familial status (3 complaints). Most of the disability cases involved a person with a physical disability (8 complaints), but one involved a person with a mental disability. Of the 24 complaints, 10 were closed due to lack of substantial evidence. In 8 cases, a settlement was arrived at, so the complainant withdrew as a result of that settlement. Five were closed due to administrative reasons, such as not being able to locate the complainant. One case was still pending as of August 24, 2010. No case received a “Substantial Evidence” or “Default” finding.

Private attorneys have handled a handful of cases in federal court in Madison County. Thomas E. Kennedy III has been the most active in the fair housing arena in Madison County. Kennedy represented Oxford House, a supportive group home for persons with addiction disorder, against the city of Granite City in 2001. This case settled for \$267,500. Kennedy also represented IMPACT in a design and construction case in 2001 regarding several 4-unit condominiums in Highland, and IMPACT and EHOC in a lawsuit against the Granite City Housing Authority, in another design and construction case which settled for \$144,000. Also in 2001, Kennedy represented the Community Counseling Center of Northern Madison County in a group home / zoning case against the City of Alton for failure to approve a permit for the building of Yakubian Manor, a group home for six persons. Kennedy represented Jean Jackson and EHOC on a familial status lawsuit in 2004. Finally, Kennedy

represented residents of Madison County Sheltered Care Home against the City of Collinsville for denying a zoning application that would have created housing opportunities for them.³³ According to county officials, the case was settled and Collinsville Commons has been rehabilitated and is providing 29 supportive housing units.

Because of work sharing agreements between the U.S. Department of Housing and Urban Development and the Illinois Department of Human Rights, and because EHOC files cases with both agencies and has also been represented by private attorneys, it is not possible to identify the aggregate number of cases filed in Madison County, as there may be some overlap between cases reported by each agency.

B. Case Spotlights

In 2010, EHOC received a complaint from an African American woman who had lived in a gated community governed by a homeowner's association. She noticed that the declaration for the homeowner's association allowed only white people to purchase property in the subdivision. Although she knew that the restrictive covenant was not enforceable, she felt strongly that it needed to be changed, and that it may have a chilling effect on other people of color who consider living there. She contacted EHOC and filed a complaint. EHOC was able to assist in redrafting the declaration to remove the discriminatory language.

In 2003, Jean Jackson was looking for a home for herself and her two children. She wanted to stay in her children's school district, and had limited opportunities for rental housing within this area. She contacted a housing provider about a rental unit she was interested in which happened to be situated on a golf course, but was told that her kids might attempt to skateboard and cause damage to the golf course so that property wasn't available to her. As it happened, directly under the ad in the *Suburban Journals* for the property she had responded to was an ad placed by EHOC. The ad featured a picture of a girl carrying a doll with the tagline "If you don't want to fight housing discrimination for yourself, do it for your kids." Jackson saw the ad and contacted EHOC and a lawsuit was filed in federal court on January 22, 2004. With TV cameras looking on, Jackson recounted her experience of being denied housing because of what she called her "two greatest assets: her children."³⁴ The case settled for a confidential amount.

In 2004, EHOC partnered with IMPACT Center for Independent Living in Alton, Illinois, and filed suit against the Granite City Housing Authority, for designing 36 new units of public housing for seniors in a manner that failed to meet the accessibility requirements of the Fair Housing Act. EHOC had spoken to residents at the complex that were unable to use wheelchairs in the bathroom. The complaint alleged that Environs Architects and the Granite City Housing Authority failed to construct usable kitchens and bathrooms, accessible environmental controls, an accessible route to the dwelling units, or reinforced walls in the bathroom for the later installation of grab bars. In 2005, that complaint was resolved, resulting in a \$144,000 settlement. The Granite City Housing Authority agreed to retrofit the 36 units in Anchorage Homes in accordance with the design and construction requirements of the Fair Housing Act.³⁵

C. Review of Advertisements

The Metropolitan St. Louis Equal Housing Opportunity Council reviewed advertisements for housing for one week in July 2010 in online publications and websites including *Alton Telegraph*, *Edwardsville Intelligencer*, and Craigslist listings in Madison County.

We noted seven instances words or phrases to suggest familial status discrimination in advertising (“50+ Active Adult Community,” “quiet” building, “adult community,” per person rent charges). We noted one case of gender discrimination in advertising (“perfect for girl students”), and one instance of disability discrimination (“no SSI”). We also noted advertising that HUD guidance suggests should be used with caution (“exclusive”). Finally, we noted several ads that showed the use of affirmative advertising, which is to be encouraged by advertisers. These included “Sect. 8 ok” and “Handicapped accessible.”

D. Review of Housing Discrimination Testing

Housing discrimination testing is a valid tool for investigating possible discriminatory treatment in the housing market. This method of investigation has been used in large housing discrimination studies (HDS) by the U.S. Department of Housing & Urban Development, and the practice has been held up in numerous court cases as a valid way of proving discrimination. Tests are conducted by sending trained volunteers into the housing market to inquire about homes for sale or for rent or to inquire about mortgage lending products. Testers are matched so that they are equally qualified for the type of housing sought. When testing for race, for example, a White tester and a Black tester are sent, who are evenly matched in all other respects. The Metropolitan St. Louis Equal Housing Opportunity Council conducted seven rental tests (five matched pair tests and two single tests) and five matched pair sales tests in order to ascertain any patterns of discrimination. Of those twelve tests conducted, three showed a difference in treatment: two based on familial status, and one based on race.

Two accessibility tests were conducted. As noted earlier in this study, Madison County has a scarcity of units that are subject to the Fair Housing Act accessibility requirements. In this case, the only two recent developments that could be located which had units available were senior communities.

A summary of the tests results are below:

Table 10: EHOC Rental Tests in Madison County

Test Area*	Tester's Paired	Test Type**	Description of Location Tested (Apt Complex/Apt Bldg/House/Condo/Twn House)	Property Inspected (# units)	Comments (Include assignment of Follow-up Tests)
Glen Carbon, IL	White Female / Black Female	Race	Apartment Complex	One / One	Test does not support discrimination
Wood River, IL	White Female / Black Female	Race	Apartment Complex	One / One	Test does not support discrimination
Wood River, IL	White Female / Black Female	Race	Apartment Complex	One / One	Test does not support discrimination
Collinsville, IL	White Female / Black Female	Race	Apartment Complex	Two / Two	Difference in treatment noted – Familial Status
Edwardsville, IL	Black Female Kids / Black Female No Kids	Familial Status	Apartment Complex	Two / Two	Test does not support discrimination
Glen carbon, IL	White Female	Accessibility	Senior Housing	One	Test does not support discrimination
Glen carbon, IL	White Female	Accessibility	Senior Housing	One	Test does not support discrimination

Table 11: EHOC Sales Tests in Madison County

Test Area*	Tester Pair	Test Type**	Description of Location Tested (Apt Complex/Apt Bldg/House/Condo/T w n House)	Property Inspected (# units)	Comments (Include assignment of Follow-up Tests)
Troy, IL	Black Female Kids / Black Female No Kids	Familial Status	two bedroom home	One / One	Difference in treatment noted – familial status
Troy, IL	Black Female / White Female	Race	four bedroom home	One / One	Difference in treatment noted – Race
Granite City	Black Female / White Female	Race	three bedroom home	One / One	Test does not support discrimination
Alhambra	Black Female / White Female	Race	four bedroom home	One / One	Test does not support discrimination
Maryville	Black Female / White Female	Race	three bedroom home	One / One	Test does not support discrimination

Familial Status Finding #1: *Agent informed tester that she generally like to put older single people without children in another area of the complex.* This treatment indicates steering on the basis of familial status.

Familial Status Finding #2: *Both testers were informed that the homes were for adults 50 and older, and no children were allowed. Agent was willing to offer homes to both testers under 50 years of age, and agent informed one tester that “as long as they have no children something could be worked out.”* The Housing for Older Persons Act allows retirements communities that offer housing for persons 62+ (where all units are occupied by persons 62+) and 55+ (where 80% of units are occupied by at least one person 55+) to exclude families with children. This housing provider does not meet the Housing for Older Persons Act familial status exemption because the housing is for persons 50+, and exceptions are being made for younger adults as long as they do not have children.

Race Finding #1: *Agent time with Black tester was brief, and information provided was limited compared to the White tester. White tester was told about school district and was referred to a discount financing program whereas Black tester was not.* Fair housing training is recommended, agent needs to understand that information provided to prospective homebuyers should be conveyed equally.

E. Review of Zoning Practices

Madison County certified to HUD that the county does not set minimum building size requirements and the county's zoning map provides sufficient land use and density categories (such as multifamily

housing, duplexes and small lot homes) and has sufficient land mapped “as of right” that can permit building of affordable housing.

The City of Alton provided information on a zoning change which expanded multifamily zoning on 5/25/05. The City of Highland provided information on zoning changes, all of which allowed higher density housing. The City of Wood River provided information that there was one zoning change approved on August 16, 2007 that expanded multifamily zoning by 3.98 acres. The following jurisdictions stated that there were no zoning changes which would reduce or expand areas zoned multifamily: Alhambra, Bethalto, East Alton, Granite City, Glen Carbon, Hartford, Marine, Maryville, and Pontoon Beach.

The City of Alton provided information that they granted a special use permit for a group home for persons with disabilities on 8/28/08. The City of Granite City provided information that a zoning variance for group home, Granite City Commons, was requested and granted. The City of Wood River provided information on a special use permit for a group home requested and approved on September 6, 2007. The following jurisdictions stated that there had been no applications for zoning variances for group homes or congregate facilities for persons with disabilities: Alhambra, Bethalto, East Alton, Glen Carbon, Hartford, Marine, Maryville, and Pontoon Beach.

F. Review of Lending Patterns

An analysis was done of all mortgage loans reported under the Home Mortgage Disclosure Act (HMDA) for 2008.

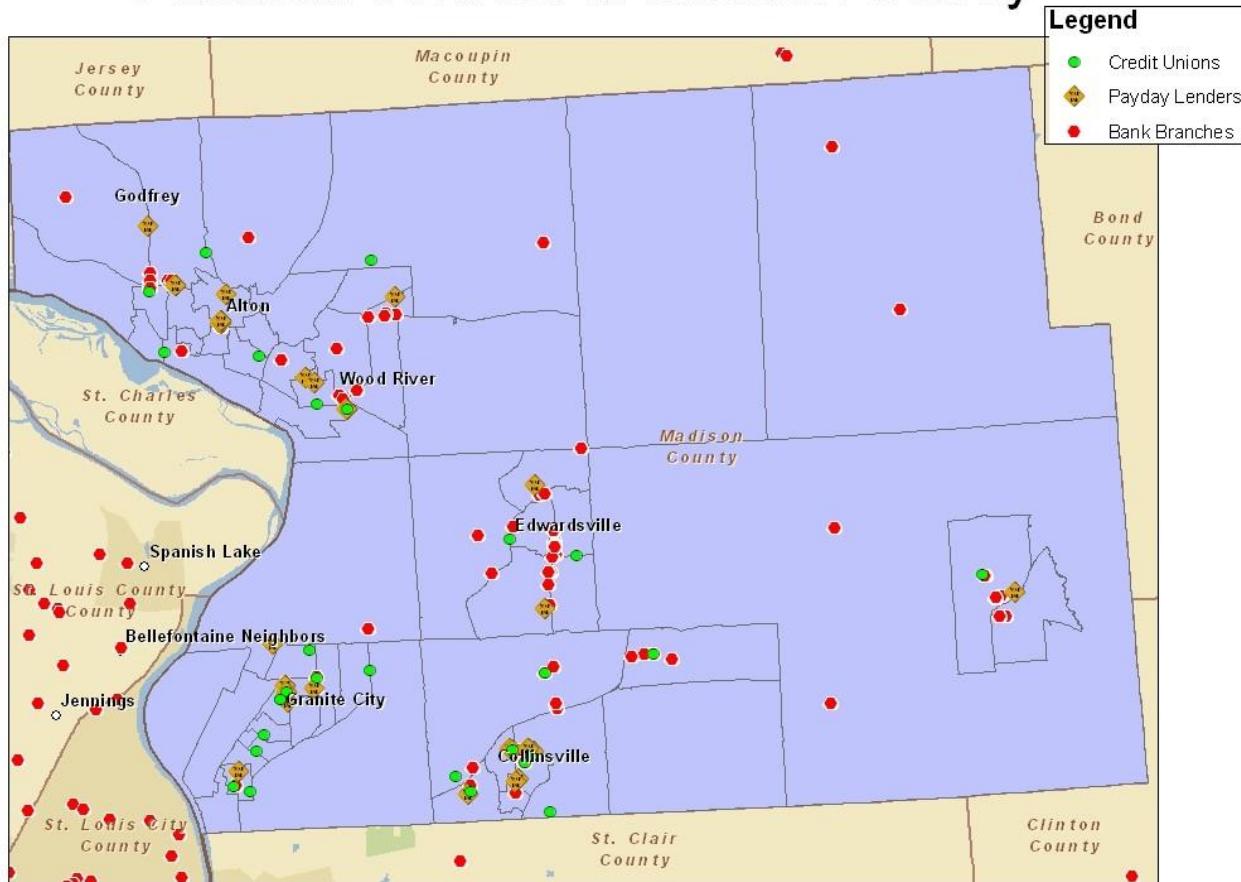
Table 12: HMDA Loans by Race and Income

Percentage of Loans Made to:	
White Borrowers	90.23
Black Borrowers	7.31
Asian Borrowers	0.6
Hispanic Borrowers	1.52
Other Borrowers	1.86
Percentage of Loans Made to:	
Low Income Census Tracts:	0.98
Moderate Income Census Tracts:	25.85

This data is important when viewing individual bank performance, to see if an individual bank is doing better than the aggregate at reaching low- and moderate- income borrowers and at reaching racial minorities, or whether it is doing worse.

Financial services in Madison County are clustered, with most banking locations existing in Edwardsville, credit unions serving the Granite City area, and payday lenders clustered in Alton, Collinsville and Granite City. The eastern part of the county has few financial services, with the exception of Highland. Venice, Roxana, South Roxana and Hartford are some of the communities that have no financial services of any kind.

Financial Services in Madison County



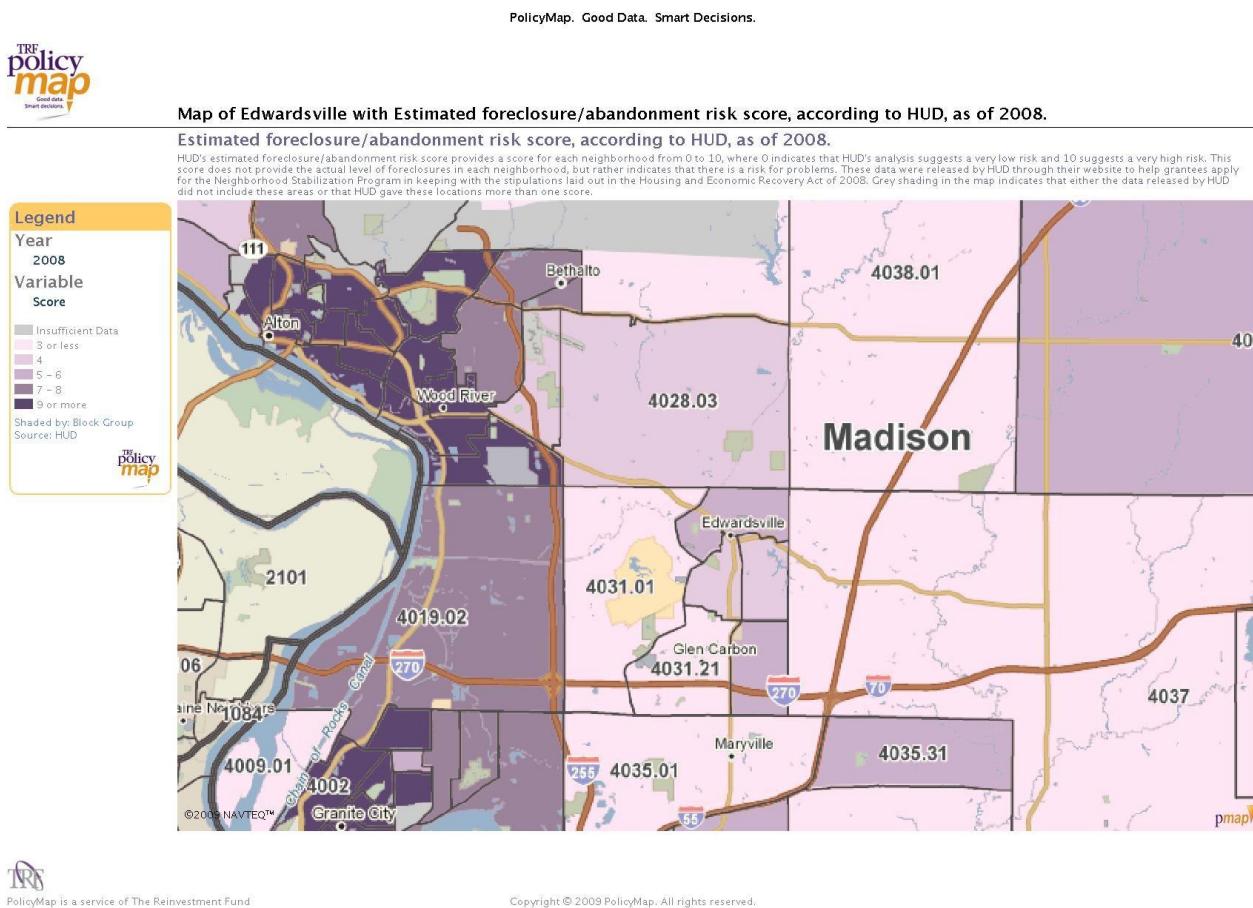
The foreclosure crisis continues to impact Madison County, as delinquency and foreclosure rates continue to rise.

Table 13: Foreclosure and Delinquency³⁶

90+ Day Delinquency Rate -December 2009	5.8%
90+ Day Delinquency Rate - Year Ago	4.2%
Percentage Point Change in 90+ Day Delinquency Rate	1.6%
Foreclosure Rate -December 2009	1.8%
Foreclosure Rate - Year Ago	1.5%
Percentage Point Change in Foreclosure Rate	0.3%
REO Rate -December 2009	0.5%

Low-and moderate-income areas as well as areas with high minority populations, such as Venice, Madison and Alton, have been disproportionately affected by the foreclosure crisis. In addition, the areas of Granite City, Wood River and East Alton have been similarly affected. These are also the areas with more alternative financial institutions, such as payday lenders. It is critical that there be efforts made to assist homeowners to mitigate foreclosure risk, in these areas in particular; to ensure that REO properties are being maintained and do not present security risks; to target housing and financial counseling efforts in these areas; and to ensure that foreclosed properties aren't allowed to become derelict or to be used for speculative purposes by investors, waiting for the market to improve. Communities around the country facing similar challenges have used strategies of creating community land trusts to hold such properties or to engage in public land banking and community planning to re-envision neighborhoods.

County officials note that there are active efforts in East Alton, Granite City, Madison and Alton to identify properties that have become derelict and can be torn down and be available for new construction. County officials note that East Alton has had a serious problem with derelict housing and increased code enforcement efforts in response. Derelict properties have been torn down and new housing construction has taken place on those sites. In Madison, properties have also been torn down and are being set aside for new construction.³⁷



G. Examination of Community Attitudes and Education on Fair Housing

For the purposes of this study, EHOC submitted questionnaires to community contacts to explore whether there was discrimination that people in the community were experiencing and not reporting; to examine attitudes about fair housing; and to assess the level of awareness about fair housing laws. The questionnaires were distributed during meetings of the Community Collaborative and the Continuum of Care as well as distributed to other community leaders. Fifty-one surveys were returned. Below is a summary of the results:

1. The Fair Housing Act makes it illegal to discriminate in housing based on race, color, religion, gender, familial status (protects pregnant women and families with children under the age of 18), and disability. These are called "protected classes" under the Fair Housing Act. Practices that are outlawed include refusing to rent or offer different terms or conditions based on one's protected class. The law also prohibits sexual harassment and discriminatory advertising. In the past five years, have you heard of or encountered any cases of housing discrimination in Madison County? If so, what action did you take?

	Number of Response(s)	Response Rate
Yes	16	31.3%
No	32	62.7%
No Responses	3	5.8%
Total	51	100%
17 Comment(s)		

2. The Fair Housing Act has additional protections for persons with disabilities: housing providers are required to make reasonable accommodations for persons with disabilities (an exception in a policy or procedure to allow a person with a disability to fully enjoy their housing), and allow reasonable modifications (structural changes to make a dwelling accessible to a person with a disability). In addition, new multifamily housing built after 1991 has to be designed and constructed to basic level of accessibility for persons with disabilities. In the past five years, have you heard of or experienced disability discrimination in Madison County? If so, what action did you take?

	Number of Response(s)	Response Rate
Yes	5	9.8%
No	41	80.3%
No Responses	5	9.8%
Total	51	100%
7 Comment(s)		

3. The Illinois Human Rights Act provides additional protections from housing discrimination based on age, marital status, military status / unfavorable discharge from the military, and sexual orientation. In the past five years, have you heard of or experienced any violations of the Illinois Human Rights Act in Madison County? If so, what action did you take?

	Number of Response(s)	Response Rate
Yes	5	9.8%
No	41	80.3%
No Responses	5	9.8%
Total	51	100%
4 Comment(s)		

4. Madison County has areas that are racially segregated. For example, the communities of Alhambra, Jacob, and Worden are almost exclusively white (no African Americans live in any of these places) while the community of Venice is predominately black (93.5% black, 5.5% white). What, in your mind, explains segregation? (Check all that apply.)

	Number of Response(s)	Response Rate
Concentration of public and subsidized housing in segregated neighborhoods	27	57.4%
Condition of existing housing stock in segregated communities	8	17.0%
Crime rates in segregated communities	21	44.6%
Discriminatory lending practices by banks and / or mortgage companies	13	27.6%
Educational choices available in segregated communities	10	21.2%
Employment patterns	16	34.0%
Exclusionary zoning policies of local governments	10	21.2%
Historical patterns of exclusion and discrimination	31	65.9%
Lack of information home seekers have about other communities	9	19.1%
Lack of affordable housing in segregated communities	26	55.3%
Marketing and advertising practices of developers or housing providers	4	8.5%
Police stops of those in areas in which they are a racial minority	16	34.0%
Preference for people to live among others that are similar to them	27	57.4%
Public perception about crime rates and educational quality	22	46.8%
Public transportation availability in segregated communities	21	44.6%
Racial steering by real estate agents	17	36.1%
Real estate agents' lack of familiarity with areas populated by other races	9	19.1%
Refusal of landlords to rent based on race	16	34.0%
Valuations used by appraisers to depress/inflate property values	12	25.5%
Violence, threats, intimidation or harassment directed against minorities	24	51.0%
Other	5	10.6%
Total	47	100%
4 Comment(s)		

5. Of the factors listed above, which 1 – 3 factors do you believe are the main reasons for racial segregation in Madison County?

	Number of responses
Historical patterns of exclusion and discrimination	14
Preference for people to live among others that are similar to them	10
Public perception about crime rates and educational quality	9
Lack of affordable housing in segregated communities	8
Concentration of public and subsidized housing in segregated neighborhoods	7

6. Some communities in Madison County are racially integrated. For example, Madison is 55% white and 72% white and 25% black; and Fairmont City (a small portion of which is in Madison County) is 55% Hispanic white. Why, in your mind, are some communities more integrated than others? Please check all that apply.

	Number of Response(s)	Response Rate
Communities are in racial transition and are not stably integrated	13	28.2%
Community and religious organizations promote integration	10	21.7%
Diverse housing choices are available in integrated communities	23	50.0%
Educational choices in integrated communities contribute towards diversity	10	21.7%
Employment opportunities contribute towards integration	20	43.4%
Leadership in the private sector promotes integration	5	10.8%
Political leadership promotes integration	8	17.3%
Public policies which promote integration and celebrate diversity	8	17.3%
Segregation and dividing lines exist within these communities	23	50.0%
Other	2	4.3%

7. What are the greatest barriers for persons with disabilities in finding and maintaining housing?

	Number of Response(s)	Response Rate
Failure of housing providers to make reasonable accommodations	25	53.1%
Failure of housing providers to allow reasonable modifications	24	51.0%
Lack of accessible housing	25	53.1%
Lack of affordable housing for persons on disability benefits	36	76.5%
Lack of education on fair housing	10	21.2%
Lack of funds available to make reasonable modifications in rental housing	24	51.0%
Lack of funds available to make reasonable modifications for homeowners	19	40.4%
Lack of integrated housing choices for persons with disabilities	10	21.2%
Lack of supportive housing (housing with supportive services for residents)	11	23.4%
Local government zoning practices that keep out group homes	10	21.2%
NIMBY attitudes of communities that oppose housing for disabled	17	36.1%
Refusal of landlords to rent based on disability	4	8.5%
I am not aware of any barriers for persons with disabilities in housing	1	2.1%
Other	2	4.2%
Total	47	100%

8. Of the factors listed above, which 1 - 3 factors do you feel are the major barriers for persons with disabilities in housing?

Number of Responses
Lack of affordable housing for persons on disability benefits
15
Lack of funds available to make reasonable modifications in rental housing
8

9. Are you aware of any fair housing programs or activities occurring in Madison County? If so, pl

	Number of Response(s)	Response Ra
Yes	14	27.4
No	31	60.7
No Responses	6	11.7
Total	51	100%

10. Can a landlord advertise that an apartment is available to "Adults Only"? Correct answer: N

	Number of Response(s)	Response R
Yes	15	29.4
No	30	58.8
No Responses	6	11.7
Total	51	100%

11. Are boys and girls required by law to have separate bedrooms? Correct answer: NO

	Number of Response(s)	Response R
Yes	23	45.0
No	22	43.1
No Responses	6	11.7
Total	51	100%

12. A landlord receives an application from someone receiving disability benefits. It is not clear to the landlord what disability the applicant may have, so he asks the applicant to supply information about the disability in order to determine if the housing is appropriate for that individual. Is this legal? Correct answer: NO

	Number of Response(s)	Response Rati
Yes	11	21.5%
No	34	66.6%
No Responses	6	11.7%
Total	51	100%

13. A landlord rejects an African American applicant because the applicant does not meet her credit requirements. Is this legal? Correct answer: YES (As long as same credit requirements are used for all applicants.)

	Number of Response(s)	Response Rate
Yes	40	78.4%
No	5	9.8%
No Responses	6	11.7%
Total	51	100%

14. Whom would you contact to file a fair housing complaint?

17 left the question blank, 7 more put a question mark or said "I don't know".

Other responses were: EHOC, IDHR, HUD, Urban League, Department of Justice, States Attorney, Madison County Housing Authority, Continuum of Care, Land of Lincoln Legal Assistance Foundation, Beyond Housing, Edwardsville Human Relations Commission and EEOC.

H. Review of Practices and Policies Contributing to Racial Segregation

In the community survey that was conducted, a question was asked about why this racial segregation exists between Black and White populations. One responder pointed out that the communities with no Blacks were "mostly farm, not major population centers," while another respondent said that one of the reasons for this pattern was "urban vs. rural." While it is certainly true that all of these communities are rural, the data points to some other reason for this exclusion. If other populations of more recent migrants to the area (Asians, Hispanics) live in small numbers in many of these communities, and if multiracial populations exist in all of these communities except one, but none of them are multiracial Black / White, there must be some other explanation.

In his landmark study *Sundown Towns*, Professor James Loewen documents the widespread practice that existed across the United States—primarily from 1890 to 1968—of keeping African Americans or other groups from living in certain towns and communities. Loewen defines a "Sundown Town" as "any organized jurisdiction that for decades kept African Americans or other groups from living in it and was thus 'all-white' on purpose....many towns clearly and explicitly defined themselves as sundown towns but allowed one black household as an exception. Thus an all-white town may include nonblack minorities and even a tiny number of African Americans."³⁸ Loewen has collected copies of "Sundown" ordinances, restrictive covenants and photographs of signs posted in towns and cities that enforced these exclusionary policies. Although these ordinances were no longer enforceable after the Fair Housing Act was passed in 1968, and signs have been removed from communities, Loewen also records exclusionary policies that continue to exist in some of these communities, while other communities have clearly changed. He documents continued exclusionary policies through the use of police powers, real estate practices, and violence, intimidation and harassment.

Loewen documents 475 towns with a "sundown" past—towns and cities with a population greater than 1000 that did not allow Blacks to live there or to be in town after sunset—in Illinois alone, a full 71%

of Illinois communities. He confirmed the existence of exclusionary policies by examining census data, local histories, newspaper accounts and oral histories. Dr. Loewen did not examine towns with a population of less than 1000 unless someone brought them to his attention. In his online database, Dr. Loewen has confirmed the following information about towns with a “sundown” history in Madison County:³⁹

Table 14: Communities with a Sundown Town History⁴⁰

Place	Was this a Confirmed Sundown Town?	Was there an Ordinance?	Was there a sign?	Is the town still Sundown?	Which Group Was Excluded?
East Alton	“Surely”*	“Yes, written evidence”	“Yes, strong oral tradition”		Black
Glen Carbon	“Surely”	“Yes, written evidence”	“Yes, strong oral tradition”	“Surely not”	Black
Granite City	“Surely”	“Yes, written evidence”	“Don't Know”	“We have data on how it changed”	Black
Wood River	“Possible”	“Yes, Strong Oral Tradition”	“Yes, strong oral tradition”		Black

*Quotations are from James Loewen's tables

After conducting historical research, Loewen has put the information on his website and included comments from the public. The comments that he has collected about these towns, mostly from former residents, shine more light on practices. One commenter says: “Things haven't changed all that much in E. Alton. I moved to the area about four years ago and was looking for a place to live. With a daughter in junior high, one very pertinent question was 'how are the schools here?' I asked a prospective landlord this and his answer was, 'Well I tell you this...we don't have none of THEM PEOPLE in our schools.' Again, this was in 2004.”⁴¹ A Madison County official states that East Alton is making efforts towards diversity in the community. New housing developed using village and county resources now advertises in a free county-wide publication, the *Advantage*. Also, East Alton recently rezoned a neighborhood to allow for the development of Theodoro apartments, a multi-unit special needs housing development for homeless mentally ill persons.⁴² Madison County Community Development has assisted three Black families in purchasing houses in East Alton in the past five years.⁴³

Loewen has other data, not as specific, identifying the following communities as “suspect” for having a “sundown town” past: Bethalto, Fairmont City, Hartford, Highland, Livingston, Madison, Maryville, Rosewood Heights, Roxana, St. Jacob, South Roxana, Troy and Worden.⁴⁴

Although EHOC's survey indicates that historical patterns of exclusion continue to impact residential patterns of segregation today, there are hopeful signs that many of these communities are changing. For example, Glen Carbon had a written “sundown” ordinance. Regarding Glen Carbon's historical practices, Loewen comments: “The town was extremely hostile to blacks, possibly not even letting them travel through.” Clearly, this is not still the case today, as Blacks and other minorities work, shop

and live in Glen Carbon. County officials state that they assisted three Black families with purchasing homes in Glen Carbon through their homebuyer program.⁴⁵ There have been notable demographic changes in Granite City. Loewen reports that between 1890 and 1930, Granite City had an African American population and even an African American school, but as each year passed the population dwindled. One commenter states about changes in Granite City: "Today Granite City has a small and growing black population that seems to fare OK."⁴⁶

In the demographic profile above, eight communities were noted in which no Blacks live, nor any multiracial Black / White populations, with seven additional communities in which there are fewer than two households with a Black householder. As can be seen by the following map, some of these communities overlap the communities documented or suspected of being "Sundown Towns" by Professor Loewen.

Exclusionary Communities in Madison County



Legend

- Communities with 2 or Fewer Households with Black Householder¹
- ✚ Communities with a Confirmed History as a "Sundown Town"²
- ❓ Communities Suspected of Being or Having Been a "Sundown Town"³

¹Census 2000

²James Loewen, "Possible Sundown Towns in Illinois" <http://sundown.afro illinois.edu/sundowntownshow.php?state=IL>

³James Loewen, "Population Files for Towns in Selected States," from http://sundown.afro illinois.edu/population_files/90censuY.xls

I. Evaluation of County Fair Housing Activities

The last Analysis of Impediments (AI) Study conducted by Madison County was released in 2000. The study identified the following general impediments:

- Zoning boards are not diverse and zoning powers are sometimes used to restrict affordable housing and group homes for persons with disabilities.
- Racial / ethnic profiling by law enforcement officers creates a climate unfriendly to minorities.
- Educational funding formulas negatively impact schools in areas of concentrated poverty.
- Neighborhood revitalization efforts in Alton and Granite City do not appear to be expanding affordable housing opportunities.
- There is a lack of education about fair housing laws, particularly around disability issues.
- Housing providers continue to engage in acts of discrimination.
- Blacks and Hispanics at all income levels are more often denied loans than White borrowers.
- Although the real estate industry has made great strides in demonstrating its commitment to fair housing, racial steering by individual real estate agents still appears to persist. Housing discrimination testing is needed to verify real estate practices.
- Builders circumvent accessibility requirements by constructing multistory townhouse units.
- Hate crimes persist and individual attitudes need to be changed.
- Madison County is highly racially segregated.

The 2000 AI Study recommends that the county take the following actions:

- Initiate a Fair Housing Awareness Program in collaboration with the Metropolitan St. Louis Equal Housing Opportunity Council.
- Initiate a Fair Housing Testing Program in collaboration with the Metropolitan St. Louis Equal Housing Opportunity Council.
- Continue efforts to increase affordable and accessible housing through Madison County Community Development's Housing Rehabilitation, Lead SAFE 2000, Homebuyer and Homebuyer Plus programs.
- Conduct an annual review of HMDA data for all mortgage lenders in the county.

In its 2005 – 2009 Consolidated Plan, Madison County outlined the following actions to promote fair housing:

- Collaboration with Madison County Urban League to provide certified housing counseling and fair housing counseling services throughout the County.
- Participation in St. Louis Regional Fair Housing Collaborative and attendance at fair housing conferences.
- Contracting with EHOC to provide fair housing education and outreach sessions.
- Passing County Board resolutions declaring April as Fair Housing Month.
- Educating all homebuyers on fair housing.

Madison County did initiate a year-long fair housing awareness program in collaboration with the Metropolitan St. Louis Equal Housing Opportunity Council in 2004. However, no further consistent training program was continued, and no testing program was forthcoming until the pilot testing contained in this study.

Madison County has continued to increase affordable housing opportunities, though too many of these opportunities have been located in areas with the least growth, the fewest opportunities, and the most troubled schools. It is also important to remember that affordable housing cannot be a proxy for fair housing. These are different issues, though there are areas of convergence, and must be considered differently.

This review has not found that there has been a significant increase in accessible housing relative to the amount of new housing being constructed. It is essential that accessibility requirements be adopted for housing with fewer than four units that is not currently covered under the Fair Housing Act and that represents the majority of building occurring in the County. Concurrently, measures should be taken to ensure that areas with no new multifamily building, and areas with little affordable housing, are open to the construction of multifamily housing. With the creation of more new multifamily housing will come more units that are required to be accessible under the Fair Housing Act design and construction requirements.

There has not been a consistent review of HMDA data for mortgage lenders in Madison County. However, this study recommends that the Treasurer's Office implement a new priority in its investment policy, requiring the Treasurer to give a preference when deciding where to invest county funds to lenders that have excellent CRA performance evaluations and fair lending records. This process, combined with the analysis now being done by the St. Louis Equal Housing and Community Reinvestment Alliance and made publicly available at www.slehcra.org should make it easier to have a consistent review process of the lending patterns of banks operating in Madison County.

IV. IDENTIFICATION OF IMPEDIMENTS TO FAIR HOUSING CHOICE

Impediment #1:

Fair Housing Planning Needs Improvement

Fair housing planning has too often been a regulatory requirement that is reviewed only when required by HUD and has not infused the planning process. Fair housing planning has not been a participatory process. Too often, AI plans sit on shelves of county officials, dusted off in time to meet the next requirement. Community residents are not aware of the goals and recommendations of these plans and there is little community buy in, and little accountability.

Goal: Fair Housing Planning and Implementation: An Ongoing Public Process

Recommendation 1: This AI will be condensed to a usable format for public dissemination and awareness. EHOC is creating a flyer for each of the impediment areas.

Recommendation 2: The AI will be made publicly available. The 9 flyers (or an html version) will be placed on Madison County's website and the full AI will be accessible for those who would like more detailed information. The website should solicit public feedback through an online comment process.

Recommendation 3: The AI will spark community discussion and public awareness. Each impediment area should be the basis for a community discussion or presentation, held in different parts of the county, in fulfillment of the county's Public Hearing requirements for the approval of annual action plans and annual performance reviews (CAPERs). These hearings are commonly perfunctory, but they can be used to create public awareness and actions. Each of these public hearings will be organized as a Community Forum to be held at community centers, offices of social service agencies, faith communities, educational institutions and other places where people feel comfortable expressing their views. Community organizations such as United Congregations of the Metro-East have expertise in conducting such community forums discussing sensitive issues of race, and the County should partner with community organizations to ensure broad participation.

Recommendation 4: A presentation for county officials will be conducted based on this AI to ensure that county officials, including building / zoning / planning / community development staff are aware of the analysis and recommendations of this AI, and to ensure that a fair housing lens is infused throughout the planning process.

Recommendation 5: Comments solicited through the website and provided at public hearings will be used in the process of updating this AI study in five years.

Measurable Outcomes:

- Flyers created

- 5 public hearings in a community forum that, in addition to covering CDBG requirements, open discussion of impediments
- Presentation for county officials held
- Website is changed to make AI accessible and to solicit public comment.

Impediment #2

Lack of Education on Fair Housing Persists

Front-line advocates, social service staff and county officials are not well informed of many fair housing requirements and do not know where complaints can be filed. Surveys distributed at Madison County's Continuum of Care and Community Collaboration showed that many were not aware of some aspects of fair housing law and enforcement. If front-line staff does not recognize discrimination and does not refer clients and community residents to proper enforcement agencies, fair housing enforcement will be unrealized.

Goal: Fair Housing Education: Vital to Ending Discrimination

Recommendation 1: In partnership with a qualified fair housing agency, educate 120 people per year who are front-line advocates and gateways to social services: people who work with racial, religious and ethnic minorities, LGBT centers, clergy, centers for independent living, legal aid attorneys, hospital social workers, advertisers for housing. These educational sessions should devote at least 30 minutes to training people on the basic requirements of fair housing, teaching participants how to recognize discrimination and educating them on where to refer complaints.

Recommendation 2: Continue to distribute brochures on fair housing at home buying seminars and counseling sessions. Madison County Community Development already distributes fair housing brochures to all participants of the Homebuyer program, and Madison County Urban League provides fair housing information and counseling to clients for which housing counseling is provided. These efforts should continue.

Measurable Outcomes:

- 120 people educated per year on fair housing
- Brochures distributed to all homebuyer clients

Impediment #3**Discrimination Persists**

The small testing project done as part of this study, and the review of rental advertising done, demonstrate that fair housing violations continue to exist. Three out of twelve tests showed a difference of treatment, two on the basis of familial status and one on the basis of race. Advertisements scanned showed discrimination on the basis of familial status, disability and gender. It is also clear from the comments received to the first three questions on the community survey that most people who experience discrimination do not file complaints.⁴⁷

Goal: Ensuring that the Housing Market is Open to All Regardless of Protected Class

Recommendation: Madison County should continue to support housing discrimination testing, on the basis of familial status, race, gender, national origin and disability. Madison County should contract with Metropolitan St. Louis Equal Housing Opportunity Council or another institution that can provide housing discrimination testing. Madison County should contract to provide at least 30 tests. After the tests are conducted, the County should review the testing with EHOC to analyze tests and to determine whether additional testing needs to be done.

Impediment #4:

People Concentrated in Low-Income Minority Communities Lose Opportunities

The highest degrees of racial segregation have the most significant economic impact on low and moderate income Blacks who are kept out of areas of opportunity. Blacks are disproportionately excluded from public schools that are making “Adequate Yearly Progress” annually. Low and moderate income Black homeowners are unable to access the benefits of homeownership through property value appreciation that similarly placed Whites are able to do. In some communities, low and moderate income workers of any race must pay extra transportation costs because they are unable to find housing in the communities where they work.

Goal: Moving to Opportunity: Ending Concentrated Poverty and Segregation

Recommendation 1: Madison County Community Development will use rental assistance vouchers issued through the Illinois Housing Development Agency (IDHA)'s Rental Housing Support Program to create 20 Opportunity Vouchers, combined with mobility counseling, to assist very low income families move to areas of high opportunity, using data from school assessments, employment opportunity data and other indicators to map areas of high opportunity. Mobility counseling will be provided to all families participating in the program to educate them on the benefits of moving to high opportunity areas and to assist them in identifying participating landlords and services and supports they may need to be successful in their transition. Madison County will provide mobility counseling and fair housing education to persons using these Opportunity Vouchers.

Recommendation 2: Madison County will retain a consultant to examine affirmative fair marketing plans of all publicly supported rental housing (housing supported by HUD, USDA, LIHTC, IDHA, and MCCD) and, to present recommendations to strengthen such plans to the respective housing providers, and, if need be, to the government agency supporting this particular housing project. Because publicly supported housing is affordable and available in racially segregated White and Black communities, opportunities are widely available to increase integration of these housing complexes.

Recommendation to improve affirmative fair housing marketing plans for all communities will include a requirement that housing providers advertise their properties on www.ilhousing.org, a free means for housing providers to market their housing and to inform potential applicants and service providers of affordable and accessible housing.

Recommendation 3: Madison County will initiate a new program to provide security deposit assistance for low income families using market rate housing who desire to diversify neighborhoods. Madison County Community Development will set aside a minimum of \$10,000 per year for security deposit assistance for this program. The program will be open to persons of all races who move to neighborhoods or census tracts populated by a high percentage of persons of another / other race. Madison County will provide mobility counseling and fair housing education to persons receiving this security deposit assistance.

Recommendation 4: Madison County will review all new plans to support publicly funded affordable

housing projects to determine the segregation impact of such projects. County officials will evaluate whether proposed projects would further concentrate affordable housing in areas of low opportunity and concentrated poverty, and if alternatives exist.

Impediment #5

Exclusionary Residential Patterns Continue

This study has identified over 20 communities that have had “sundown” policies in the past and or that have two or fewer Black households among their residents, a pattern that cannot be explained by economic factors or personal preferences. Some of these towns with historic “sundown” policies have clearly begun to change. With others, it is less clear whether unwritten “sundown” practices are still in existence. These exclusionary communities harm us all. Racial and ethnic minorities are kept out, in some cases, of high opportunity areas. Whites living in segregated communities are shut out from opportunities to develop cultural competency and understanding so important in a changing and diverse society, in which Whites will lose their majority status. Studies of graduates of integrated schools have documented the value of an inclusive education to persons from all racial backgrounds.⁴⁸

Goal: Ending Exclusionary Practices and Policies

Recommendation 1: Madison County will require all communities applying for funding to demonstrate inclusiveness. This could be in the form of joining the Inclusive Communities Partnership of the National League of Cities⁴⁹ and displaying a road sign indicating membership in this partnership (much like Tree City USA signs); creating a Human Relations Commission to work for fair and inclusive practices; having a fair housing ordinance; or undergoing a community process to examine past zoning, law enforcement or “Sundown” practices that have hampered integration, and to develop proposals for change. Communities that have been identified as exclusionary or having a “Sundown” past that do not demonstrate such inclusiveness should be ineligible for county funding.

Recommendation 2: Local municipalities in which there have been a significant number of units of single family housing built without constructing any units of 2- 4 family or multifamily housing should be required by Madison County to develop a housing plan within three years. This plan would require an evaluation of zoning practices to ensure that developers of 2 – 4 family and multifamily housing have an equal opportunity to develop these types of housing as developers of single family housing. This requirement would apply to Madison County, Bethalto, Godfrey and Troy.

Recommendation 3: Madison County will offer a “second lien” product of approximately \$10,000 forgivable after 10 years to persons who choose to purchase a home in a community populated by at least 90% people of another racial group. This product will be available to people of all racial groups. Communities will be classified as Minority (having at least 90% population of Blacks) and Majority communities (having at least 90% population of Whites). Blacks moving into Majority communities will be eligible. Whites, Asians and non-Black Hispanics moving to Minority communities (presently only Venice) will be eligible. Multiracial families will be eligible according to the race of the householder, as defined by the U.S. Census Bureau. Amount of lien and period of loan forgiveness will be evaluated on an annual basis to determine effectiveness. Administrators of this program will offer participants the ability to network on a voluntary basis with other participants through an integration pioneer support group.

Impediment #6**Educational Policies Have Contributed to Segregation**

While ambitious in its goals to ensure that students from all backgrounds receive an equitable education, federal educational policy under No Child Left Behind has had unintended consequences of contributing to racial segregation. There must be recognition among housing experts and educational leaders that housing policy is school policy⁵⁰: the two are inextricably linked, as families make moves primarily to increase educational opportunities for their children.

Goal: Increasing Educational Equity: Housing Policy Is School Policy

Recommendation: Madison County will create a Council of School Districts, inviting all 13 school districts to meet on a regular basis to work together on the goal of creating educational equity. This council may assist school districts in finding opportunities to consolidated declining districts, for example. Madison County will facilitate or sponsor these meetings, at least at the outset, and will provide representation at these meetings to ensure that the needs of those with limited English proficiency are met through the educational process and to raise awareness among educators of the community services offered by Madison County and its partner agencies.

Impediment #7**Lack of Efforts to Ensure the Stability of Integrated Communities**

There has been a historical pattern in our country that neighborhoods and communities that have been inclusive, often tend to resegregate, as racial minorities move into these communities and Whites engage in “White flight” or simply choose not to locate in these integrated communities. Efforts in areas like Oak Park, Illinois, Shaker Heights, Ohio, and Maplewood / South Orange, New Jersey, demonstrate that it takes significant community efforts to maintain balanced and integrated living patterns. These examples also show the benefits in living in a richly diverse community.

Goal: Supporting Stable, Integrated Communities

Recommendation 1: Madison County will create a Diversity Bonus for persons going through the Homebuyer Program whose move into a particular neighborhood will contribute to racial integration. The Diversity Bonus will be available to persons of all racial and ethnic backgrounds who move into communities in which their racial group is relatively underrepresented. It is anticipated that the Diversity Bonus would add approximately \$2000 to the assistance MCCD is providing the household already through its Homebuyer Program. The amount of the incentive and the demographic triggers will be evaluated on an annual basis to ensure that it is effective. The Bonus will be marketed to all Homebuyer applicants, but is available on a strictly voluntary basis. A decision by a homebuyer not to take advantage of the Diversity Bonus should not impact his/her ability to participate in the homebuyer program.

Recommendation 2: In Madison County Community Development's CDBG Application Criteria, 5 additional points should be awarded to communities than can demonstrate that the project they are undertaking will contribute to maintaining or creating a stably integrated community.

Impediment #8**Lack of Reinvestment in Low Wealth Communities**

The area of the highest concentration of poverty and Black racial segregation exists in Venice, which is also the area losing population the fastest and with the most troubled school district. While other initiatives in this plan give residents options to move to areas of high opportunity, there must be a concurrent commitment to rebuild and reinvest in declining and blighted areas.

Goal: Reinvestment: Bringing Opportunities to Low Wealth Areas

Recommendation 1: Madison County will leverage private funds for reinvestment. Madison County Treasurer's Office will add to its Investment Policy as a criterion for investment. The criteria shall state that the County will consider a financial institution's demonstrated success in achieving Community Reinvestment Act and fair lending goals. The policy will prioritize the use of institutions for investment and depository purposes who achieve "Outstanding" ratings, with a lesser priority for those achieving "High Satisfactory" ratings on lending, investment and service tests. The policy will also allow the Treasurer's Office to consider any CRA public comments or fair lending complaints against a financial institution when considering investment decisions. The Treasurer's Office will consult CRA ratings from regulatory agencies as well as private evaluations at such sites as www.slehcra.org in evaluating banks. The Treasurer's Office will implement the policy within the next year and will send letters to all eligible financial institutions about the new policy. For the first three years of the policy, the Treasurer's Office will allow financial institutions who currently have less than "high satisfactory" ratings to demonstrate CRA-related activities above and beyond what was taken into account during their past evaluation to be eligible.

Recommendation 2: The "second lien" program outlined in Impediment #4 will benefit reinvestment in areas such as Venice.

Recommendation 3: Madison County will continue its practice of awarding 9 points to projects benefiting 51% to 60% low and moderate income; 12 points to projects benefiting 61% to 100% low and moderate income, and 8 points for projects working to eliminate slums and blight.

Recommendation 4: Madison County Community Development will sponsor an annual workshop on Section 3 to promote job opportunities for those living in areas of high poverty and in public or assisted housing.

Impediment #9

Madison County is Unprepared for Senior Boom

Very few units of accessible community-based housing have been created in Madison County due to a preference for building single family homes. The only types of multifamily housing subject to the Fair Housing Act accessibility requirements that have been designed and constructed in recent years include public or subsidized housing, assisted living or skilled nursing facilities, or other forms of institutionalized housing. This trend makes Madison County ill prepared to address the “senior boom,” a major demographic shift taking place as the “baby boom” generation moves into its senior years.

Goal: Creating Access: Preparing for the Senior Boom

Recommendation 1: Madison County will increase funds available for accessibility home modifications of both rental and owner occupied housing to ensure that people with disabilities can modify current residences to meet their needs.

Recommendation 2: Madison County will require any single family, two family and three family homes built with County assistance to be “visitable,” a developing standard nationally that ensures that persons with disabilities can access the front door of a home and can use a first floor bathroom. This will also prohibit the use of county funds to construct multifamily multi-story townhomes that are not at least “visitable.”

Recommendation 3: Madison County will spearhead and support legislative efforts to pass a “Visitability” Ordinance to cover all new construction in the unincorporated areas of Madison County. Similarly, Madison County will give extra points on its CDBG application for communities that have passed “Visitability” Ordinances applying to all new construction. This will also prohibit the creation of multifamily multi-story townhomes that are not at least “visitable.”

Recommendation 4: Madison County will work with the Illinois Money Follows the Person program to ensure that Madison County residents are being given opportunities for transition to community based housing. Madison County will contact Jean Summerfield, Illinois Coordinator for the program, to request a speaker at the a Community Collaborative meeting.

Impediment #10**Persons with Disabilities Have Restricted Housing Choices**

The lack of accessible housing in a community based environment creates segregation and lack of opportunity for persons with disabilities, who won the guarantee of having opportunities to live in the most integrated setting possible based on their needs, with the Olmstead v. LC & EW 1999 Supreme Court decision.

Goal: Integration for Persons with Disabilities: Making Good on the Promise of *Olmstead*

Recommendation 1: Madison County will increase funds available for accessibility home modifications of both rental and owner occupied housing to ensure that people with disabilities can modify current residences to meet their needs.

Recommendation 2: Madison County will require any single family, two family and three family homes built with County assistance to be “visitable,” a developing standard nationally that ensures that persons with disabilities can access the front door of a home and can use a first floor bathroom. This will also prohibit the use of county funds to construct multifamily multi-story townhomes that are not at least “visitable.”

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Recommendation 4: Madison County will work with the Illinois Money Follows the Person program to ensure that Madison County residents are being given opportunities for transition to community based housing. Madison County will contact Jean Summerfield, Illinois Coordinator for the program, to request a speaker at the Community Collaborative meeting.

Recommendation 5: Madison County will work with landlords to promote the use of www.ilhousing.org which is free for landlords to advertise on, and which allows consumers to identify affordable, accessible housing. Madison County will promote the use of www.ilhousing.org by social service providers through the Community Collaborative and Continuum of Care.

Recommendation 6: Madison County will continue to target 10 vouchers with the Rental Housing Assistance Program for persons with disabilities or “special needs” population and will continue to work with transitional housing providers to ensure that persons with mental illnesses have community-based housing opportunities.

Impediment #11

Persons with Limited English Proficiency Have Difficulty Accessing Services

A high proportion of the Hispanic population in Madison County speaks Spanish at home, demonstrating that some may feel more comfortable communicating in Spanish and others may have limited English proficiency. This makes it difficult for Hispanics to access community services and programs of Madison County.

Goal: Equal Access for Limited English Proficient Residents

Recommendation: Madison County will hire a Limited English Proficiency (LEP) Coordinator who will be bilingual (at least) in Spanish / English, and who will be in charge of ensuring that LEP persons have equal access to all Madison County programs. The LEP Coordinator will work closely with the Latino Roundtable to assess needs of the Hispanic community and to maximize outreach to this community. The LEP Coordinator will attend meetings of the proposed Madison County Council of School Districts, to ensure that schools have resources to serve LEP families equitably. The LEP Coordinator will serve all LEP populations, regardless of language of origin, with an understanding that the primary LEP population in Madison County speaks Spanish. The LEP Coordinator will ensure that persons with limited English proficiency are made aware of ESOL programs to assist them in learning English and being able to access mainstream opportunities.

Impediment #12**Sprawl Has Contributed to Racial Segregation**

The St. Louis metropolitan region has a tradition of urban sprawl, making our region one of the most spread out and low-density metropolitan areas of the country. This may be true for Madison County to a lesser extent than for other counties in the region, which provides Madison County with an opportunity to change its policies to promote healthier communities. Sprawl has contributed to increased transportation costs, a lack of green space and farmland, and development incentives which subsidize exurban or suburban communities at the expense of urban areas or inner ring suburbs. These practices have often been fueled by patterns of racial segregation, and have contributed to racial segregation. In the end, there is an environmental impact on our communities as well as a decrease in livable, healthy and walkable neighborhoods.

Goal: Creating Sustainable Communities and Preserving Green Space

Recommendation 1: Madison County should conduct or retain a consultant to conduct a study to analyze the potential opportunities to creating growth boundaries and using zoning practices to retain green space and preserve undeveloped land.

Recommendation 2: Madison County should partner with St. Clair County, and perhaps other local jurisdictions to compete for funding under the Sustainable Communities Initiative (SCI), a new grant program of the Department of Housing and Urban Development.

Notes

- 1 For more information on the Westchester case, including Judge Cote's ruling and the settlement, see www.antibiaslaw.org.
- 2 Senator Edward Brooke: 114 Cong. Rec. 2281 [1968]
- 3 Sheryll Cashin discusses the creation of "winner" and "loser" communities in her book *The Failures of Integration: How Race and Class are Undermining the American Dream*, New York: Public Affairs, 2004.
- 4 42 USC 3601, The Fair Housing Act, Available at <http://www.justice.gov/crt/housing/title8.php>
- 5 Summaries and links to fair housing laws and executive orders are found at <http://www.hud.gov/offices/fheo/FHLaws/index.cfm>
- 6 775 ILCS 5, The Illinois Human Rights Act, Available at <http://www.ilga.gov/legislation/ilcs/ilcs5.asp?ActID=2266&ChapterID=64>
- 7 The Illinois Accessibility Code, Available at <http://www.cdb.state.il.us/forms/download/IAC/Web%20Version%20IAC.pdf>
- 8 Ord.5554, 6-12-1991, Alton Human Rights Ordinance as amended, Available at www.alton-il.com/codebook.cfm
- 9 Ord. 5489, 10-24-1990, Alton Human Rights Ordinance, Available at www.alton-il.com/codebook.cfm
- 10 Code 1996, Section 9.36, Collinsville Fair Housing Ordinance, Available on [municode.com](http://www.municode.com)
- 11 Section 58, Article III, Edwardsville Fair Housing Ordinance, Available on [municode.com](http://www.municode.com)
- 12 www.tricityport.com, last viewed 7/29/10
- 13 St. Louis Regional Chamber and Growth Association, <http://www.stlrcga.org/x400.xml>, last viewed 7/27/10
- 14 HUD Dataset FHEO Complaint Data 2007 - 2009
- 15 Massey, Douglas S. and Nancy A. Denton, *American Apartheid: Segregation and the Making of the Underclass*, Harvard University Press: Cambridge, 1993, pp. 74 – 76.
- 16 John E. Farley, PhD, "Racial Housing Segregation in the St. Louis Metropolitan Area, 1990," presented at the 1991 Annual Meetings of the Illinois Sociological Association, Evanston, Illinois, October 18, 1991, , p. 7.
- 17 Ibid., p. 12.
- 18 www.impactcill.org
- 19 www.madisoncounty.nami.org
- 20 www.chestnut.org
- 21 www.mcmhb.org
- 22 Association of Religion Data Archives, http://www.thearda.com/mapsReports/reports/counties/17119_2000.asp.
- 23 SOCDS Building Permits Database, HUD, available at [socds.huduser.org/permits/index.html?](http://socds.huduser.org/permits/index.html)
- 24 Schmidt, Sanford J. "Subdivision Residents Sue City Over Student Housing Plans," Alton Telegraph, June 6, 2008, <http://www.thetelegraph.com/news/edwardsville-14868-housing-city.html>.
- 25 Email from Dorothy Hummel of the Madison County Housing Authority, September 10, 2010.
- 26 Hummel, 9/10/10.
- 27 Hummel, 9/10/10.
- 28 Conversation between Walter Hunter of Madison County Community Development and John Hamm of the Madison County Housing Authority, September 23, 2010.
- 29 HUD, Affordable Apartment Search, <http://www.hud.gov/apps/section8/index.cfm>
- 30 All school data comes from Illinois Interactive Report Card, located at <http://iirc.niu.edu/> by the Illinois State Board of Education, 2010.
- 31 David Rusk, "Building Sustainable, Inclusive Communities," Published by Poverty & Race Research Action Council and Building One America, May 2010, p. 21, available at <http://www.prrac.org/pdf/SustainableInclusiveCommunities.pdf>
- 32 Madison County Transit website, http://www.mct.org/MCTInfo/MCT_Overview.aspx.
- 33 Schmidt, Sanford J. "County Works to Find New Homes for Residents," Alton Telegraph, 11/21/2008.
- 34 Metropolitan St. Louis Equal Housing Opportunity Council, "Building Inclusive Communities: A Report on Housing Discrimination in Metropolitan St. Louis in 2003," April 12, 2004, pp. 11 – 12.
- 35 Metropolitan St. Louis Equal Housing Opportunity Council, "Housing Discrimination Complaints in 2005 in the St. Louis Metropolitan Area," 2006.
- 36 Data from First American CoreLogic, December 2009.
- 37 Conversation with Madison County Community Development Staff, September 8, 2010.
- 38 Loewen, James. *Sundown Towns: A Hidden Dimension of American Racism*, Touchstone (Simon & Schuster): New York, 2006, p. 4.

Notes

- 39 Loewen, James, "Possible Sundown Towns in Illinois" website available at <http://sundown.afro.illinois.edu/sundowntownsshow.php?state=IL>, last viewed 7/29/10
- 40 Ibid.
- 41 From Sundown Towns website on East Alton, available at <http://sundown.afro.illinois.edu/sundowntownsshow.php?id=1606>, last viewed 7/29/10.
- 42 Conversation with Walter Hunter, Madison County Community Development, November 4, 2010.
- 43 Email correspondence from Karon Wolfe, Madison County Community Development, November 4, 2010.
- 44 From Population Files for Towns in Selected States: Illinois Dataset, downloaded from http://sundown.afro.illinois.edu/population_files/90censuY.xls.
- 45 Conversation with Madison County Community Development staff, September 8, 2010.
- 46 From Sundown Towns website on Granite City, Email comment from 1/2008, available at <http://sundown.afro.illinois.edu/sundowntownsshow.php?id=1603>, last viewed 7/29/10.
- 47 The full comments on the survey are not published in this study but are available from the Metropolitan St. Louis Equal Housing Opportunity Council. Survey participants were asked whether they had experienced or witnessed discrimination and what they had done about it.
- 48 See study http://cms.tc.columbia.edu/i/a/782_ASWells041504.pdf.
- 49 More information about the Inclusive Communities Partnership of the National League of Cities can be found at http://nlcws.nlc.org/resources_for_cities/programs__services/7952.aspx
- 50 David Rusk has used the phrase "Housing Policy Is School Policy" regularly in his writings, for instance, <http://www.gamaliel.org/davidrusk/abell%202%20school%20final%20report.pdf>