City of Moline
619 16 Street, Moline – 2nd Floor
Council Chambers

Committee-of-the-Whole Agenda

6:30 p.m.

Tuesday, October 2, 2012

Informational

Review of the 2012 ***Davenport – Moline – Rock Island Analysis of Impediments to Fair Housing Choice*** document. (Jeff Anderson, City Planner)

Questions on the Agenda

Agenda Items

1. **Adoption of the Analysis of Impediments to Fair Housing Choice per U.S. Department of Housing and Urban Development (HUD) program requirements** (Jeff Anderson, City Planner)

2. **Request from Madison Construction, Inc. for a Licensing Agreement to allow development-related work on city-owned property at 2500 and 2600 River Drive** (Chris Mathias, Property Management Coordinator)

3. **Declaration of property located at 1714 8 Avenue as surplus property and authorizing the Finance Director to dispose of said surplus property** (Chris Mathias, Property Management Coordinator)

4. **17th Avenue Elevated Storage Tank Rehabilitation Project** (Greg Swanson, Utilities General Manager)

5. **Approval of Change Order #1 with Langman Construction for Project #1145, 2012 Sealcoat Upgrade** (Scott Hinton, City Engineer)

6. **Approval of Change Order #1 with Midwest Mudjacking, Inc. for Project #1156, 2012 Mudjacking Project** (Scott Hinton, City Engineer)

7. **Approval of Change Order #1 with Legacy Corporation for Project #1158, 12th Avenue Retaining Wall Replacement** (Scott Hinton, City Engineer)

8. **Approval of Change Order #1 with Langman Construction for MFT Section 12-00252-00-RP, 16th Street Reconstruction, 12th – 18th Avenues** (Scott Hinton, City Engineer)

9. **Approval of Change Order #2 with Valley Construction for MFT Section 08-00239-00-RP, RiverTech Boulevard** (Scott Hinton, City Engineer)

10. **Other**

Explanation

1. **Adoption of the Analysis of Impediments to Fair Housing Choice per U.S. Department of Housing and Urban Development (HUD) program requirements** (Jeff Anderson, City Planner)

Explanation: Federal rules and requirements pertaining to the Fair Housing Act require CDBG entitlement communities, such as Moline, to periodically prepare and adopt an Analysis of Impediments to Fair Housing Choice document. The City of Moline has prepared such a document in conjunction with the Cities of Rock Island, Illinois and Davenport, Iowa. The main purpose of the study and related document is to identify local impediments to fair housing choice and to provide recommended actions to eliminate said impediments. Additional documentation attached.

Staff Recommendation: Adopt the Analysis of Impediments to Fair Housing Choice
Fiscal Impact: N/A
Public Notice/Recording: N/A
Goal Impacted: Desirable Place to Live

2. **Request from Madison Construction, Inc. for a Licensing Agreement to allow development-related work on City-owned property at 2500 and 2600 River Drive** (Chris Mathias, Property Management Coordinator)

Explanation: Madison Construction, Inc. was selected as the preferred developer for the former Hendricks Property. The developer would like to get started with due diligence work related to development of the property, prior to a development agreement. Execution of a licensing agreement would allow the developer to install signage, setup a temporary construction trailer, and conduct soil boring tests. Additional documentation attached.

Staff Recommendation: Approval
Fiscal Impact: No fiscal impact to City.
Public Notice/Recording: N/A
Goals Impacted: Quality Neighborhoods & Vibrant Downtown; Strong Local Economy

3. **Declaration of property located at 1714 8 Avenue as surplus property and authorizing the Finance Director to dispose of said surplus property** (Chris Mathias, Property Management Coordinator)

Explanation: The City acquired the property at 1714 8th Avenue in lieu of foreclosing on a judgment lien for code violations. The property contained a dilapidated residential structure that was barely visible to the public eye due to being overgrown with vegetation. The City's Neighborhood Stabilization Program 2 demolished the residential structure in 2011. The lot size does not meet the City's standard dimension for reuse (rebuilding) and is of no value to the City.

Staff Recommendation: Approve
Fiscal Impact: N/A
Public Notice/Recording: N/A
Goals Impacted: Financially Strong City; Desirable Place to Live

4. **17th Avenue Elevated Storage Tank Rehabilitation Project** (Greg Swanson, Utilities General Manager)

Explanation: Moline's 750,000 gallon elevated water storage tank, which is located at 1531-17th Avenue, was originally erected in 1982. This welded steel tank requires major rehabilitation at this time to address a number of deficiencies and ensure its continued safe and reliable operation. The rehabilitation project, which will significantly extend the life of the tank, includes the following primary items of work:

- Complete cleaning and repainting of the interior and exterior
- Various repairs and safety upgrades to enhance reliability and achieve OSHA compliance
- Installation of a submersible mixer

The City advertised and received three sealed bids for the rehabilitation project:

George Kountoupes Painting Company	$599,700.00
TMI Coatings	$896,000.00
Classic Protective Coatings, Inc.	$1,002,050.00

The low bidder previously completed the City's 42nd Street Tank rehabilitation project in 2008 and is capable of performing the work included in the current project. If approved, the 17th Avenue tank rehabilitation work will get underway on or about April 1, 2013. Additional documentation attached.

Staff Recommendation: Staff recommends awarding the bid to the low bidder, George Kountoupes Painting Company, in the amount of $599,700.00.
Fiscal Impact: $700,000.00 is budgeted for this project in 310-1718-434.08-45.
Public Notice/Recording: N/A
Goals Impacted: Improved City Infrastructure & Facilities

5. **Approval of Change Order #1 with Langman Construction for Project #1145, 2012 Sealcoat Upgrade** (Scott Hinton, City Engineer)

Explanation: In order to make final payment to the contractor and close out the contract, a reconciliation change order is needed in the amount of $25,465.51. The change order reflects the difference between the estimated bid quantities and final quantities actually constructed. The change order increases the original contract value of $419,810.00 by 6.1% to $445,275.51.

Staff Recommendation: Staff recommends approval of the change order.
Fiscal Impact: Funds are budgeted and available as detailed below.

ACCOUNT	BUDGETED	ORIGINAL CONTRACT	CHANGE ORDERS	TOTAL
UTILITY TAX	445,000.00	377,045.00	29,868.10	406,913.10
WATER	2,000.00		3,008.50	3,008.50
WPC				0.00
STORM	53,500.00	42,765.00	(7,411.09)	35,353.91
	500,500.00	419,810.00	25,465.51	445,275.51

Public Notice/Recording: N/A
Goals Impacted: Improved City Infrastructure & Facilities

6. **Approval of Change Order #1 with Midwest Mudjacking, Inc. for Project #1156, 2012 Mudjacking Project** (Scott Hinton, City Engineer)

Explanation: In order to make final payment to the contractor and close out the contract, a reconciliation change order is needed in the amount of $31,200.00. The change order reflects the difference between the estimated bid quantities and final quantities actually constructed. The change order increases the original contract value of $15,000.00 by 208% to $46,200.

Staff Recommendation: Staff recommends approval of the change order.
Fiscal Impact: Funds are budgeted and available as detailed below.

ACCOUNT	BUDGETED	ORIGINAL CONTRACT	CHANGE ORDERS	TOTAL
UTILITY TAX	50,000.00	15,000.00	31,200.00	46,200.00
WATER				

WPC STORM				
	50,000.00	15,000.00	31,200.00	46,200.00

Public Notice/Recording: N/A
Goals Impacted: Improved City Infrastructure & Facilities

7. **Approval of Change Order #1 with Legacy Corporation for Project #1158, 12th Avenue Retaining Wall Replacement** (Scott Hinton, City Engineer)

Explanation: In order to make final payment to the contractor and close out the contract, a reconciliation change order is needed in the amount of $3,406.50. The change order reflects the difference between the estimated bid quantities and final quantities actually constructed. The change order increases the original contract value of $49,880.00 by 6.8% to $53,286.50.

Staff Recommendation: Staff recommends approval of the change order.
Fiscal Impact: Funds are budgeted and available as detailed below.

ACCOUNT	BUDGETED	ORIGINAL CONTRACT	ADDITIONAL WORK	TOTAL
Utility Tax Water WPC Storm	50,000.00	49,880.00	3,406.50	53,286.50
	50,000.00	49,880.00	3,406.50	53,286.50

Public Notice/Recording: N/A
Goals Impacted: Improved City Infrastructure & Facilities

8. **Approval of Change Order #1 with Langman Construction for MFT Section 12-00252-00-RP, 16th Street Reconstruction, 12th – 18th Avenues** (Scott Hinton, City Engineer)

Explanation: In order to make final payment to the contractor and close out the contract, a reconciliation change order is needed in the amount of $61,976.60. The change order reflects the difference between the estimated bid quantities and final quantities actually constructed. The change order increases the original contract value of $548,377.61 by 11.3% to $610,354.21. The majority of the additional work is related to pavement repairs resulting from Project #1157, 16th Street Watermain Replacement and at the side streets to ensure adequate stormwater drainage.

Staff Recommendation: Staff recommends approval of the change order.
Fiscal Impact: Funds are budgeted and available as detailed below.

ACCOUNT	BUDGETED	ORIGINAL CONTRACT	CHANGE ORDERS	TOTAL
MFT	525,000.00	545,877.50	57,573.29	603,450.79
WATER	4,000.00	1,500.11	3,433.31	4,933.42
WPC	1,000.00	1,000.00	970.00	1,970.00
STORM				0.00
	530,000.00	548,377.61	61,976.60	610,354.21

Public Notice/Recording: N/A
Goals Impacted: Improved City Infrastructure & Facilities

9. **Approval of Change Order #2 with Valley Construction for MFT Section 08-00239-00-RP, RiverTech Boulevard** (Scott Hinton, City Engineer)

Explanation: RiverTech Boulevard (University Drive) was designed to accommodate METRO buses in anticipation of Western Illinois University students using METRO for transportation to and from the new campus. The original street design included a bus turnout lane to provide safe access to the buses. While the Illinois Department of Transportation was not opposed to the turnout lane, they would not allow its inclusion in the contract without first reviewing and approving its' impact on the WIU campus. The WIU campus plans were not far enough along to provide details to IDOT in time for the turnout lane to be included in the bid package. As such, it was not included in the contract. WIU's plans have now been completed and IDOT has approved the installation of the turnout lane. Valley Construction proposes to install the turnout lane for approximately $27,540.00. The City's portion of this additional cost is $5,508.00. This is an estimated cost based on plan quantities for established contract unit prices. The final cost will reflect actual quantities installed, and the City Engineer will return to Council for final approval after the installation is complete.

Staff Recommendation: Staff recommends approval of the change order with Valley Construction.
Fiscal Impact: Funds are budgeted and available as detailed below:

Account	Budgeted	Original Contract	Change Order #2	Total Change Orders	Total
MFT (20%)	240,000.00	159,462.45	5,508.00	29,707.02	189,169.47
Federal Grant (80%)	1,176,000.00	637,849.80	22,032.00	118,828.06	756,677.86
	1,416,000.00	797,312.25	27,540.00	148,535.08	945,847.33

Public Notice/Recording: N/A
Goals Impacted: Improved City Infrastructure & Facilities

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

DAVENPORT, IA
MOLINE, IL
ROCK ISLAND, IL

REVISED EDITION
JULY 2012

MULLIN & LONERGAN ASSOCIATES

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

DRAFT EDITION

Davenport, IA ♦ Moline, IL ♦ Rock Island, IL

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1. Introduction

A. Introduction to the Analysis of Impediments

The cities of Davenport, Iowa; Moline, Illinois; and Rock Island, Illinois have prepared an Analysis of Impediments to Fair Housing Choice (AI) to satisfy requirements of the Housing and Community Development Act of 1974, as amended. This act requires that any community receiving Community Development Block Grant (CDBG) funds affirmatively further fair housing. Each of the three cities receives an annual allocation of CDBG funds from the U.S. Department of Housing and urban Development (HUD). Davenport also receives federal HOME Investment Partnership (HOME) Program funds. As federal CDBG entitlement communities, the three cities are charged with the responsibility of conducting their federal entitlement programs in compliance with the federal Fair Housing Act. The responsibility of compliance with the federal Fair Housing Act extends to nonprofit organizations and other entities that receive federal CDBG funds through the three cities.

Communities receiving CDBG entitlement funds are required to:

- Examine and attempt to alleviate housing discrimination within their jurisdiction
- Promote fair housing choice for all persons
- Provide opportunities for all persons to reside in any given housing development, regardless of race, color, religion, sex, disability, familial status, or national origin, i.e., the protected classes
- Promote housing that is accessible to and usable by persons with disabilities, and
- Comply with the non-discrimination requirements of the Fair Housing Act.

These requirements can be achieved through the preparation of an Analysis of Impediments to Fair Housing Choice (AI). The AI is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability, and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice.

B. Fair Housing Choice

Equal and free access to residential housing (housing choice) is a fundamental right that enables members of the protected classes to pursue personal, educational, employment or other goals. Because housing choice is so critical to personal development, fair housing is a goal that government, public officials, and private citizens must embrace if equality of opportunity is to become a reality.

Under federal law, fair housing choice is defined as the ability of persons of similar income level, regardless of race, color, religion, sex, disability, familial status, or national origin, to have available to them the same housing choices. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This Analysis encompasses the following five areas related to fair housing choice:

- The sale or rental of dwellings (public and private),
- The provision of financing assistance for dwellings,
- Public policies and actions affecting the approval of sites and other building requirements used in the approval process for the construction of publicly assisted housing,

- The administrative policies concerning community development and housing activities, which affect opportunities of minority households to select housing inside or outside impacted areas, and
- Where there is a determination of unlawful segregation or other housing discrimination by a court or a finding of noncompliance by the U.S. Department of Housing and Urban Development (HUD) regarding assisted housing in a recipient's jurisdiction, an analysis of the actions which could be taken by the recipient to remedy the discriminatory condition, including actions involving the expenditure of funds made available under 24 CFR Part 570 (i.e., the CDBG program regulations) and/or 24 CFR Part 92 (i.e., the HOME program regulations).

As federal entitlement communities, Davenport, Moline and Rock Island have specific fair housing planning responsibilities. These include:

- Conducting an Analysis of Impediments to Fair Housing Choice,
- Developing actions to overcome the effects of identified impediments to fair housing, and
- Maintaining records to support the communities' initiatives to affirmatively further fair housing.

HUD interprets these three certifying elements to include:

- Analyzing housing discrimination and working toward its elimination,
- Promoting fair housing choice for all people,
- Providing racially and ethnically inclusive patterns of housing occupancy,
- Promoting housing that is physically accessible to, and usable by, all people, particularly individuals with disabilities, and
- Fostering compliance with the nondiscrimination provisions of the Fair Housing Act.

This Analysis will:

- Evaluate population, household, income, and housing characteristics by protected classes in the cities,
- Evaluate public and private sector policies that impact fair housing choice,
- Identify blatant or de facto impediments to fair housing choice, where any may exist, and
- Recommend specific strategies to overcome the effects of any identified impediments.

HUD defines an impediment to fair housing choice as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices, based on race, color, religion, sex, disability, familial status or national origin, and (per March 5, 2012 HUD Final Rule) sexual orientation, gender identity or marital status. (See "Recent Changes to HUD Program Regulation" on p. 16).

This Analysis serves as the basis for fair housing planning, provides essential information to policy makers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts. The elected governmental bodies of the three cities are expected to review and approve the Analysis and use it for direction, leadership, and resources for future fair housing planning.

The Analysis will serve as a "point-in-time" baseline against which future progress in terms of implementing fair housing initiatives will be judged and recorded.

C. Obligation of Entitlement Communities to Affirmatively Further Fair Housing

In August 2009, Westchester County, NY settled a fair housing lawsuit brought against the County by the Anti-Discrimination Center of Metro New York, Inc. The outcome of this lawsuit is relevant to all HUD Urban County and State entitlements, but it also has implications for entitlement cities like Davenport, Moline and Rock Island.

This $180 million lawsuit filed in April 2006 charged that Westchester County failed to fulfill its obligation to affirmatively further fair housing and ensure non-discrimination in its programs. Westchester County is an Urban County entitlement under HUD's CDBG and HOME Programs. As a condition of federal funding, all such HUD entitlements certify to HUD each year that they will conduct their entitlement programs in a non-discriminatory manner that affirmatively furthers fair housing in accordance with the Civil Rights Act of 1964 and the federal Fair Housing Act. In making this certification, Westchester County was required to identify impediments to fair housing choice, take action to overcome those impediments, and to maintain records of its analysis and actions.

In the lawsuit, the Center charged that:

- Westchester County is a racially segregated county
- Westchester County's Analysis of Impediments to Fair Housing Choice (AI) was flawed because it considered housing needs based solely on income and failed to fully consider racial segregation and housing needs based on race
- Westchester County failed to inform municipalities receiving CDBG funds of their own obligation to consider the housing needs of persons living outside the communities, not just the needs of residents living within their municipal limits
- Westchester County failed to require municipalities receiving CDBG funds to increase the availability of affordable housing or otherwise affirmatively further fair housing
- As a result of the above, Westchester County made a false claim when it certified to HUD that the County would affirmatively further fair housing.

At issue in this case was not whether Westchester County created affordable housing. In fact, since 1998, the County spent over $50 million in federal and state funds to aid in the construction of 1,370 affordable rental units and another 334 affordable owner units. It was the geographic location of the affordable housing units that were created within the County that was the critical factor in the lawsuit.

The Center alleged that the County's AI did not analyze how its placement of affordable housing affected segregation and racial diversity. It concluded that the County assisted the development of affordable housing units in lower income communities and that as a result, it increased the pattern of racial segregation in Westchester County. Furthermore, the suit charged that the County violated its cooperation agreements with local units of government which prohibits expenditures of CDBG funds for activities in communities that do not affirmatively further fair housing within their jurisdiction or otherwise impede the County's action to comply with its fair housing certifications.

Faced with the threat of losing the $180 million lawsuit and being cut off from another $30 million in HUD funding, Westchester County agreed to a settlement with HUD and the Anti-Discrimination Center of Metro New York. Under the terms of the settlement, the County will pay $21.6 million to HUD in non-federal funds. These funds will be deposited in the County's HUD account and used to build new affordable housing units in specified census tracts with populations of less than 3% Black and 7% Hispanic residents. An additional $11 million will be paid to HUD, the Center and its counsel. The County will add $30 million to its capital budget to build affordable housing in non-impacted (i.e., primarily White) areas. It is anticipated that the County will issue bonds to meet its financial obligations under the settlement.

The significance of this legal settlement for entitlements throughout the U.S. is clear. The lawsuit confirms that an entitlement has an obligation to ensure that subrecipients, including local units of government, affirmatively further fair housing. When an entitlement makes this pledge to HUD, it is making the promise not just in its own right but also on behalf of all subrecipients.

D. The Federal Fair Housing Act

1. What housing is covered?

The federal Fair Housing Act covers most housing. In some circumstances, the Act exempts owner-occupied buildings with no more than four units, single family housing sold or rented without the use of a broker, and housing operated by organizations and private clubs that limit occupancy to members.

2. What does the Fair Housing Act prohibit?

a. In the Sale and Rental of Housing

No one may take any of the following actions based on race, color, religion, sex, disability, familial status, or national origin:

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

b. In Mortgage Lending

No one may take any of the following actions based on race, color, religion, sex, disability, familial status, or national origin:

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

c. Other Prohibitions

It is illegal for anyone to:

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

3. Additional Protections for People with Disabilities

If someone has a physical or mental disability (including hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex and developmental delay) that substantially limits one or more major life activities, or has a record of such a disability, or is regarded as having such a disability, a landlord may not:

- Refuse to let the disabled person make reasonable modifications to a dwelling or common use areas, at the disabled person's expense, if necessary for the disabled person to use the housing. Where reasonable, the landlord may permit changes only if the disabled person agrees to restore the property to its original condition when he or she moves.
- Refuse to make reasonable accommodations in rules, policies, practices, or services if necessary for the disabled person to use the housing.

For example, a building with a "no pets" policy must make a reasonable accommodation and allow a visually impaired tenant to keep a guide dog or a tenant with a mental disability to keep an emotional support animal.

4. Housing Opportunities for Families with Children

Unless a building or community qualifies as housing for older persons, it may not discriminate based on familial status. That is, it may not discriminate against families in which one or more children under the age 18 live with:

- A parent, or
- A person who has legal custody of the child or children, or
- The designee of the parent or legal custodian, with the parent or custodian's written permission.

Familial status protection also applies to pregnant women and anyone securing legal custody of a child under age 18.

Housing for older persons is exempt from the prohibition against familial status discrimination if:

- The HUD Secretary has determined that it is specifically designed for and occupied by elderly persons under a federal, state or local government program, or
- It is occupied solely by persons who are 62 or older, or
- It houses at least one person who is 55 or older in at least 80% of the occupied units, and adheres to a policy that demonstrates the intent to house persons who are 55 or older, as previously described.

A transition period permits residents on or before September 13, 1988 to continue living in the housing, regardless of their age, without interfering with the exemption.

5. Recent Changes to HUD Program Regulation

As of a Final Rule effective March 5, 2012, HUD implemented a policy with the intention of ensuring that its core programs are open to all eligible individuals and families regardless of sexual orientation, gender identity or marital status. In response to evidence suggesting that lesbian, gay, bisexual and transgender individuals and families were being arbitrarily excluded from housing opportunities in the private sector, HUD's aim was to ensure that its own programs do not allow for discrimination against any eligible person or household, and that HUD's own programs serve as models for equal housing opportunity.

This change to HUD program regulations does not amend the Fair Housing Act to prohibit all discrimination in the private market on the basis of sexual orientation, gender identity or marital status. However, it prohibits discrimination of those types by any housing provider who receives HUD funding, including public housing agencies, those who are insured by the Federal Housing Administration, including lenders, and those who participate in federal entitlement grant programs through HUD.

E. State and Local Fair Housing Laws

Illinois and Iowa fair housing laws prohibit housing discrimination on bases in addition to the seven protected classes specified under the federal fair housing law. In Illinois, the additional protected classes include ancestry, sexual orientation, unfavorable discharge from military service, marital status, age, military status, and order of protection status. In Iowa, additional protected classes include sexual orientation, gender identity and creed. Also in Iowa, an additional protected class is retaliation against anyone for having filed a charge, complained about discrimination or participated in an investigation or court proceedings involving discrimination. In the City of Davenport, supra-federal protected classes include age, creed, marital status, gender identity or sexual orientation. As a result, residents of Davenport, Moline and Rock Island have additional protection under state and local fair housing laws beyond the protections afforded under the federal Fair Housing Act.

The following chart depicts the protected classes of the various fair housing statutes for residents of Davenport, Moline and Rock Island.

Figure 1-1
Comparison of Statutory Protections from Housing Discrimination

Protected Class	Federal Fair Housing Act	Illinois Human Rights Act	Iowa Civil Rights Act	Davenport Civil Rights Ordinance
Race	•	•	•	•
Color	•	•	•	•
National Origin	•	•	•	•
Religion	•	•	•	•
Sex	•	•	•	•
Familial Status (families with children under age 18)	•	•	•	•
Handicap/Disability Status	•	•	•	•
Marital Status	*	•		•
Age		•		•
Sexual Orientation	*	•	•	•
Gender Identity	*	•	•	•
Ancestry		•		•
Unfavorable Discharge from Military Service		•		
Military Status		•		
Order of Protection Status		•		
Retaliation for Pursuing Discrimination Charge		•	•	•
Creed			•	•

* See "Recent Changes to HUD Program Regulation," p. 16

1. Illinois Human Rights Act

The Illinois Department of Human Rights (IDHR) enforces the Illinois Human Rights Act. Under this Act it is a civil rights violation for an owner or any other person engaging in a real estate transaction, or for a real estate broker or salesman, because of unlawful discrimination or familial status, to:

1. Refuse to engage in a real estate transaction with a person or to discriminate in making available such a transaction;
2. Alter the terms, conditions or privileges of a real estate transaction or in the furnishing of facilities or services in connection therewith;
3. Refuse to receive or to fail to transmit a bona fide offer to engage in a real estate transaction from a person;
4. Refuse to negotiate for a real estate transaction with a person;
5. Represent to a person that real property is not available for inspection, sale, rental, or lease when in fact it is so available, or to fail to bring a property listing to his or her attention, or to refuse to permit him or her to inspect real property;
6. Print, circulate, post, mail, publish or cause to be so published a written or oral statement, advertisement or sign, or to use a form of application for a real estate transaction, or to make a record or inquiry in connection with a prospective real estate transaction, which expresses any limitation founded upon, or indicates, directly or indirectly, an intent to engage in unlawful discrimination;
7. Offer, solicit, accept, use or retain a listing of real property with knowledge that unlawful discrimination or discrimination on the basis of familial status in a real estate transaction is intended;

8. Refuse to sell or rent or to otherwise make unavailable or deny a dwelling to any buyer or renter because of a disability of that buyer or renter, a disability of a person residing or intending to reside in that dwelling after it is sold, rented or made available or a disability of any person associated with the buyer or renter;
9. Alter the terms, conditions or privileges of sale or rental of a dwelling or the provision of services or facilities in connection with such dwelling because of a disability of a person with a disability or a disability of any person residing or intending to reside in that dwelling after it is sold, rented or made available, or a disability of any person associated with that person;
10. Refuse to permit, at the expense of the person with a disability, reasonable modifications of existing premises occupied or to be occupied by such person if such modifications may be necessary to afford such person full enjoyment of the premises; except that, in the case of a rental, the landlord may, where it is reasonable to do so, condition permission for a modification on the renter agreeing to restore the interior of the premises to the condition that existed before modifications, reasonable wear and tear excepted. The landlord may not increase for persons with a disability any customarily required security deposit. However, where it is necessary in order to ensure with reasonable certainty that funds will be available to pay for the restorations at the end of the tenancy, the landlord may negotiate as part of such a restoration agreement a provision requiring that the tenant pay into an interest bearing escrow account, over a reasonable period, a reasonable amount of money not to exceed the cost of the restorations. The interest in any such account shall accrue to the benefit of the tenant. A landlord may condition permission for a modification on the renter providing a reasonable description of the proposed modifications as well as reasonable assurances that the work will be done in a workmanlike manner and that any required building permits will be obtained;
11. Refuse to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling;
12. In connection with the design and construction of covered multifamily dwellings for first occupancy after March 13, 1991, to fail to design and construct those dwellings in such a manner that:
    a. The public use and common use portions of such dwellings are readily accessible to and usable by persons with a disability;
    b. All the doors designed to allow passage into and within all premises within such dwellings are sufficiently wide to allow passage by persons with a disability in wheelchairs; and
    c. All premises within such dwellings contain the following features of adaptive design:
        (1) An accessible route into and through the dwelling;
        (2) Light switches, electrical outlets thermostats, and other environmental controls in accessible locations;
        (3) Reinforcements in bathroom walls to allow later installation of grab bars; and

(4) Usable kitchens and bathrooms such that an individual in a wheelchair can maneuver about the space.

13. Solicit for sale, lease, listing or purchase any residential real estate within this State, on the grounds of loss of value due to the present or prospective entry into the vicinity of the property involved of any person or persons of any particular race, color, religion, national origin, ancestry, age, sex, sexual orientation, marital status, familial status or handicap;
14. Distribute or cause to be distributed, written material or statements designed to induce any owner of residential real estate in this State to sell or lease his or her property because of any present or prospective changes in the race, color, religion, national origin, ancestry, age, sex, sexual orientation, marital status, familial status or handicap of residents in the vicinity of the property involved;
15. Intentionally create alarm, among residents of any community, by transmitting communications in any manner, including a telephone call whether or not conversation thereby ensues, with a design to induce any owner of residential real estate in this state to sell or lease his or her property because of any present or prospective entry into the vicinity of the property involved of any person or persons of any particular race, color, religion, national origin, ancestry, age, sex, sexual orientation, marital status, familial status or handicap;
16. Refuse to sell or rent after the making of a bonafide offer, or to refuse to negotiate for the sale or rental of, or otherwise make unavailable or deny property to any blind, hearing impaired or physically disabled person because he has a guide, hearing or support dog;
17. Discriminate against any blind, hearing impaired or physically disabled person in the terms, conditions, or privileges of sale or rental property, or in the provision of services or facilities in connection therewith, because he has a guide, hearing or support dog;
18. Require, because a blind, hearing impaired or physically disabled person has a guide, hearing or support dog, an extra charge in a lease, rental agreement, or contract of purchase or sale, other than for actual damage done to the premises by the dog;
19. To coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, or on account of his or her having exercised or enjoyed, or on account of his or her having aided or encouraged any other person in the exercise or enjoyment of, any right granted or protected by this Article 3 of the Illinois Human Rights Act.

Also under the Illinois Human Rights Act, it is a civil rights violation for any financial institution, on the grounds of unlawful discrimination, to:

1. Deny any person any of the services normally offered by such an institution;
2. Provide any person with any service which is different from, or provided in a different manner than, that which is provided to other persons similarly situated;
3. Deny or vary the terms of a loan;
4. Deny or vary the terms of a loan on the basis that a specific parcel of real estate offered as security is located in a specific geographical area;

5. Deny or vary the terms of a loan without having considered all of the regular and dependable income of each person who would be liable for repayment of the loan;
6. Utilize lending standards that have no economic basis and which constitute unlawful discrimination.

The Illinois Human Rights Act has been determined by HUD to be substantially equivalent to the federal Fair Housing Act. As such, the Illinois Human Rights Act provides substantive rights, procedures, remedies, and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. As a result, HUD will refer complaints of housing discrimination that it receives from Illinois to the Illinois Department of Human Rights.

The Illinois Department of Human Rights (IDHR) investigates fair housing discrimination complaints. It conducts fact finding conferences and issues a report of each investigated charge to the Director of IDHR. Upon review of the report, the Director then determines whether there is substantial evidence that the alleged civil rights violation has been committed or is about to be committed.

If the Director determines that there is such substantial evidence, he or she immediately issues a complaint on behalf of the aggrieved party. Prior to the issuance of a complaint, the Department may engage in conciliation with respect to the complaint. When there is a failure to settle a complaint through conciliation, the Department files a written complaint with the Illinois Human Rights Commission.

The Commission conducts a hearing on the complaint. When all testimony has been taken, the hearing officer determines whether a civil rights violation has occurred. If so, the hearing officer makes findings of fact and files a recommended order for appropriate relief with the Illinois Human Rights Relations Commission. The Commission reviews the case and files its written order and decision within one year of the date a charge is filed with the Department.

2. Iowa Civil Rights Act

The Iowa Civil Rights Act of 1965 contains the following provisions:

1. It shall be an unfair or discriminatory practice for any person, owner, or person acting for an owner, of rights to housing or real property, with or without compensation, including but not limited to persons licensed as real estate brokers or salespersons, attorneys, auctioneers, agents or representatives by power of attorney or appointment, or any person acting under court order, deed of trust, or will:

a. To refuse to sell, rent, lease, assign, sublease, refuse to negotiate, or to otherwise make unavailable, or deny any real property or housing accommodation or part, portion, or interest therein, to any person because of the race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status of such person;

b. To discriminate against any person because of the person's race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status, in the terms, conditions, or privileges of the sale, rental, lease

assignment, or sublease of any real property or housing accommodation or any part, portion, or interest in the real property or housing accommodation or in the provision of services or facilities in connection with the real property or housing accommodation;

c. To directly or indirectly advertise, or in any other manner indicate or publicize that the purchase, rental, lease, assignment, or sublease of any real property or housing accommodation or any part, portion, or interest therein, by persons of any particular race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status is unwelcome, objectionable, not acceptable, or not solicited;

d. To discriminate against the lessee or purchaser of any real property or housing accommodation or part, portion, or interest of the real property or housing accommodation, or against any prospective lessee or purchaser of the property or accommodation, because of the race, color, creed, religion, sex, sexual orientation, gender identity, disability, age, or national origin of persons who may from time to time be present in or on the lessee's or owner's premises for lawful purposes at the invitation of the lessee or owner as friends, guests, visitors, relatives, or in any similar capacity.

2. A person shall not induce or attempt to induce another person to sell or rent a dwelling by representations regarding the entry or prospective entry into a neighborhood of a person of a particular race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status.

3. A person shall not represent to a person of a particular race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status that a dwelling is not available for inspection, sale, or rental when the dwelling is available for inspection, sale, or rental.

4.

a. A person shall not discriminate in the sale or rental or otherwise make unavailable or deny a dwelling to a buyer or renter because of a disability of any of the following persons:

(1) That buyer or renter;

(2) A person residing in or intending to reside in that dwelling after it is sold, rented, or made available;

(3) A person associated with that buyer or renter.

b. A person shall not discriminate against another person in the terms, conditions, or privileges of sale or rental of a dwelling or in the provision of services or facilities in connection with the dwelling because of a disability of any of the following persons:

(1) That person;

(2) A person residing in or intending to reside in that dwelling after it is sold, rented, or made available;

(3) A person associated with that person.

c. For the purposes of this subsection only, discrimination includes any of the following circumstances:

(1) A refusal to permit, at the expense of the person with a disability, reasonable modifications of existing premises occupied or to be occupied by the person if the modifications are necessary to afford the person full enjoyment of the premises. However, it is not discrimination for a landlord, in the case of a rental and where reasonable to do so, to condition permission for a modification on the renter's agreement to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear accepted;

(2) A refusal to make reasonable accommodations in rules, policies, practices, or services, when the accommodations are necessary to afford the person equal opportunity to use and enjoy a dwelling;

(3) In connection with the design and construction of covered multifamily dwellings for first occupancy after January 1, 1992, a failure to design and construct those dwellings in a manner that meets the following requirements:

(a) The public use and common use portions of the dwellings are readily accessible to and usable by persons with disabilities;

(b) All doors designed to allow passage into and within all premises within the dwellings are sufficiently wide to allow passage by persons with disabilities in wheelchairs;

(c) All premises within the dwellings contain the following features of adaptive design:

(i) An accessible route into and through the dwelling;

(ii) Light switches, electrical outlets, thermostats, and other environmental controls in accessible locations;

(iii) Reinforcements in bathroom walls to allow later installation of grab bars;

(iv) Usable kitchens and bathrooms so that a person in a wheelchair can maneuver about the space.

d. Compliance with the appropriate requirements of the American national standard for buildings and facilities providing accessibility and usability for persons with disabilities, commonly cited as "ANSI A 117.1", satisfies the requirements of paragraph "c", subparagraph (3), subparagraph division (c);

e. Nothing in this subsection requires that a dwelling be made available to a person whose tenancy would constitute a direct threat to the health or safety of other persons or whose tenancy would result in substantial physical damage to the property of others.

5.

a. A person whose business includes engaging in residential real estate related transactions shall not discriminate against a person in making a residential real estate related transaction available or in terms or conditions of a residential real estate related transaction because of race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status;

b. For the purpose of this subsection, "residential real estate related transaction" means any of the following:

(1) To make or purchase loans or provide other financial assistance to purchase, construct, improve, repair, or maintain a dwelling, or to secure residential real estate;

(2) To sell, broker, or appraise residential real estate.

6. A person shall not deny another person access to, or membership or participation in, a multiple-listing service, real estate brokers' organization or other service, organization, or facility relating to the business of selling or renting dwellings, or discriminate against a person in terms or conditions of access, membership, or participation in such organization because of race, color, creed, sex, sexual orientation, gender identity, religion, national origin, disability, or familial status.

The Iowa Civil Rights Act of 1965 has been determined by HUD to be substantially equivalent to the federal Fair Housing Act. As such, the Iowa Civil Rights Act of 1965 provides substantive rights, procedures, remedies, and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. As a result, HUD will refer complaints of housing discrimination that it receives from Iowa to the Iowa Civil Rights Commission.

The Iowa Civil Rights Commission (ICRC) is the state agency responsible for enforcing the Iowa Civil Rights Act of 1965. ICRC's mission is to end discrimination through effective enforcement of the Iowa Civil Rights Act of 1965. The Commission protects people from unlawful discrimination in housing, employment, credit, education, and public accommodations. ICRC fulfills its mission by enforcing laws, mediating disputes, and educating the public.

ICRC staff reviews housing discrimination complaints and other collected information from the parties involved in the complaints, and makes a decision as to whether further investigation is warranted. If a complaint warrants further investigation, the parties are offered an opportunity to resolve the complaint through a voluntary mediation process. If an agreement is not reached, the complaint will be put in line for investigation. Following an investigation, an administrative law judge reviews the collected information and decides whether there is probable cause (discrimination probably occurred) or no probable cause (discrimination probably did not occur). If the decision is no probable cause, the complaint is dismissed. If probable cause is found, the ICRC attempts to negotiate the best settlement for the complaint and the people of Iowa. If negotiation fails, a decision is made whether to proceed to public hearing, at which the ICRC makes a final decision whether discrimination occurred. If the ICRC determines the respondent violated the Iowa Civil Rights Act, the Commission will order appropriate "make whole" relief.

3. Davenport Civil Rights Ordinance

Division III of the Davenport Civil Rights Ordinance governs fair housing practices in Davenport. The provisions of this ordinance make it unlawful:

1. To refuse to sell or rent after the making of a bona fide offer, or to refuse to negotiate for the sale or rental of or otherwise make unavailable or deny, a dwelling to any person because of race, color, creed, religion, sex, national origin or ancestry, age, familial status, marital status, disability, gender identity, or sexual orientation;

2. To discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provisions of services or facilities in connection therewith, because of race, color, creed, religion, sex, national origin or ancestry, age, familial status, marital status, disability, gender identity, or sexual orientation;
3. To make, print or publish, or cause to be made, printed or published any notice, statement or advertisement, with respect to the sale or rental of a dwelling that indicates any preference, limitation, or discrimination based on race, color, creed, religion, sex, national origin or ancestry, age, familial status, marital status, disability, gender identity, or sexual orientation;
4. To represent to any person because of race, color, creed, religion, sex, national origin or ancestry, age, familial status, marital status, disability, gender identity, or sexual orientation that any dwelling is not available for inspection, sale or rental when such dwelling is in fact so available;
5. For profit, to induce or attempt to induce any person to sell or rent any dwelling by representations regarding the entry or prospective entry into the neighborhood of a person or disabled persons of a particular race, color, creed, religion, sex, national origin or ancestry, age, familial status, marital status, disability, gender identity, or sexual orientation;
6.
    a. To discriminate in the sale or rental or to otherwise make unavailable or deny, a dwelling to any buyer or renter because of a disability of:
        (1) That buyer or renter;
        (2) A person residing in or intending to reside in that dwelling after it is so sold, rented or made available; or
        (3) Any person associated with that buyer or renter.
    b. To discriminate against any person in the terms, conditions, or privileges of sale or rental of a dwelling, or in the provisions of services or facilities in connection with such dwelling, because of a disability of:
        (1) That person; or
        (2) A person residing in or intending to reside in that dwelling after it is so sold, rented or made available; or
        (3) Any person associated with that person.
7. To coerce, intimidate, threaten, or interfere with any person in the exercise or enjoyment of, or an account of such person having aided or encouraged any other person in the exercise or enjoyment of any fair housing right.

Discrimination includes:

1. A refusal to permit, at the expense of the disabled person, reasonable modifications of existing premises occupied or to be occupied by such person if such modifications may be necessary to afford such person full enjoyment of the premises, except that, in the case of a rental, the landlord may, where it is reasonable to do so, condition permission for a modification on the renter, agreeing to restore the interior of the premises to the condition that existed before the modification, reasonable wear and tear excepted;

2. A refusal to make reasonable accommodations in rules, policies, practices or services, when such accommodations may be necessary to afford such person equal opportunity to use and enjoy a dwelling; or
3. In connection with the design and construction of covered multifamily dwellings for first occupancy after March 13, 1991, a failure to design and construct those dwellings in compliance with federal and state accessibility codes.

It shall be unlawful for any person or other entity whose business includes engaging in residential real estate-related transactions to discriminate against any person in making available such a transaction, or in the terms or conditions of such a transaction, because of race, color, creed, religion, sex, national origin or ancestry, age, familial status, marital status, disability, gender identity, or sexual orientation.

The term "residential real estate-related transaction" means any of the following:

1. The making or purchasing of loans or providing other financial assistance;
2. The selling, brokering or appraising of residential real property.

It shall be unlawful to deny any person access to or membership or participation in any multiple-listing service, real estate brokers' organization or other service, organization or facility relating to the business of selling or renting dwellings, or to discriminate against such person in the terms or conditions of such access, membership or participation, on account of race, color, creed, religion, sex, national origin, age, familial status, marital status, disability, gender identity, or sexual orientation.

The fair housing provisions of the Davenport Civil Rights Ordinance have been determined by HUD to be substantially equivalent to the federal Fair Housing Act. As such, the Davenport Civil Rights Ordinance provides substantive rights, procedures, remedies, and judicial review provisions that are substantially equivalent to the federal Fair Housing Act. As a result, HUD will refer complaints of housing discrimination that it receives from Davenport to the Davenport Civil Rights Commission.

The Davenport Civil Rights Commission (DCRC) is the agency responsible for enforcing the Davenport Civil Rights ordinance. DCRC's mission is to secure for all Davenport residents freedom from discrimination because of race, color, religion, creed, sex, sexual orientation, gender identity, national origin or ancestry, age, mental or physical disability, marital status and familial status in the areas of employment, housing, public accommodation, education, and credit.

The Davenport Civil Rights Commission receives and responds to alleged fair housing violations. The Commission begins the investigation of alleged discriminatory housing practices within 30 days after receiving a complaint and completes such investigation within 100 days.

Beginning with the filing of a complaint, the Commission may engage in conciliation, and any agreement arising out of such conciliation between the respondent and the complainant is subject to approval by the Commission.

If the Commission finds that probable cause exists to believe that a discrimination housing or real estate practice has occurred or is about to occur, the Commission immediately issues a probable cause determination. When the Commission issues a probable cause determination, the Commission shall provide an opportunity for a hearing on the record before an administrative law judge. Alternatively, a complainant, a respondent or an aggrieved person may elect to pursue a civil action in district court in lieu of an administrative hearing. If a civil action is elected and the court finds that discriminatory

housing practice has occurred or is about to occur, the court may award actual and punitive damages, attorney fees, a penalty, and the court may also grant as relief as it deems appropriate, any permanent or temporary injunction, temporary restraining order or other order. If civil action is not elected, the matter will be heard before an administrative law judge. The administrative law judge makes findings of fact and conclusions of law within 60 days after the end of the hearing. If the administrative law judge finds that a respondent has engaged in or is about to engage in a discriminatory housing practice, such administrative law judge promptly issues an order for such relief as may be appropriate and may assess a civil penalty against the respondent in an amount not to exceed those established by the federal Fair Housing Act.

In the case of an order with respect to a discriminatory housing practice that occurred in the course of a business subject to licensing or regulation by a governmental agency, the Commission notifies the governmental agency and recommends appropriate disciplinary action including, where appropriate, the suspension or revocation of the license.

The Commission may petition the Iowa District Court in which any respondent resides or transacts business for the enforcement of the order of the administrative law judge and for appropriate temporary relief or restraining order.

The Commission cooperates with state and federal agencies charged with the administration and enforcement of state and federal fair housing laws and may enter into written agreements with such agencies to further efforts to enforce fair housing laws in Davenport.

F. Comparison of Accessibility Standards

There are several standards of accessibility that are referenced throughout the AI. These standards are listed below, along with a summary of the features within each category or a link to the detailed standards.

1. Fair Housing Act

In single-level buildings that are ready for first occupancy after March 13, 1991 and include four or more units:

- There must be an accessible entrance on an accessible route.
- Public and common areas must be accessible to persons with disabilities.
- Doors and hallways must be wide enough for wheelchairs.
- All ground floor units and all units in elevator buildings must have:
- An accessible route into and through the unit
- Accessible light switches, electrical outlets, thermostats and other environmental controls
- Reinforced bathroom walls to allow later installation of grab bars, and
- Kitchens and bathrooms that can be used by people in wheelchairs

If a building with four or more units has no elevator and will be ready for first occupancy after March 13, 1991, these standards apply to ground floor units. These requirements for new buildings do not replace any more stringent standards in state or local law.

HUD recognizes 10 "safe harbors" (codes and guidelines) for compliance with the Fair Housing Act's design and construction requirements. (See *www.fairhousingfirst.org/faq/safeharbors.html*.)

Both the Davenport Civil Rights Ordinance and the Iowa Civil Rights Act mirror the Fair Housing Act regarding accessibility standards.

2. Americans with Disabilities Act (ADA)

ADA standards are required for accessibility to places of public accommodation and commercial facilities by individuals with disabilities. These guidelines are to be applied during the design, construction, and alteration of such buildings and facilities to the extent required by regulations issued by federal agencies, including the Department of Justice, under the Americans with Disabilities Act of 1990. A complete description of the guidelines can be found at *www.ada.gov/stdspdf.htm*.

However, except for institutional settings, or rental offices and other facilities at residential complexes open to the public, ADA standards do not apply to residential housing.

3. Uniform Federal Accessibility Standards (UFAS)

UFAS accessibility standards are required for facility accessibility by physically handicapped persons for federal and federally-funded facilities. These standards are to be applied during the design, construction, and alteration of buildings and facilities to the extent required by the Architectural Barriers Act of 1968, as amended. A complete description of the guidelines can be found at www.access-board.gov/ufas/ufas-html/ufas.htm.

4. Illinois Accessibility Code

This code is intended to ensure that the built environment in the State of Illinois, including all spaces and elements of all applicable buildings and facilities, is designed, constructed and/or altered to assure the safety and welfare of all members of society and to be readily accessible and usable by environmentally limited persons.

5. Visitability Standards

The term "visitability" refers to single-family housing designed in such a way that it can be lived in or visited by people with disabilities. A house is visitable when it meets three basic requirements:

- At least one no-step entrance,
- Doors and hallways wide enough to navigate a wheelchair through, and
- A bathroom on the first floor big enough to get into using a wheelchair and close the door

6. Universal Design

Universal design is the design of products and environments to be usable by all people, to the greatest extent possible, without adaptation or specialized design. Seven principles guide Universal Design. These include:

- Equitable use (e.g., make the design appealing to all users)
- Flexibility in use (e.g., accommodate right- or left-handed use)
- Simple and intuitive use (e.g., eliminate unnecessary complexity)

- Perceptible information (e.g., provide compatibility with a variety of techniques or devices used by people with sensory limitations)
- Tolerance for error (e.g., provide fail-safe features)
- Low physical effort (e.g., minimize repetitive actions)
- Size and space for approach and use (e.g., accommodate variations in hand and grip size)

G. Methodology

The firm of Mullin & Lonergan Associates, Inc. (M&L) was retained as consultants to conduct the Analysis of Impediments to Fair Housing Choice. M&L utilized a comprehensive approach to prepare the AI for Davenport, Moline and Rock Island. The following sources were utilized:

- The most recently available demographic data regarding population, household, housing, income, and employment at the census tract, county, and/or state level
- Public policies affecting the siting and development of housing
- Administrative policies concerning housing and community development
- Financial lending institution data from the Home Mortgage Disclosure Act (HMDA) database
- Agencies that provide housing and housing related services to members of the protected classes
- Consolidated Plans, Annual Plans, and CAPERs from the three entitlement cities
- The 2006 Analysis of Impediments to Fair Housing Choice
- Fair housing complaints filed with HUD, Davenport Civil Rights Commission, Moline Human Rights Commission, Rock Island Human Rights Commission, Illinois Department of Human Rights, and Iowa Civil Rights Commission
- Real estate advertisements
- 2010 residential segregation data available from Census Scope
- Interviews and focus group sessions conducted with agencies and organizations that provide housing and housing related services to members of the protected classes.

H. Development of the AI

1. Lead Agency

The City of Moline Planning and Development Department (CMPDD) was the lead agency responsible for the preparation and implementation of the AI. Staff from the Department and from the City of Davenport Community Planning & Economic Development Department and the City of Rock Island Planning and Redevelopment Division were identified and invited numerous stakeholders to participate in the process for the purpose of developing a

thorough analysis with a practical set of recommendations to eliminate impediments to fair housing choice, where identified.

2. Agency Consultation

The three cities engaged in an extensive consultation process with local public agencies, nonprofit organizations and other interested entities in an effort to develop a community planning process for the AI. A series of written questionnaires were mailed to many of the interviewees and detailed lists of issues were developed for the focus group sessions and interviews.

In January 2012, the consulting team conducted a series of focus group sessions and individual interviews to identify current fair housing issues impacting the various agencies and organizations. Comments received through these meetings and interviews are incorporated throughout the AI, where appropriate.

A list of the stakeholders identified and invited to the focus group sessions and interviews is included in Appendix A.

I. The Relationship between Fair Housing and Affordable Housing

As stated in the Introduction, fair housing choice is defined as the ability of persons of similar income, regardless of race, color, religion, sex, disability, familial status, or national origin, of similar income levels to have available to them the same housing choices. In Davenport, this protection is also extended to persons based on age, marital status, ancestry, and gender identity or sexual orientation. In Illinois, the additional protected classes include sexual orientation, marital status, age, military status, gender identity, ancestry, unfavorable discharge from military service, and order of protection status. In Iowa, additional protected classes include sexual orientation, gender identity and creed. In Davenport, Illinois and Iowa and under the Fair Housing Act, an additional protected class is anyone retaliated against for having filed a charge, complained about discrimination, or participated in an investigation or court proceedings involving discrimination. Persons who are protected from discrimination by fair housing laws are referred to as members of the protected classes.

This AI analyzes a range of fair housing issues regardless of a person's income. To the extent that members of the protected classes tend to have lower incomes, then access to fair housing is related to affordable housing. In many areas across the U.S., a primary impediment to fair housing is a relative absence of affordable housing. Often, however, the public policies implemented in counties and cities create, or contribute to, the lack of affordable housing in these communities, thereby disproportionately affecting housing choice for members of the protected classes.

This document goes well beyond an analysis of the adequacy of affordable housing in the cities of Davenport, Moline and Rock Island. This AI defines the relative presence of members of the protected classes within the context of factors that influence the ability of the protected classes to achieve equal access to housing and related services.

2. Demographic Information

A. Demographic Profile

i. Population Trends

The cities of Davenport, IA, Moline, IL and Rock Island, IL are located in the Quad Cities metropolitan area along the Mississippi River in eastern Iowa and western Illinois. The three cities are part of the Davenport-Moline-Rock Island Metropolitan Statistical Area (MSA). The population of the MSA grew 5% overall between 1970 and 2010, but this growth was irregular between the decades that comprise this 40 year span. Between 1970 and 1980, the MSA's population grew almost 5.9%, but between 1980 and 1990, the population dropped 8.6%. Much of this population loss was recouped between 1990 and 2000 when the population rose 7.2%, and the population upswing continued with 1% growth between 2000 and 2010. However, the 2010 MSA population of 379,690 is still 1% below the MSA's peak population of 383,958 in 1980.

Of the three entitlement communities, only Davenport experienced a population gain (1%) between 1970 and 2010. During this period, Moline lost 6.0% of its population, while Rock Island's population plummeted more than 22%. Since 1990, Davenport's population has increased 4.1%, and Moline's population has risen almost 1.0%. However, Rock Island's population has fallen 10.9% during this period.

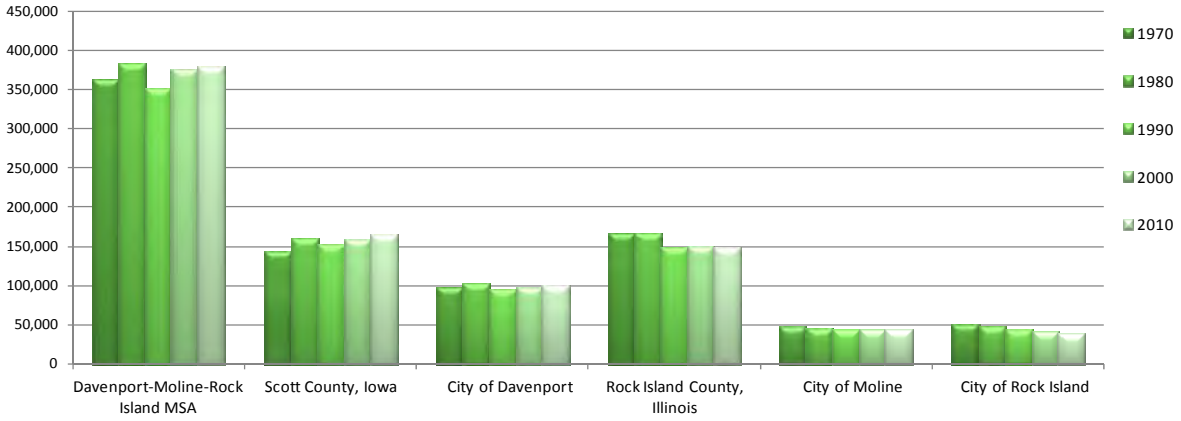
Figures 2-1 and 2-2 indicate the population changes in the MSA between 1970 and 2010.

Figure 2-1
Population Trends, 1970-2010

	1970	1980	1990	2000	2010	% Change 1970-2010
Davenport-Moline-Rock Island MSA	**362,638**	**383,958**	**350,861**	**376,019**	**379,690**	**5%**
Scott County, Iowa	142,687	160,022	150,973	158,689	165,224	15.8%
City of Davenport	98,673	103,616	95,729	98,359	99,685	1.0%
Rock Island County, Illinois	166,734	165,968	148,723	149,388	147,546	-11.5%
City of Moline	46,237	45,709	43,080	43,768	43,483	-6.0%
City of Rock Island	50,166	47,036	43,768	40,552	39,018	-22.2%

Source: U.S. Census Bureau

Figure 2-2
Population Trends in the Davenport-Moline-Rock Island MSA, 1970-2010



The total population in the Davenport-Moline-Rock Island MSA increased 5% between 1970 and 2010.

During this period, Davenport experienced a slight population gain (1%), but Moline and Rock island had population losses of 6.0% and 22.2%, respectively.

The MSA's population remains overwhelmingly White. Between 1990 and 2010, the White population grew 1.2%, from 322,805 to 326,648. But, in 1990, Whites were 92% of the MSA population. By 2010, Whites comprised just 86% of MSA residents.

Since 1990, population growth in the MSA has been chiefly in the non-White and Hispanic populations. Between 1990 and 2010, the number of non-White residents grew 89.1% and the Hispanic population increased 121%. Among non-White residents, the largest increases were in the Asian/Pacific Islander group (144.8%) and the Some Other Race group (77.7%). The Black population, which is the largest non-White group, grew 35.3% between 1990 and 2010.

Figure 2-3 contains racial and ethnic population trend statistics for the MSA between 1990 and 2010.

Figure 2-3
Population by Race and Ethnicity in the Davenport-Moline-Rock Island MSA, 1990-2010

	1990		2000		2010		% Change 1990-2010
	#	%	#	%	#	%	
Davenport-Rock Island-Moline, IA-IL MSA	**350,861**	**100.0%**	**359,062**	**100.0%**	**379,690**	**100.0%**	**8.2%**
White Population	322,805	92.0%	317,300	88.4%	326,648	86.0%	1.2%
Non-White Population	28,056	8.0%	41,762	11.6%	53,042	14.0%	89.1%
Black	19,115	5.4%	21,532	6.0%	25,860	6.8%	35.3%
Amer. Indian/Alaska Native	902	0.3%	962	0.3%	1,001	0.3%	11.0%
Asian / Pacific Islander	2,502	0.7%	4,236	1.2%	6,125	1.6%	144.8%
Some Other Race	5,537	1.6%	8,887	2.5%	9,839	2.6%	77.7%
Two or More Races	0	0.0%	6,145	1.7%	10,217	2.7%	0.0%
Hispanic	13,134	3.7%	20,703	5.8%	29,024	7.6%	121.0%

Source: U.S. Census Bureau

While the population of the Davenport-Moline-Rock Island MSA remains overwhelmingly White, the MSA's non-White population grew 89.1% between 1990 and 2010.

The 1990-2010 population trends in the three entitlement cities include both similarities and dissimilarities among themselves. While Davenport and Moline experienced population gains, Rock Island lost population. All three cities had declines in their White populations, and large gains in their non-White and Hispanic populations.

Davenport is the largest city in the MSA, and it has the largest minority population. Between 1990 and 2010, the total population rose by 4,352 residents. This increase resulted from substantial growth among non-White residents that more than offset the loss of 4,567 White residents. The non-White population grew by 8,919 residents, led by a 3,238 person increase in the Black population. Asian/Pacific Islanders, Persons of Two or More Races and Persons of Some Other Race also experienced significant growth. Hispanics, which includes persons of any race, more than doubled from 3,300 to 7,255 residents, making them the city's second largest minority population. Blacks remain the city's largest minority population, but less so than in 1990. Between 1990 and 2010, Blacks went from being 73% of Davenport's non-White population to just 56%.

Figure 2-4
Population by Race and Ethnicity in Davenport, 1990-2010

	1990		2000		2010		% Change
	#	%	#	%	#	%	1990-2010
City of Davenport	**95,333**	**100.0%**	**98,359**	**100.0%**	**99,685**	**100.0%**	**4.6%**
White Population	84,968	89.1%	82,311	83.7%	80,401	80.7%	-5.4%
Non-White Population	10,365	10.9%	16,048	16.3%	19,284	19.3%	86.0%
Black	7,521	7.9%	9,093	9.2%	10,759	10.8%	43.1%
Amer. Indian/Alaska Native	388	0.4%	368	0.4%	380	0.4%	-2.1%
Asian / Pacific Islander	1,000	1.0%	1,991	2.0%	2,216	2.2%	121.6%
Some Other Race	1,456	1.5%	2,279	2.3%	2,089	2.1%	43.5%
Two or More Races	---	---	2,317	2.4%	3,840	3.9%	65.7%
Hispanic	3,300	3.5%	5,268	5.4%	7,255	7.3%	119.8%

Source: U.S. Census Bureau

Among Davenport's non-White subpopulations, Asian/Pacific Islanders grew the most between 1990 and 2010 (121.6%). Blacks remain the City's largest non-White subpopulation.

Although Moline's population increased slightly between 1990 and 2010, the city's White population decreased significantly by 4,555 residents, while the non-White population almost tripled from 2,544 to 7,380. Moline's two largest non-White subpopulations – Persons of Some Other Race and Blacks – accounted for 56% of the growth among the non-White population.

The city's largest minority population, Hispanics, more than doubled between 1990 and 2010 – from 2,939 to 6,754.

Figure 2-5
Population by Race and Ethnicity in Moline, 1990-2010

	1990		2000		2010		% Change
	#	%	#	%	#	%	1990-2010
City of Moline	**43,202**	**100.0%**	**43,768**	**100.0%**	**43,483**	**100.0%**	**0.7%**
White Population	40,658	94.1%	38,682	88.4%	36,103	83.0%	-11.2%
Non-White Population	2,544	5.9%	5,086	11.6%	7,380	17.0%	190.1%
Black	865	2.1%	1,351	3.1%	2,251	5.2%	160.2%
Amer. Indian/Alaska Native	93	0.2%	87	0.2%	113	0.3%	21.5%
Asian / Pacific Islander	368	0.9%	618	1.4%	1,043	2.4%	183.4%
Some Other Race	1,218	3.0%	2,222	5.1%	2,554	5.9%	109.7%
Two or More Races	---	---	808	1.8%	1,419	3.3%	75.6%
Hispanic	2,939	7.2%	5,212	11.9%	6,764	15.6%	130.1%

Source: U.S. Census Bureau

With the exception of the American Indian/Alaska Native subpopulation, between 1990 and 2010, all of Moline's non-White subpopulations and the Hispanic population increased substantially.

Rock Island experienced a small population decline (1,534 persons) between 1990 and 2010. The population change reflected a large decrease in the White population of 4,507 residents and a gain of 2,973 in the non-White population.

Rock Island remains the most diverse of the three entitlement cities. Between 1990 and 2010, Rock Island's non-White population grew from 19% of the city's population to 28%. Blacks, by far the largest non-White subpopulation, grew just 2%, but some of the city's other non-White subpopulations, e.g., Asian/Pacific Islander and Persons of Some Other Race, almost tripled.

Hispanics, the city's second largest minority population, more than doubled from 1,531 to 3,664 residents.

Figure 2-6
Population by Race and Ethnicity in Rock Island, 1990-2010

	1990		2000		2010		% Change
	#	%	#	%	#	%	1990-2010
Rock Island City	**40,552**	**100.0%**	**39,684**	**100.0%**	**39,018**	**100.0%**	**-3.8%**
White Population	32,731	80.7%	30,609	77.1%	28,224	72.3%	-13.8%
Non-White Population	7,821	19.3%	9,075	22.9%	10,794	27.7%	38.0%
Black	6,983	17.2%	6,814	17.2%	7,122	18.3%	2.0%
Amer. Indian/Alaska Native	99	0.2%	113	0.3%	104	0.3%	5.1%
Asian / Pacific Islander	235	0.6%	325	0.8%	695	1.8%	195.7%
Some Other Race	504	1.2%	955	2.4%	1,423	3.6%	182.3%
Two or More Races	---	---	868	2.2%	1,450	3.7%	67.1%
Hispanic	1,531	3.8%	2,341	5.9%	3,664	9.4%	139.3%

Source: U.S. Census Bureau

Between 1990 and 2010, Rock Island's non-White population grew at a much lower rate than Davenport's and Moline's, but the Asian/Pacific Islander and Some Other Race non-White subpopulations and Hispanics increased substantially.

ii. Areas of Racial and Ethnic Minority Concentration (AOC)

In all three cities, the definitions of areas of concentration vary by race or ethnic group.

In Davenport:

- Black AOCs are any census block group that has a percentage of Blacks that is 10% greater than the city as a whole. Blacks comprise 10.79% of the city's population; therefore any block group with a Black population of at least 20.79% meets the criterion for a Black AOC. There are 14 such block groups in the city.
- Both Asian and Hispanic AOCs are census block groups that have percentages of those groups that are 5% greater than the city as a whole. Asians represent 2.18% of the city's population, while Hispanics are 7.28%. Therefore, an Asian AOC is a block group whose population is at least 7.18% Asian. A Hispanic AOC is a block group whose Hispanic population is at least 12.28%. Davenport has three Asian AOCs and 10 Hispanic AOCs.

- Maps 2-1, 2-2 and 2-3 illustrate the locations of Davenport's racial and ethnic AOCs. As the maps indicate, most of Davenport's Black and Hispanic AOCs are located in or near the downtown area.

In Moline:

- Both Black and Asian AOCs entail doubling the city's percentages of those populations. Blacks are 5.2% of the city's population; therefore any block group with a Black population of at least 10.4% meets the criterion for a Black AOC. There are four Black AOCs in Moline. Asians comprise 2.4% of Moline's total population. Thus, any block group with an Asian population of at least 4.8% is an Asian AOC. There are four Asian AOCs in the city.
- Hispanic AOCs are census block groups that have a percentage of Hispanics that is 5% greater than the city as a whole. Hispanics comprise 15.56% of the city's population. Therefore, a Hispanic AOC has a Hispanic population of 20.56% or more of the block group's total population. Moline has nine Hispanic AOCs. Maps 2-4, 2-5 and 2-6 depict Moline's racial and ethnic AOCs.
- As Maps 2-4, 2-5 and 2-6 indicate, most of Moline's Black AOCs and Asian AOCs are located in the southeastern corner of the city, while its Hispanic AOCs are located in the northwestern corner of the city.

In Rock Island:

- Black AOCs are census block groups that have a percentage of Blacks that is 10% greater than the city as a whole. Blacks account for 18.3% of the city's population; therefore, any block group with a Black population that is at least 28.3% meets the criterion for a Black AOC. There are 10 Black AOCs in Rock Island.
- Asian AOCs are census block groups with a percentage of Asians that is 6.8% or higher, which is 5% more than the city's Asian population rate as a whole – 1.8%. Rock Island has one Asian AOC.
- Hispanic AOCs are census block groups that have a Hispanic population rate greater than the city's overall Hispanic population rate of 9.39%. There are 17 Hispanic AOCs in Rock Island.

Maps 2-7, 2-8 and 2-9 illustrate Rock Island's racial and ethnic AOCs. As the maps indicate, Rock Island's Black AOCs are located in the western part of the city, and its Hispanic AOCs are located in northern section of the city, adjacent to the Hispanic AOCs in Moline. The city's Asian AOC is located in the northwestern part of the city.

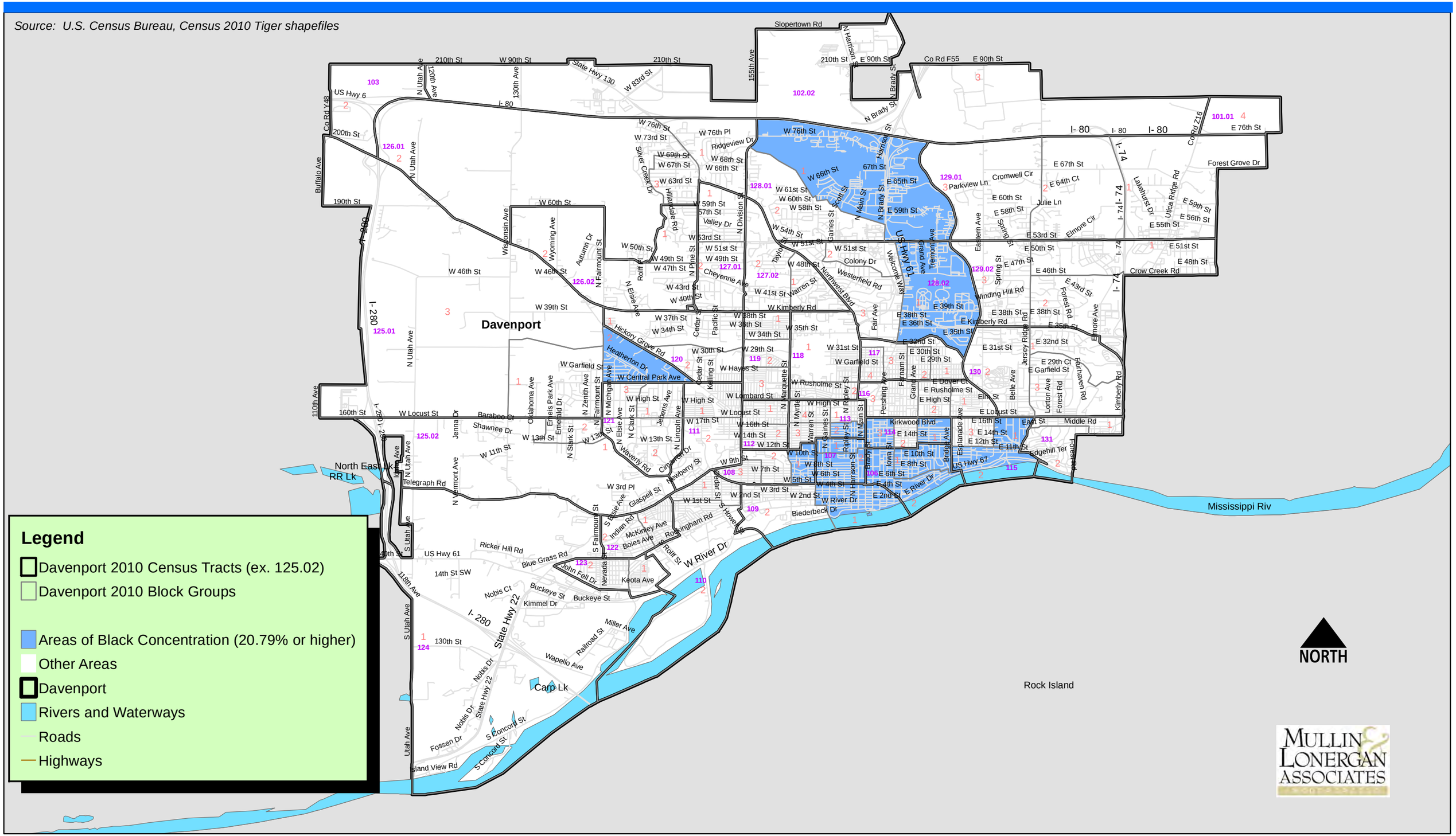
There are a total of 72 areas of minority concentration in the three entitlement communities. One half of these are concentrations of Hispanics, 28 are concentrations of Blacks, and just eight are concentrations of Asians.

Rock Island has the most AOCs (28), including the most Hispanic AOCs (17). Davenport has 27 AOCs, including the most Black AOCs (14). Half of Moline's 17 AOCs are concentrations of Hispanics.

Map 2-1: Concentration of Black Residents: City of Davenport, Iowa

Analysis of Impediments to Fair Housing Choice, 2012

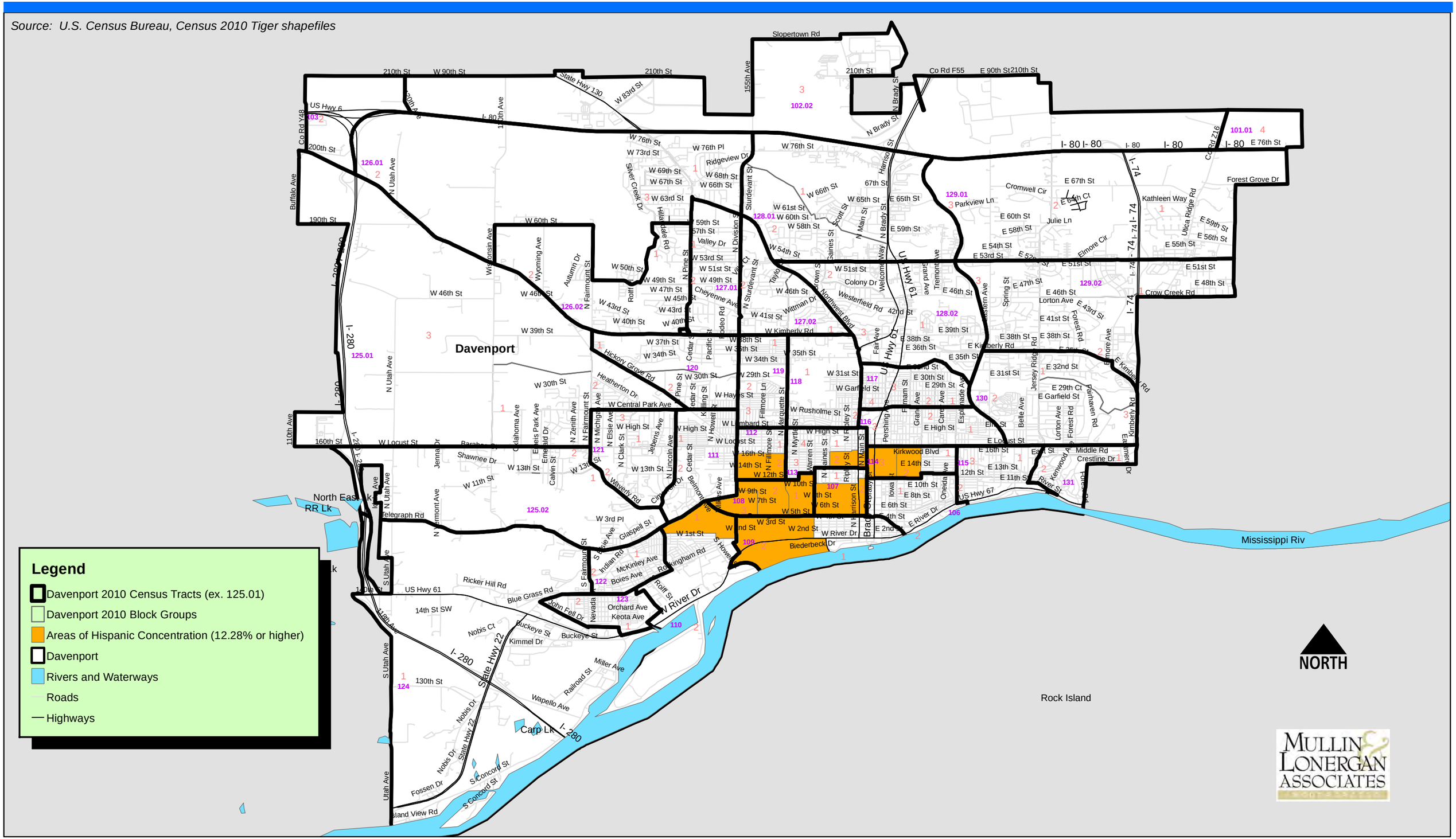
Source: U.S. Census Bureau, Census 2010 Tiger shapefiles



Map 2-2: Concentration of Hispanic Residents: City of Davenport, Iowa

Analysis of Impediments to Fair Housing Choice, 2012

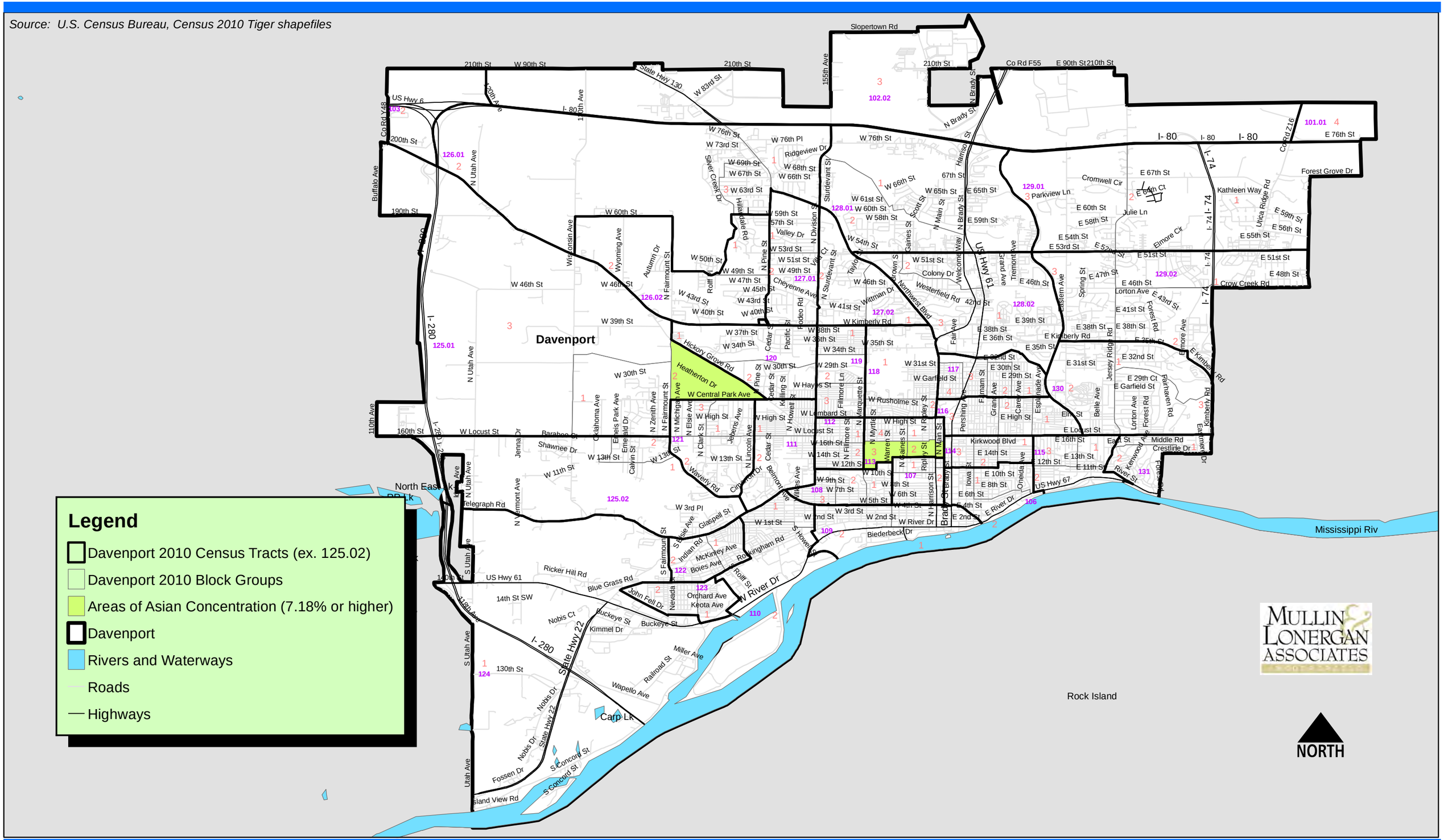
Source: U.S. Census Bureau, Census 2010 Tiger shapefiles



Map 2-3: Concentration of Asian Residents: City of Davenport, Iowa

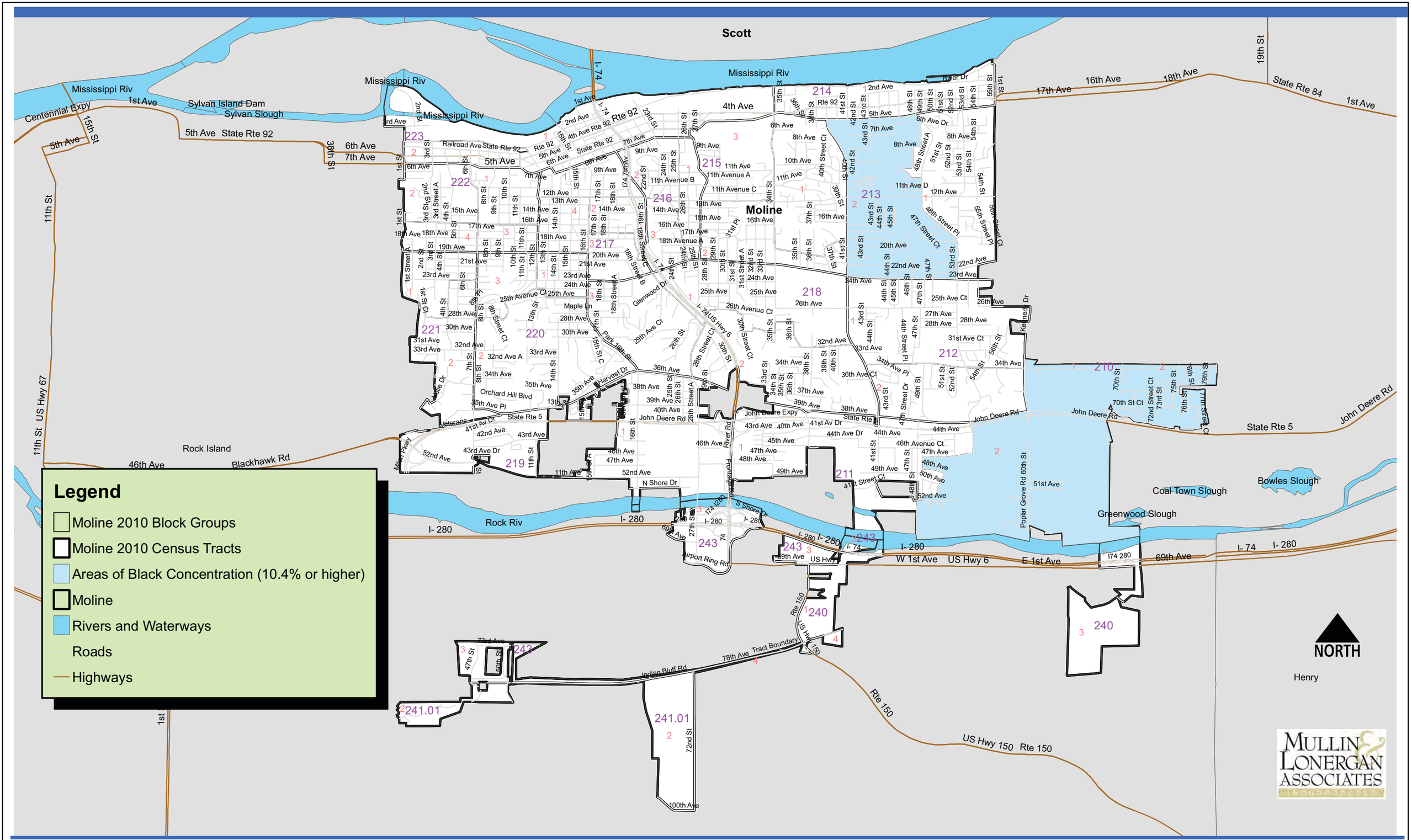
Analysis of Impediments to Fair Housing Choice, 2012

Source: U.S. Census Bureau, Census 2010 Tiger shapefiles



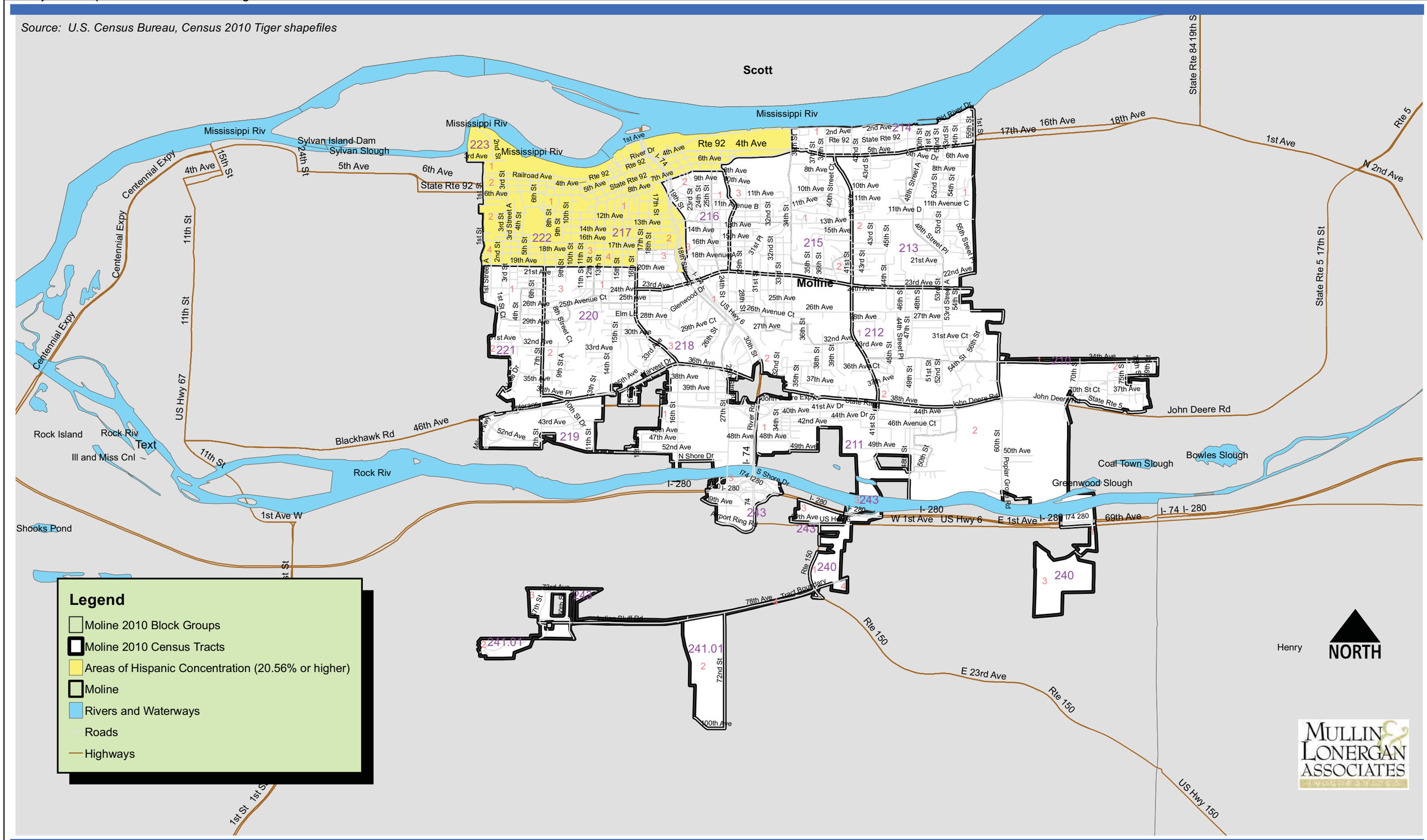
Map 2-4: Area of Black Concentration: City of Moline, Illinois

Analysis of Impediments to Fair Housing Choice, 2012 *Source: U.S. Census Bureau, Census 2010 Tiger shapefiles*



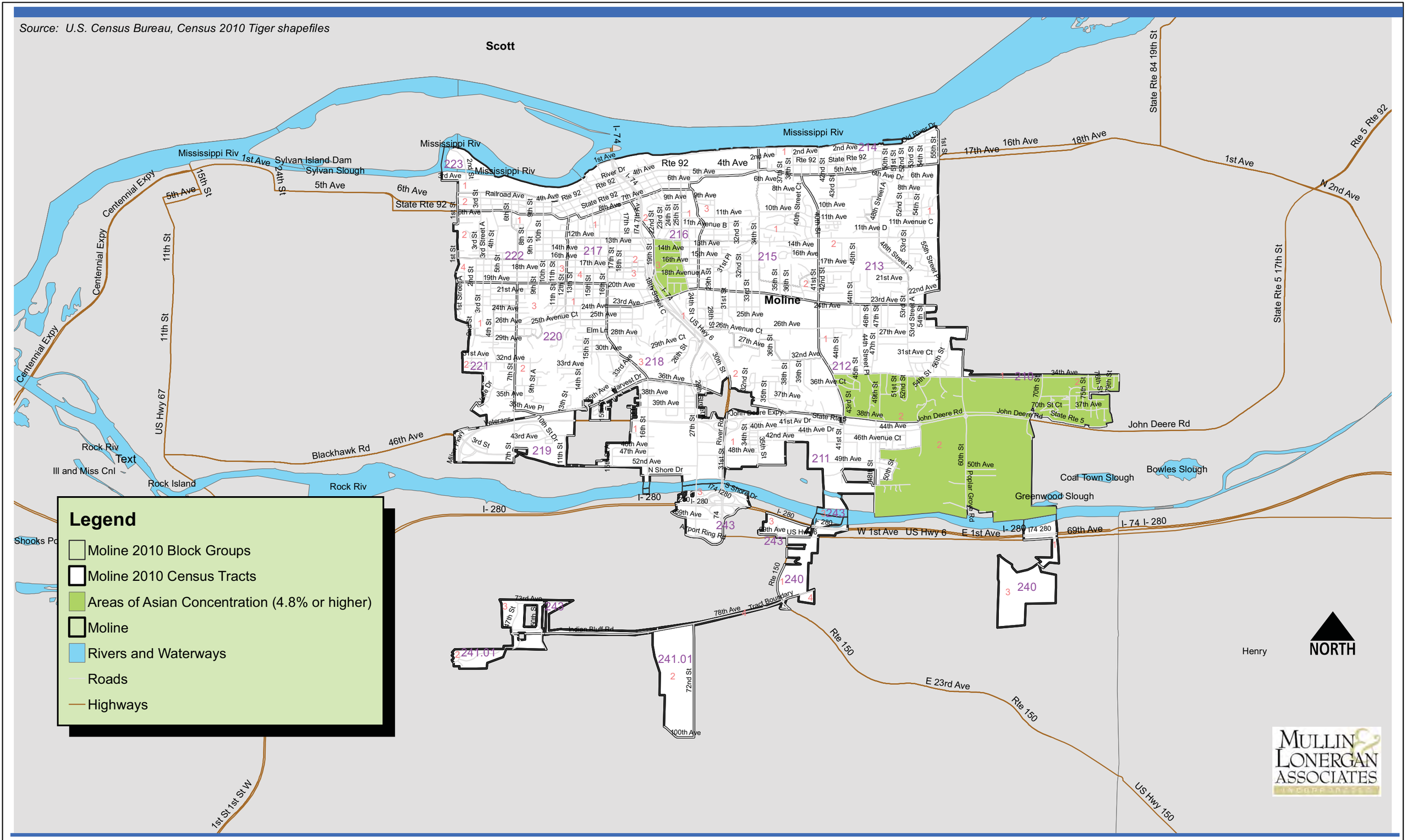
Map 2-5: Areas of Hispanic Concentration: City of Moline, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



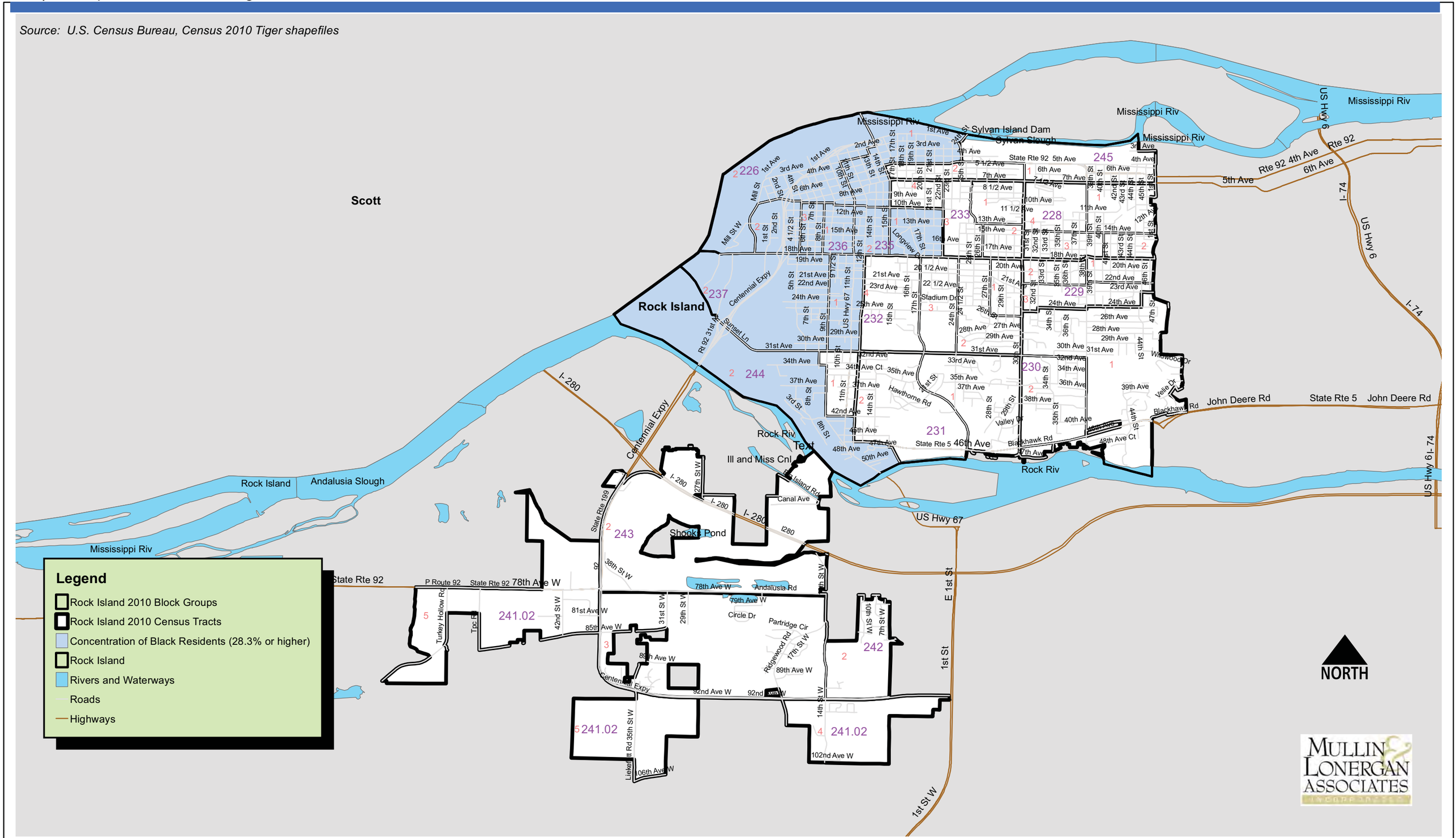
Map 2-6: Areas of Asian Concentration: City of Moline, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



Map 2-7: Concentration of Black Residents: City of Rock Island, Illinois

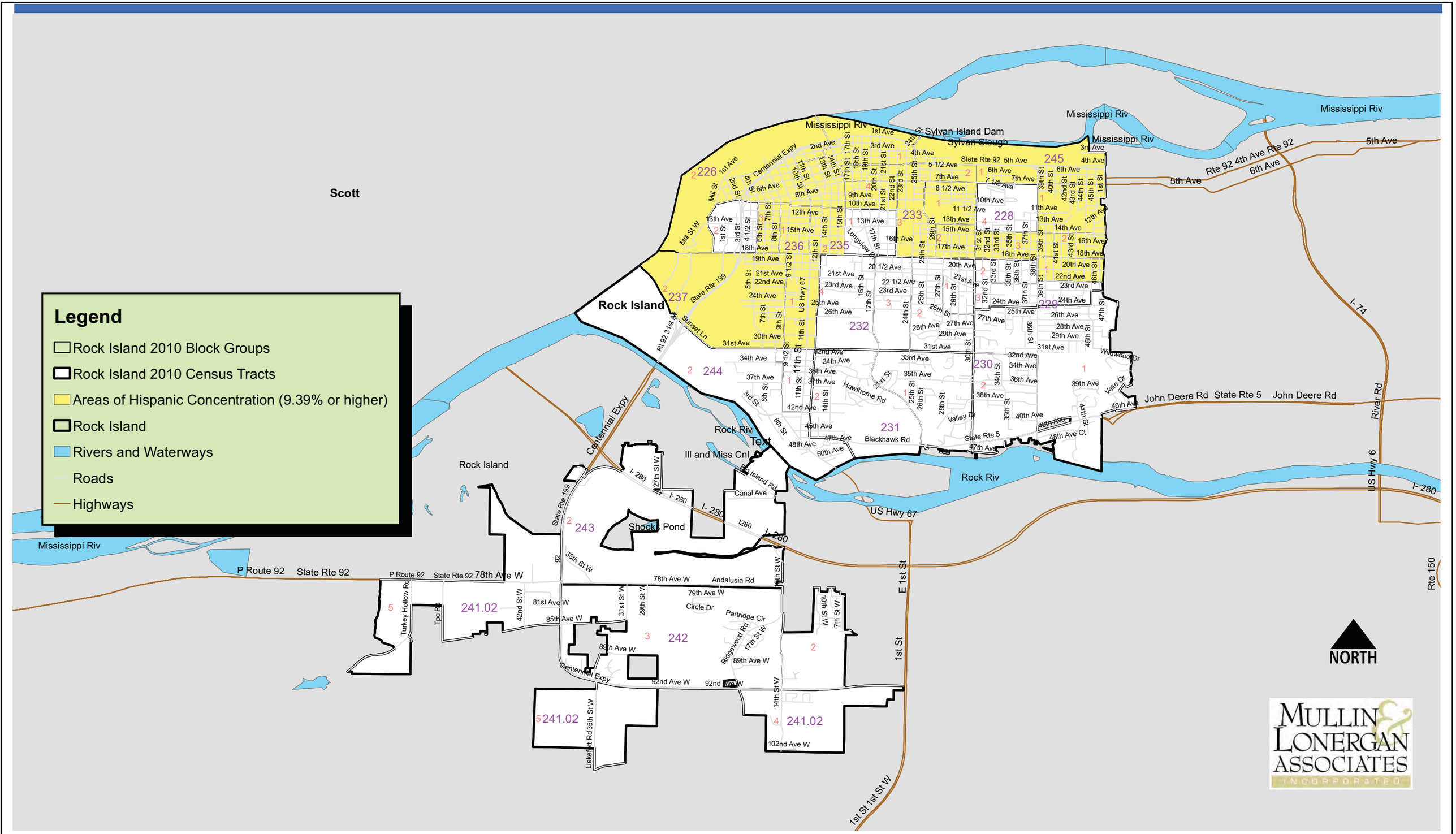
Analysis of Impediments to Fair Housing Choice, 2012



Map 2-8: Concentration of Hispanic Residents: City of Rock Island, Illinois

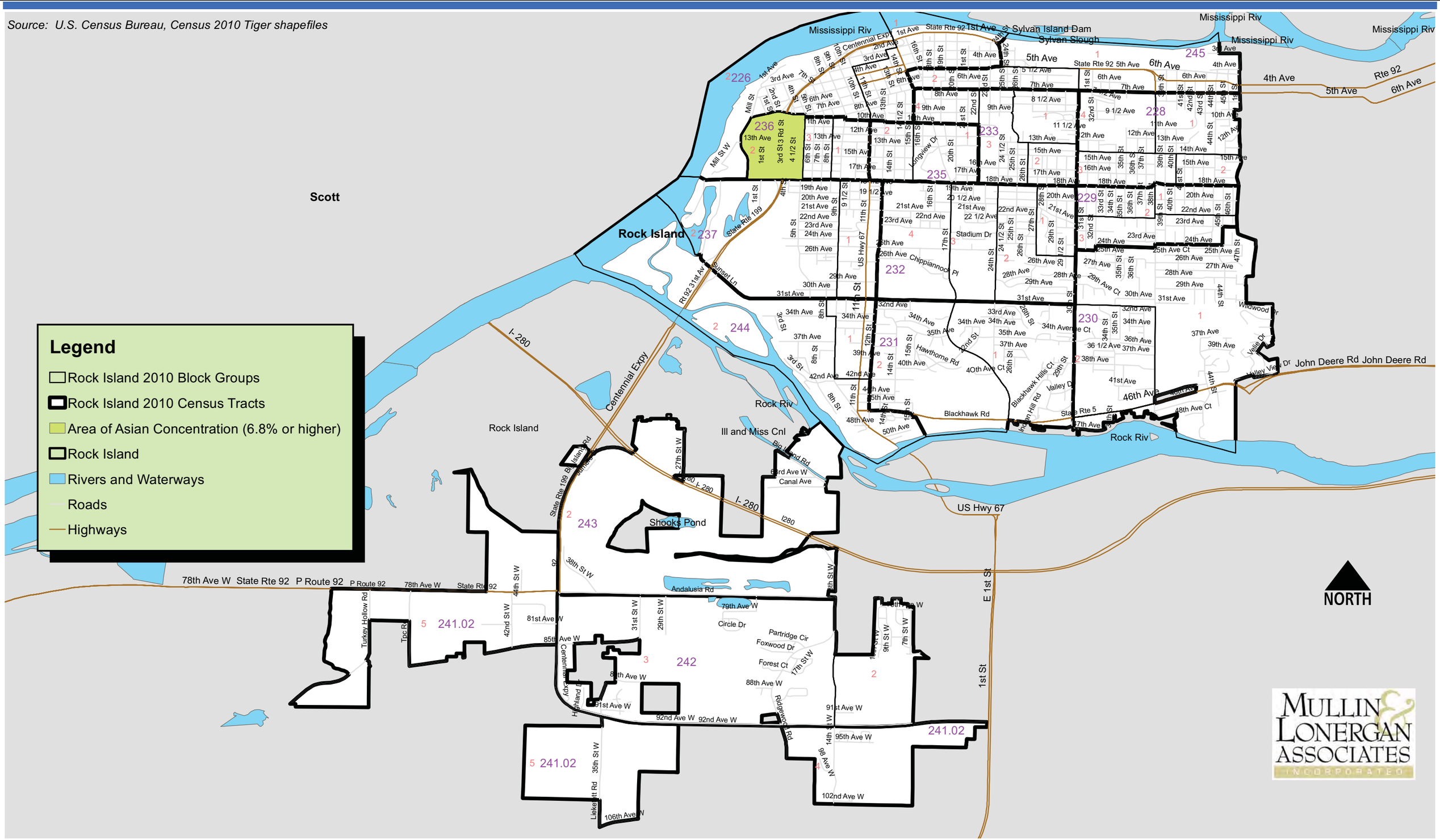
Analysis of Impediments to Fair Housing Choice, 2012

Source: U.S. Census Bureau, Census 2010 Tiger shapefiles



Map 2-9: Concentration of Asian Residents: City of Rock Island, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



iii. Residential Segregation Patterns

Residential segregation is a measure of the degree of separation of racial or ethnic groups living in a neighborhood or community. Typically, the pattern of residential segregation involves the existence of predominantly homogenous, White suburban communities and lower income minority inner-city neighborhoods. A potential impediment to fair housing is created where either latent factors, such as attitudes, or overt factors, such as real estate practices, limit the range of housing opportunities for minorities. A lack of racial or ethnic integration in a community creates other problems, such as reinforcing prejudicial attitudes and behaviors, narrowing opportunities for interaction, and reducing the degree to which community life is considered harmonious. Areas of extreme minority isolation often experience poverty and social problems at rates that are disproportionately high. Racial segregation has been linked to diminished employment prospects, poor educational attainment, increased infant and adult mortality rates, and increased homicide rates.

The distribution of racial or ethnic groups across a geographic area can be analyzed using an index of dissimilarity. This method allows for comparisons between subpopulations, indicating how much one group is spatially separated from another within a community. The index of dissimilarity is rated on a scale from 0 to 100, in which a score of 0 corresponds to perfect integration and a score of 100 represents total segregation.[1] The index is typically interpreted as the percentage of the minority population that would have to move in order for a community or neighborhood to achieve full integration. A dissimilarity index of less than 30 indicates a low degree of segregation, while values between 30 and 60 indicate moderate segregation, and values above 60 indicate high segregation.

(NOTE: When considering dissimilarity indices, if the number of persons in a minority subpopulation is small [e.g., less than 1,000], the indices should be evaluated with caution. In cases where a subgroup population is small, the dissimilarity index may be high even if the group's members are evenly dispersed. This caveat should be applied to the American Indian/Alaska Native (AIAN) subpopulations in all three cities and the Asian subpopulations in Moline and Rock Island.)

Dissimilarity indices in the following charts show that the three entitlement cities have low to moderate levels of segregation between Whites and minority populations. In Davenport, only the White/Black Index (35.9) falls into the moderate range. All other indices are in the low range.

In Moline, three dissimilarity indices---White/Asian (38.8), White/Other (33.8) and White/Hispanic (32.2) are in the moderate range. The City's White/Black Index and White/Two or More Races Index are in the low range.

In Rock Island, the White/Black index (51.3) and the White/Other Index (40.3) are in the moderate range, but the White/Hispanic Index (29.7) and the White/Two or More Races Index (29.5) are just below the moderate threshold.

Figures 2-7, 2-8 and 2-9 contain dissimilarity index data for the three cities.

[1] The index of dissimilarity is a commonly used demographic tool for measuring inequality. For a given geographic area, the index is equal to **1/2 ∑ ABS [(b/B)-(a/A)]**, where b is the subgroup population of a census tract, B is the total subgroup population in a city, a is the majority population of a census tract, and A is the total majority population in the city. ABS refers to the absolute value of the calculation that follows.

Figure 2-7
Dissimilarity Indices in Davenport, 2010

	DI with White Population*	Population	% of Total Population
White	---	80,401	80.7%
Black	35.9	10,759	10.8%
American Indian/Alaska Native	19.9	380	0.4%
Asian	25.1	2,216	2.2%
Other	27.8	2,089	2.1%
Two or more races	20.2	3,840	3.9%
Hispanic	20.5	7,255	7.3%
TOTAL	**---**	**99,685**	**100.0%**

* Each dissimilarity index indicates the percentage of one of the two population groups compared that would have to move to different geographic areas to create a completely even demographic distribution in the community.
Note: Hispanic ethnicity is counted independently of race
Source: U.S. Census Bureau, Census 2010; Calculations by Mullin & Lonergan Associates

Figure 2-8
Dissimilarity Indices in Moline, 2010

	DI with White Population*	Population	% of Total Population
White	---	36,103	36.2%
Black	25.3	2,251	2.3%
American Indian/Alaska Native	21.5	113	0.1%
Asian	38.8	1,043	1.0%
Other	33.8	2,554	2.6%
Two or more races	22.6	1,419	1.4%
Hispanic	32.2	6,764	6.8%
TOTAL	**---**	**43,483**	**43.6%**

* Each dissimilarity index indicates the percentage of one of the two population groups compared that would have to move to different geographic areas to create a completely even demographic distribution in the community.
Note: Hispanic ethnicity is counted independently of race
Source: U.S. Census Bureau, Census 2010; Calculations by Mullin & Lonergan Associates

Figure 2-9
Dissimilarity Indices in Rock Island, 2010

	DI with White Population*	Population	% of Total Population
White	---	28,224	28.3%
Black	51.3	7,122	7.1%
American Indian/Alaska Native	25.5	104	0.1%
Asian	39.0	695	0.7%
Other	40.3	1,423	1.4%
Two or more races	29.5	1,450	1.5%
Hispanic	29.7	9,439	9.5%
TOTAL	**---**	**39,018**	**39.1%**

* Each dissimilarity index indicates the percentage of one of the two population groups compared that would have to move to different geographic areas to create a completely even demographic distribution in the community.
Note: Hispanic ethnicity is counted independently of race
Source: U.S. Census Bureau, Census 2010; Calculations by Mullin & Lonergan Associates

The cities of Davenport, Moline and Rock Island have low to moderate levels of segregation between Whites and minority populations.

> ***In the cases of Davenport and Rock Island, the highest dissimilarity indices were noted for Whites/Blacks: 35.9 in Davenport and 51.3 in Rock Island.***

iv. Race/Ethnicity and Income

Household income is one of several factors used to determine a household's eligibility for a home mortgage loan or an apartment lease. In 2010, Moline's median household income ($49,290) was significantly above Davenport's ($42,261) and Rock Island's ($41,475). In all three cities, Whites had the highest median household income, followed by Hispanics and Blacks. Conversely, in all three cities, Whites had the lowest poverty rates, followed by Hispanics and Blacks. The data in Figure 2-10 below indicates the significant disparities between and among these populations in terms of median household income and poverty rates.

Figure 2-10
Race/Ethnicity, Income and Poverty, 2010

	Median Household Income	Poverty Rate
City of Davenport	**$42,261**	**17.7%**
Whites	$45,704	14.2%
Blacks	$24,309	38.6%
Hispanics	$34,505	23.5%
City of Moline	**$49,290**	**9.6%**
Whites	$50,816	8.8%
Blacks	$29,348	18.0%
Hispanics	$37,603	15.4%
City of Rock Island	**$41,475**	**15.7%**
Whites	$45,859	11.5%
Blacks	$26,535	30.5%
Hispanics	$33,000	21.6%

Source: U.S. Census Bureau, 2006-2010 American Community Survey (B19013, B19013A, B19013B, B19013D, B19013I, B17001, B17001A, B17001B)

As Figure 2-11 shows, the distribution of household income among income brackets varies between and among the three entitlement cities and their racial and ethnic populations. The household income bracket with the biggest disparity among the cities was the $0-$24,999 bracket. In Moline, 21.7% of households had incomes in this category, compared to 31.4% in Rock Island. The household income bracket with the least disparity among the cities was the $25,000-$49,999 bracket. In Rock Island, 26.6% of households had income in this category, compared to 29.0% in Davenport.

The data in the lowest and highest income brackets for racial and ethnic groups allows the following observations: In the $0-$24,999 income bracket, there are a lower percentage of White and Asian households than there are Black and Hispanic households in Davenport and Moline. However, in Rock Island, White households and Hispanic households have the lower percentages in this income bracket. Black households are the highest percentage in this income bracket in Davenport and Rock Island, but Hispanic households are the highest percentage in Moline.

At the opposite end of the spectrum, White and Asian households have the highest percentage of households in the $75,000 and higher income bracket in Moline and Rock Island, and White and Hispanic households have the highest percentage of households in this income bracket in Davenport. In Davenport, Asian households have the lowest percentage of households in this income bracket, while Black households have the lowest percentage in Moline, and Hispanic households have the lowest percentage in Rock Island.

Figure 2-11
Household Income Distribution by Race and Ethnicity, 2010

	Total	$0 to $24,999		$25,000 to $49,999		$50,000 to $74,999		$75,000 and higher	
		#	%	#	%	#	%	#	%
City of Davenport									
All Households	**40,828**	**11,832**	**29.0%**	**11,860**	**29.0%**	**7,047**	**17.3%**	**10,089**	**24.7%**
White Households	34,791	9,147	26.3%	9,867	28.4%	6,433	18.5%	9,344	26.9%
Black Households	4,181	2,143	51.3%	1,234	29.5%	309	7.4%	495	11.8%
Asian Households	597	139	23.3%	231	38.7%	163	27.3%	64	10.7%
Hispanic Households	1,716	551	49.7%	634	57.2%	270	24.3%	261	23.5%
City of Moline									
All Households	**18,238**	**3,959**	**21.7%**	**5,267**	**28.9%**	**3,855**	**21.1%**	**5,157**	**28.3%**
White Households	15,992	3,325	20.8%	4,528	28.3%	3,378	21.1%	4,761	29.8%
Black Households	634	283	44.6%	172	27.1%	123	19.4%	56	8.8%
Asian Households	373	27	7.2%	95	25.5%	109	29.2%	142	38.1%
Hispanic Households	1,954	582	52.5%	678	61.1%	381	34.4%	313	28.2%
Rock Island City									
All Households	**15,536**	**4,872**	**31.4%**	**4,139**	**26.6%**	**2,985**	**19.2%**	**3,540**	**22.8%**
White Households	12,182	3,287	27.0%	3,199	26.3%	2,512	20.6%	3,184	26.1%
Black Households	2,801	1,352	48.3%	770	27.5%	391	14.0%	288	10.3%
Asian Households	57	22	38.6%	-	0.0%	24	42.1%	11	19.3%
Hispanic Households	740	301	27.1%	274	24.7%	85	7.7%	80	7.2%

Source: U.S. Census Bureau, 2006-2010 American Community Survey (C19001, C19001A, C19001B, C19001D, C19001I)

Generally, Black and Hispanic households were more likely than White and Asian households to have annual incomes of less than $25,000.

At least 45% of Black households in each of the three cities earned less than $25,000 annually, as did half of the Hispanic households in Davenport and Moline.

v. Concentrations of Low and Moderate Income Persons

The CDBG program includes a statutory requirement that at least 70% of the funds invested by entitlement communities benefit low and moderate income (LMI) persons. As a result, HUD calculates the percentage of LMI persons in each census block group for entitlement communities such as Davenport, Moline and Rock Island.

HUD data indicates that there are 26 census block groups in Davenport where at least 51.0% of residents (for whom this rate is determined) meet the criterion to be classified as LMI. These 26 block groups are considered concentrations of LMI persons. Of these 26 LMI block groups, 18 are also identified as areas of minority concentration.

Areas that are concentrations of both LMI residents and areas of minority concentration are termed impacted areas. Thus, Davenport has 18 impacted areas. Maps 2-10 and 2-11 illustrate Davenport's LMI Areas and Impacted Areas.

In Moline, there are nine census block groups that are classified as concentrations of LMI residents. All but one of these nine block groups are also areas of minority concentration.

Moline therefore has eight block groups that qualify as Impacted Areas. Maps 2-12 and 2-13 illustrate the city's Areas of LMI residents and Impacted Areas

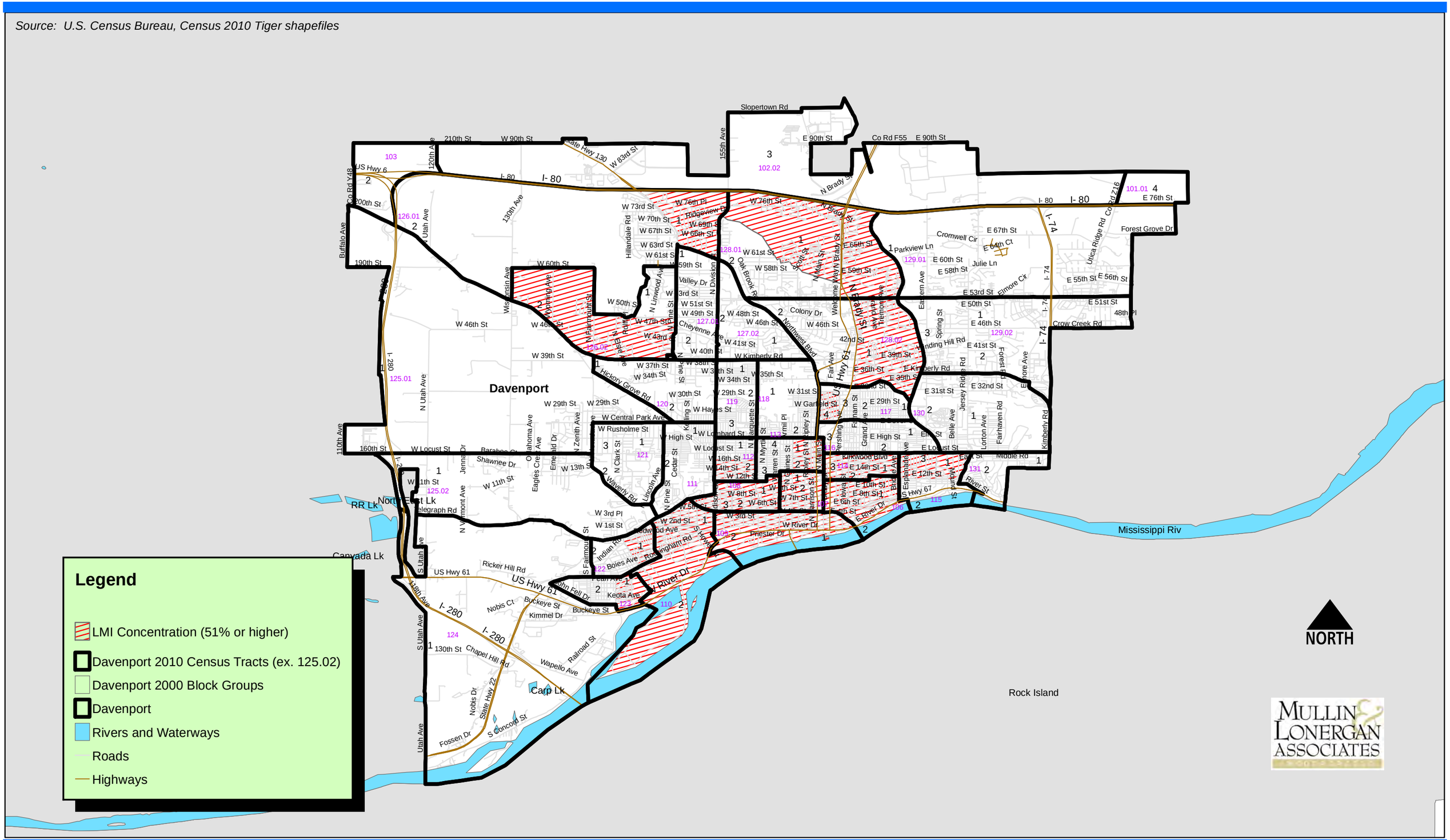
Rock Island has 24 census block groups that are classified as concentrations of LMI residents. Of these 24 block groups, 23 are also areas of minority concentration. Rock Island thus has 23 block groups that qualify as Impacted Areas. Maps 2-14 and 2-15 illustrate the city's Areas of LMI residents and Impacted Areas.

There are 18 impacted areas in Davenport, 8 in Moline, and 23 in Rock Island. These impacted areas include concentrations of both LMI persons and minorities.

Map 2-10: Concentration of LMI Residents: City of Davenport, Iowa

Analysis of Impediments to Fair Housing Choice, 2012

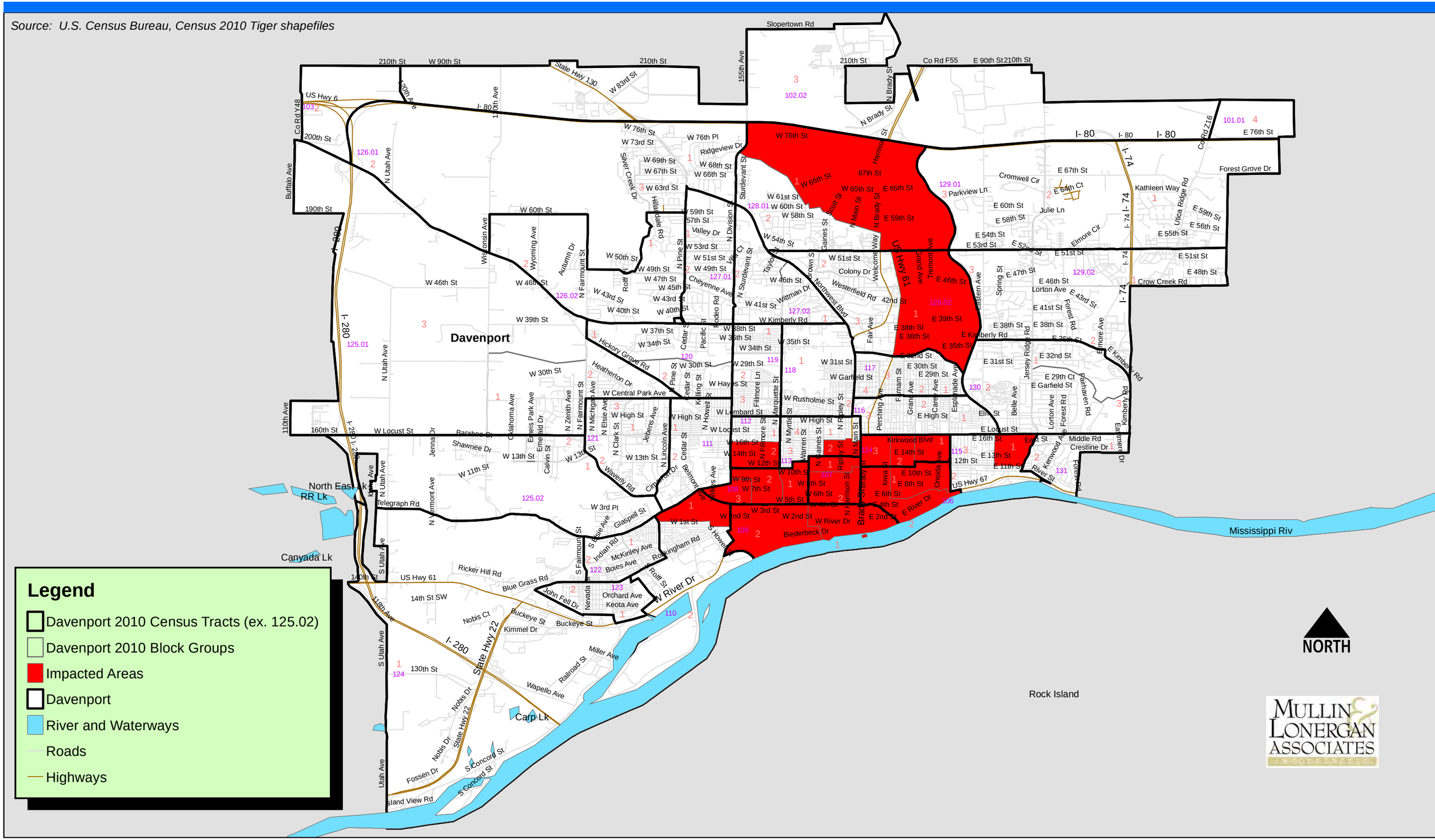
Source: U.S. Census Bureau, Census 2010 Tiger shapefiles



Map 2-11: Impacted Areas: City of Davenport, Iowa

Analysis of Impediments to Fair Housing Choice, 2012

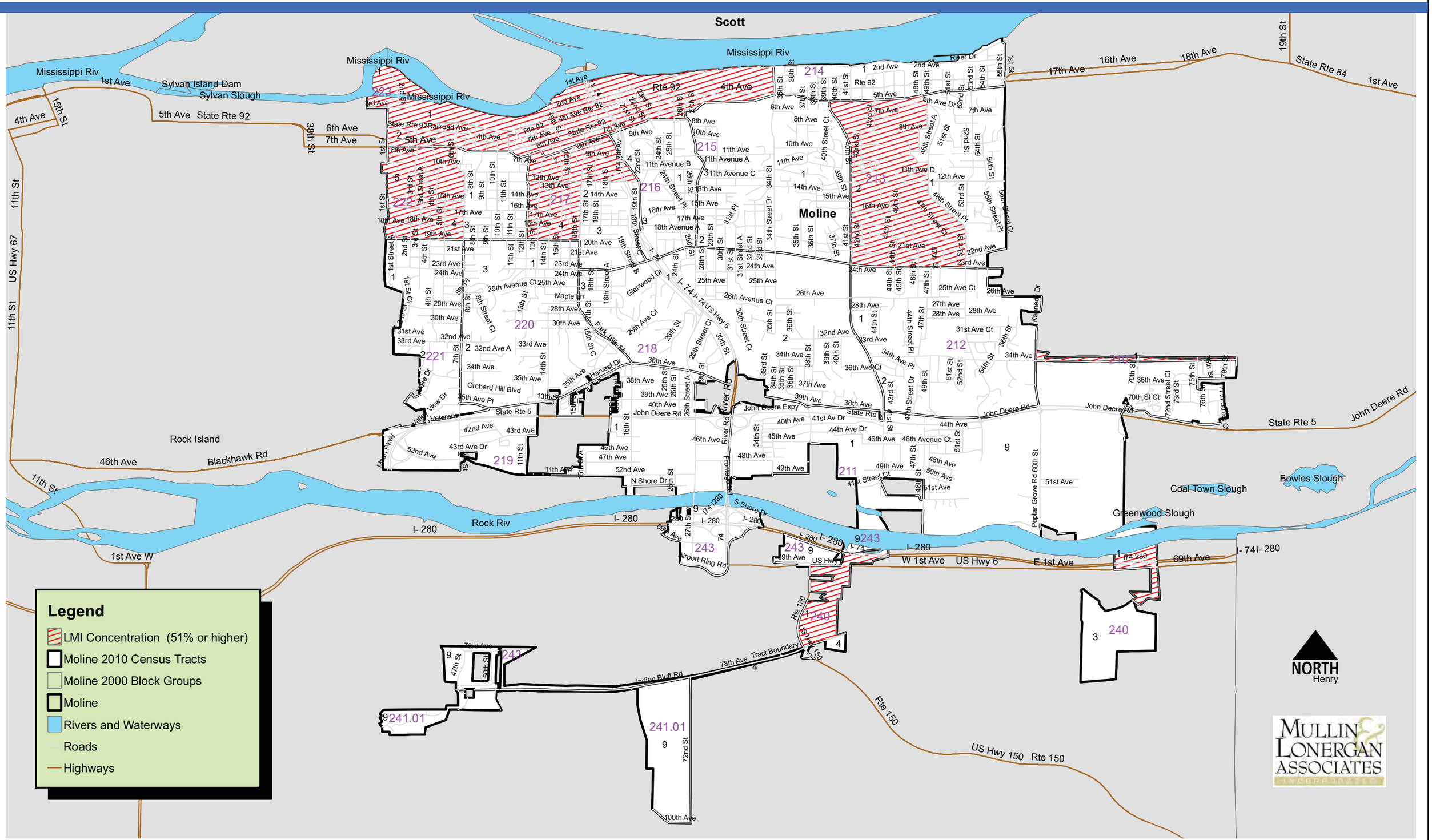
Source: U.S. Census Bureau, Census 2010 Tiger shapefiles



Map 2-12: Concentration of LMI Residents: City of Moline, Illinois

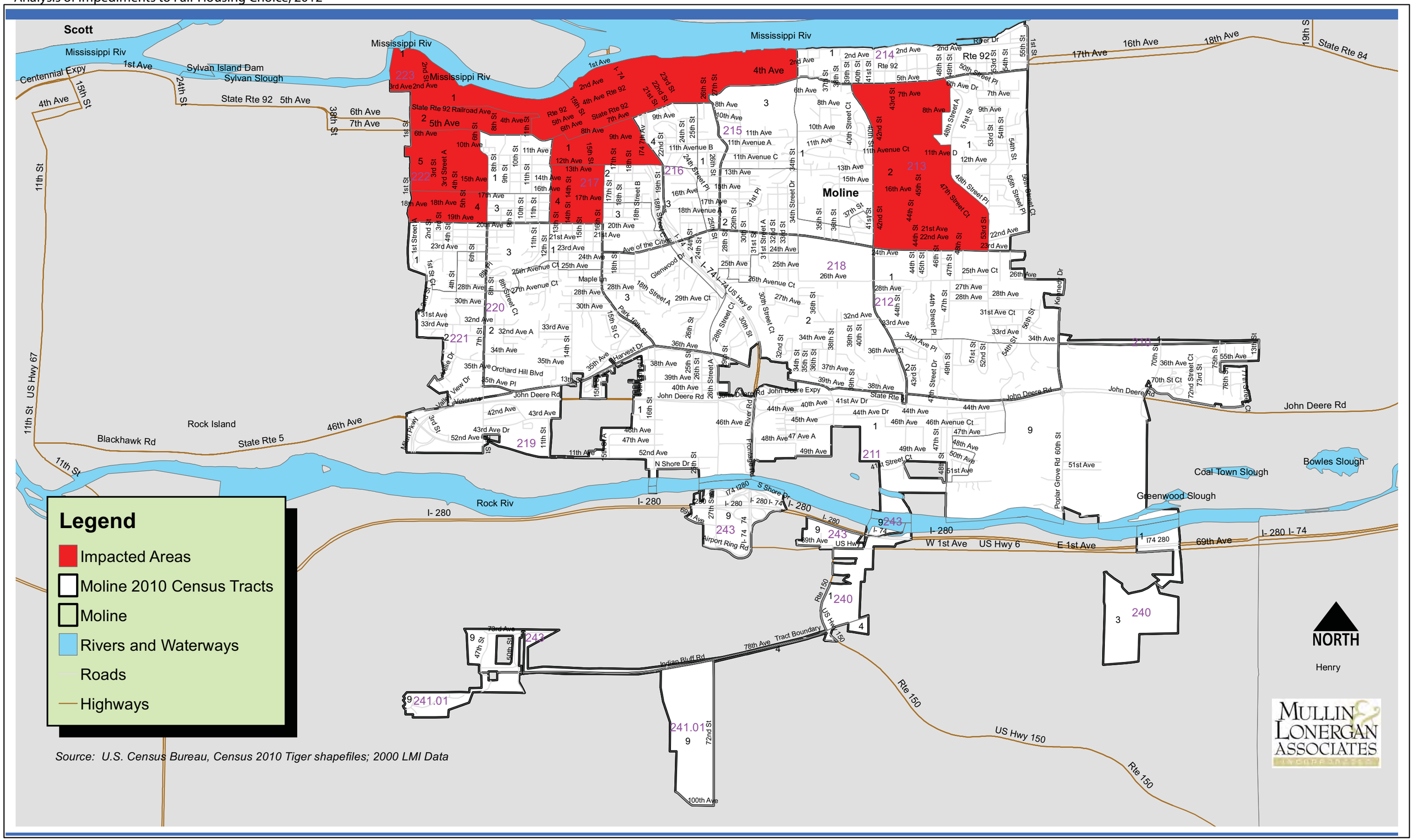
Analysis of Impediments to Fair Housing Choice, 2012

Source: U.S. Census Bureau, Census 2010 Tiger shapefiles; 2000 LMI Data



Map 2-13 Impacted Areas: City of Moline, Illinois

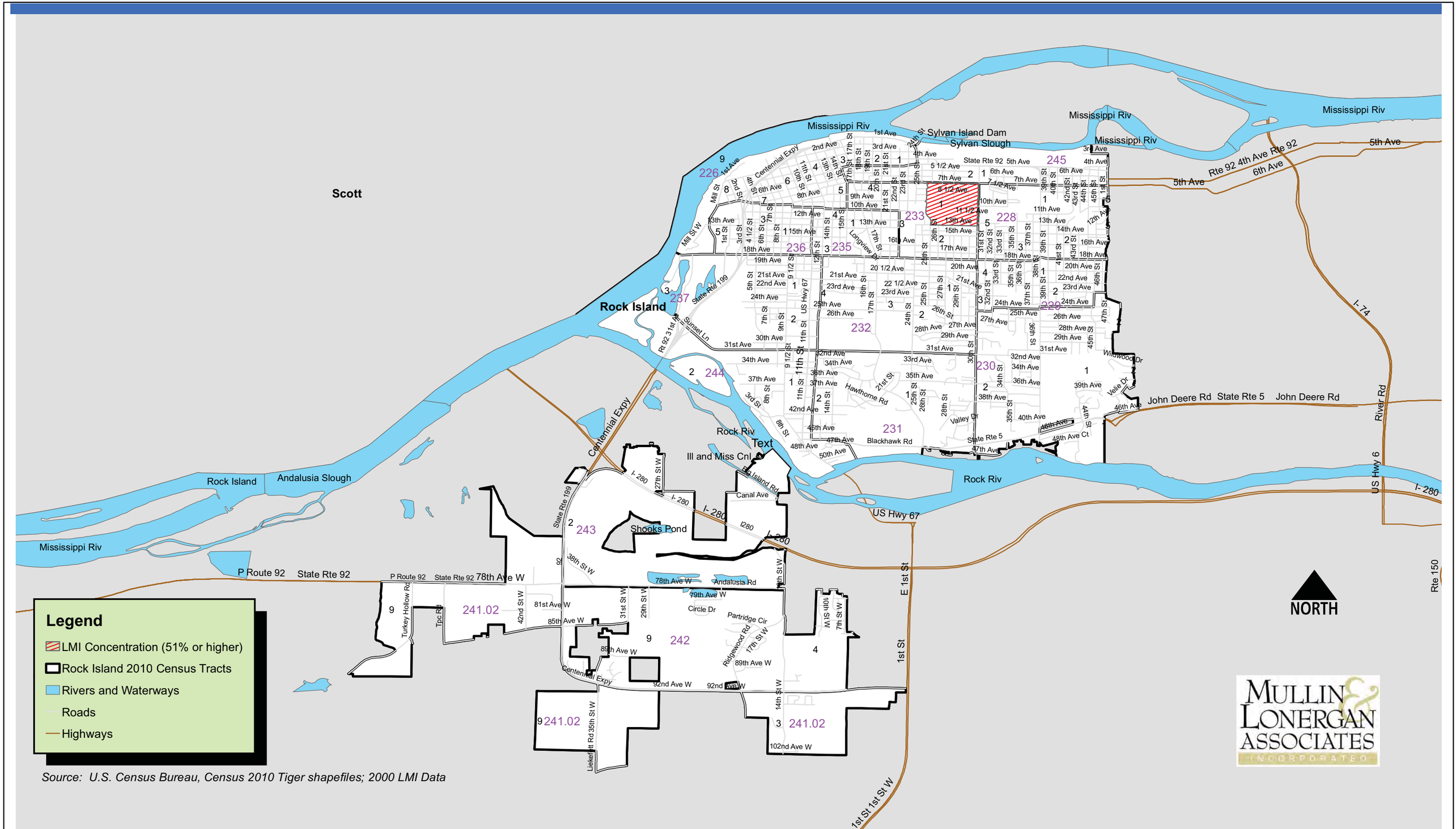
Analysis of Impediments to Fair Housing Choice, 2012



Source: U.S. Census Bureau, Census 2010 Tiger shapefiles; 2000 LMI Data

Map 2-14: Concentration of LMI Residents: City of Rock Island, Illinois

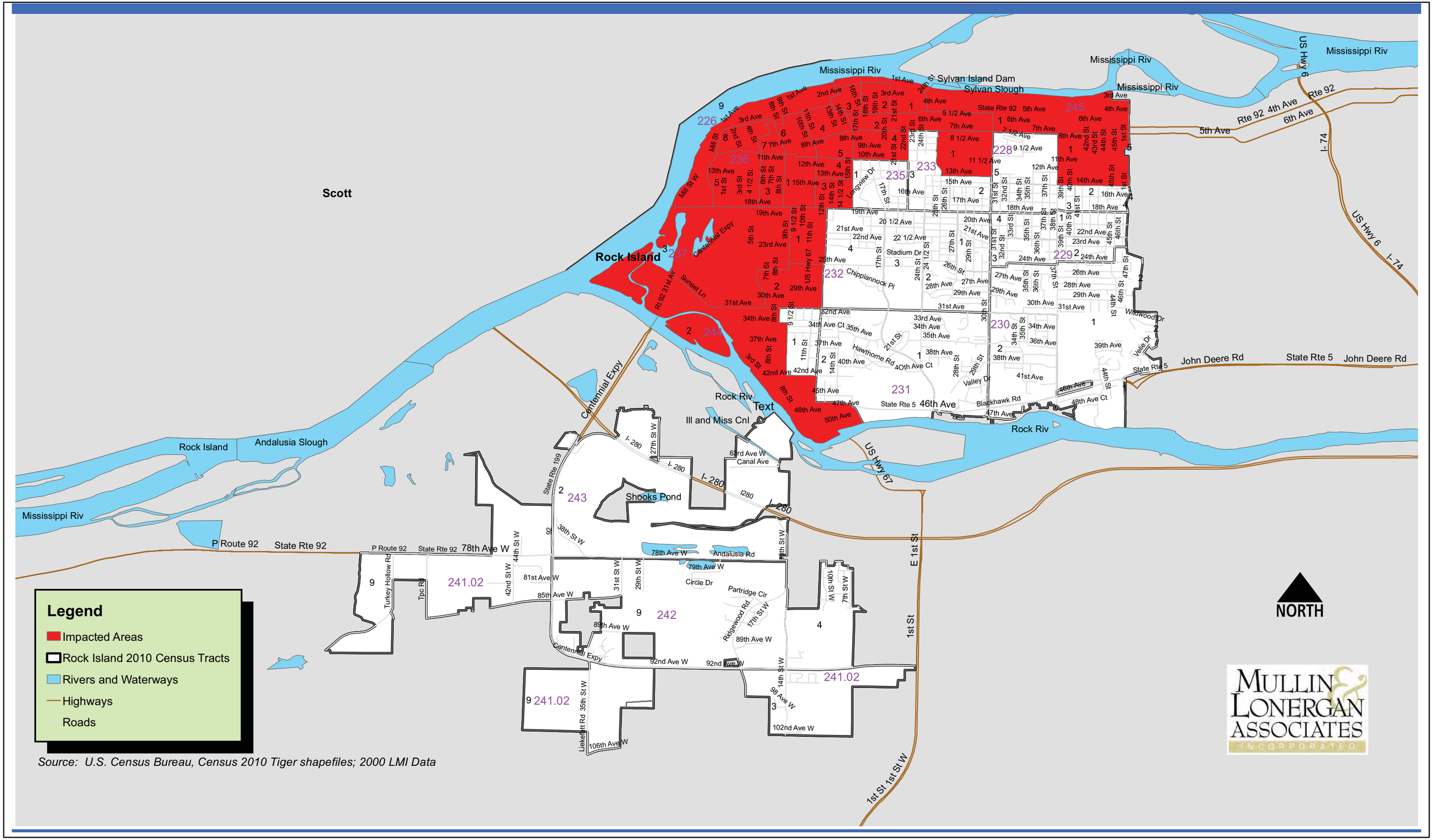
Analysis of Impediments to Fair Housing Choice, 2012



Source: U.S. Census Bureau, Census 2010 Tiger shapefiles; 2000 LMI Data

Map 2-15: Impacted Areas: City of Rock Island, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



Source: U.S. Census Bureau, Census 2010 Tiger shapefiles; 2000 LMI Data

vi. Disability and Income

The Census Bureau reports disability status for non-institutionalized disabled persons age 5 and over. As defined by the Census Bureau, a disability is a long-lasting physical, mental, or emotional condition that can make it difficult for a person to perform activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home alone or to work at a job or business. The Fair Housing Act prohibits discrimination in housing against persons with disabilities.

According to the most recent U.S. Census Bureau data (2008—2010 American Community Survey), 10.9% of Davenport's population age 5 and older has at least one disability. The corresponding figures for Moline and Rock Island are 10.7% and 13.1%, respectively.

According to the National Organization on Disabilities, a significant income gap exists for persons with disabilities, given their lower rate of employment. In Davenport, among all persons with a disability, 23% were living below the poverty level. Among persons without a disability, 17% were living below the level of poverty.

In Moline, among all persons with a disability, 21% were living below the poverty level. Among persons without a disability, just 6% were living below the level. In other words, someone with a disability was more than three times as likely to be living in poverty as a person without a disability.

In Rock Island, among all persons with a disability, 22% were living below the poverty level. Among persons without a disability, 11% were living below the level. That is, a person with a disability was twice as likely to be living in poverty as someone without a disability.

In 2010, persons with disabilities were much more likely to live in poverty than persons without disabilities.

> ***In Rock Island, people with disabilities were twice as likely to be living in poverty compared to people without disabilities. In Moline, they were more than three times as likely to be living in poverty.***

vii. Familial Status and Income

The Census Bureau divides households into family and non-family households. Family households are married couple families with or without children, single-parent families, and other families made up of related persons. Non-family households are either single persons living alone, or two or more non-related persons living together.

Title VIII of the Civil Rights Act of 1968 protects against gender discrimination in housing. Protection for families with children was added in the 1988 amendments to Title VIII. Except in limited circumstances involving elderly housing and owner-occupied buildings of one to four units, it is unlawful to refuse to rent or sell to families with children.

In Davenport, the proportion of female-headed households decreased slightly from 13.4% in 2000 to 13.2% in 2010, but female-headed households with children increased slightly from 9.1% to 9.3%. By comparison, married-couple family households with children

declined from 20.4% to 16.1% of all households. There was a slight decrease in the rate of male-headed households with children from 2.3% to 2.0% during this period.

Figure 2-12 provides more detailed data on familial status in Davenport.

Figure 2-12
Households by Type and Presence of Children in Davenport, 2000-2010

	2000		2010	
	#	%	#	%
Total Households	**39,124**	**100.0%**	**40,828**	**100.0%**
Family Households	24,811	63.4%	24,080	59.0%
Married-couple family	18,002	46.0%	16,977	41.6%
With Children	**7,965**	20.4%	**6,593**	16.1%
Without Children	10,037	25.7%	10,384	25.4%
Female-Headed Households	**5,240**	**13.4%**	**5,395**	**13.2%**
With Children	**3,551**	**9.1%**	**3,794**	**9.3%**
Without Children	1,689	4.3%	1,601	3.9%
Male-Headed Household	1,569	4.0%	1,708	4.2%
With Children	**913**	2.3%	**821**	2.0%
Without Children	656	1.7%	887	2.2%
Households	14,313	36.6%	16,748	41.0%

Sources: Census 2000 (SF-3, H16); 2006-2010 American Community Survey (B11003)

Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower incomes and the unwillingness of some landlords to rent their units to families with children. In Davenport in 2010, female-headed households with children comprised 60.4% of families living in poverty, even though they comprised only 9.3% of all families. Among female-headed households with children, almost half (47.7%) were living in poverty in 2010, compared to 20.6% of male-headed households with children and 7.7% of married couples with children.

Female-headed households with children were six times more likely than married couples with children and more than twice as likely as male-headed households with children to live in poverty.

Almost one-half of female-headed households with children were living in poverty in 2010. By comparison, 20.6% of male-headed households with children and 7.7% of married couples with children were living in poverty.

In Moline, the proportion of female-headed households increased from 10.4% in 2000 to 11.3% in 2010, and female-headed households with children increased slightly from 6.7% to 6.9%. By comparison, married-couple family households with children declined from 20.2% to 18.0% of all households, and there was a decrease in the rate of male-headed households with children from 1.9% to 1.4% during this period.

Figure 2-13 provides more detailed data on familial status in Moline.

Figure2-13
Households by Type and Presence of Children in Moline, 2000-2010

	2000		2010	
	#	%	#	%
Total Households	**18,492**	**100.0%**	**18,238**	**100.0%**
Family Households	11,603	62.7%	11,538	63.3%
Married-couple family	9,018	48.8%	8,895	48.8%
With Children	3,739	20.2%	3,277	18.0%
Without Children	5,279	28.5%	5,618	30.8%
Female-Headed Households	**1,931**	**10.4%**	**2,060**	**11.3%**
With Children	**1,239**	**6.7%**	**1,251**	**6.9%**
Without Children	692	3.7%	809	4.4%
Male-Headed Household	654	3.5%	583	3.2%
With Children	355	1.9%	261	1.4%
Without Children	299	1.6%	322	1.8%
Households	6,889	37.3%	6,700	36.7%

Sources: Census 2000 (SF-3, H16); 2006-2010 American Community Survey (B11003)

Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower incomes and the unwillingness of some landlords to rent their units to families with children. In Moline in 2010, female-headed households with children comprised 49.6% of families living in poverty, even though they comprised only 6.9% of all families. Among female-headed households with children, more than one-fourth (28.5%) were living in poverty in 2010, compared to 9.4% of male-headed households with children and 5.9% of married couples with children.

Female-headed households with children were almost five times more likely than married couples with children and three times as likely as male-headed households with children to live in poverty.

More than one-fourth of female-headed households with children were living in poverty in 2010. By comparison, 9.4% of male-headed households with children and 5.9% of married couples with children were living in poverty.

In Rock Island, the proportion of female-headed households decreased from 14.2% in 2000 to 12.9% in 2010, and female-headed households with children decreased from 9.1% to 8.3%. By contrast, married-couple family households with children increased slightly from 15.3% to 15.7% of all households. There was also an increase in the rate of male-headed households with children from 2.0% to 2.6% during this period.

Figure 2-14 provides more detailed data on familial status in Rock Island.

Figure 2-14
Households by Type and Presence of Children in Rock Island, 2000-2010

	2000		2010	
	#	%	#	%
Total Households	**16,148**	**100.0%**	**15,536**	**100.0%**
Family Households	9,547	59.1%	9,035	58.2%
Married-couple family	6,650	41.2%	6,498	41.8%
With Children	2,477	15.3%	2,444	15.7%
Without Children	4,173	25.8%	4,054	26.1%
Female-Headed Households	**2,294**	**14.2%**	**2,004**	**12.9%**
With Children	**1,467**	**9.1%**	**1,287**	**8.3%**
Without Children	827	5.1%	717	4.6%
Male-Headed Household	603	3.7%	533	3.4%
With Children	326	2.0%	405	2.6%
Without Children	277	1.7%	128	0.8%
Households	6,601	40.9%	6,501	41.8%

Sources: Census 2000 (SF-3, H16); 2006-2010 American Community Survey (B11003)

Female-headed households with children often experience difficulty in obtaining housing, primarily as a result of lower incomes and the unwillingness of some landlords to rent their units to families with children. In Rock Island in 2010, female-headed households with children comprised 59.0% of families living in poverty, even though they comprised only 8.3% of all families. Among female-headed households with children, more than one-third (38.5%) were living in poverty in 2010, compared to 11.9% of male-headed households with children and 7.9% of married couples with children.

Female-headed households with children were almost five times more likely than married couples with children and more than three times as likely as male-headed households with children to live in poverty.

More than one-third of female-headed households with children were living in poverty in 2010. By comparison, 11.9% of male-headed households with children and 7.9% of married couples with children were living in poverty.

viii. Ancestry and Income

It is illegal to refuse the right to housing based on place of birth or ancestry. Census data on native and foreign-born populations estimates that, in 2010, 5.0% of Davenport residents, 10.0% of Moline residents, and 5.9% of Rock Island residents were foreign-born or were native citizens born outside of the United States. [1]

In all three cities, children with at least one foreign-born parent were much less likely to live in households earning less than 200% of the poverty rate than children with only native parents. In 2010, 4.9% of Davenport families with at least one foreign-born parent had household income less than 200% of the poverty, while 45.9% of families with children and only native-born parents were in this income category. The corresponding figures for Moline were 10.4% and 29.0%, and for Rock Island 10.3% and 31.7%. [2]

By comparison, Davenport children with only native parents were nine times more likely to live in households with incomes less than 200% of the poverty level than children with at least one foreign-born parent. In Moline and Rock Island, children with only native parents were about three times more likely to live in households with incomes less than 200% of the poverty level than children with at least one foreign-born parent.

Refugees represent a growing portion of the area's foreign-born population. A 2006 report released by the Brookings Institute estimates that 2,109 refugees were resettled in the Davenport-Moline-Rock Island metropolitan area between 1983 and 2004.[3]

The Brookings study also indicated that 1,049 refugees resettled in the Davenport-Moline-Rock Island metropolitan area in the 1990s. These refugees were 17.9% of the foreign-born residents who entered the area in the 1990s.

World Relief, a refugee settlement agency, estimates that approximately 100 refugee families resettle in the Quad City area annually. Most are from Africa and Asia. These refugees face numerous challenges with regard to housing choice. Stakeholders noted that refugee households may not have credit histories or references from previous landlords, thereby limiting their options in the rental market. Refugees also may have only limited information on their housing rights and what constitutes discrimination. In addition, refugee households tend to be larger and therefore may require three-, four-, and five-bedroom units, which are relatively sparse. Lastly, refugees are less likely to be fluent in English, making it more difficult to provide services to this population. No testing has been undertaken in the three cities to determine whether there is housing discrimination based on ancestry or place of birth.

Refugee populations face many challenges in acquiring and maintaining decent, affordable housing. These challenges include limited credit histories, lack of knowledge of housing rights, inadequate supply of housing suitable for large families, and limited English proficiency.

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[1] U.S. Census Bureau, 2006-2010 American Community Survey (B05002)

[2] U.S. Census Bureau, 2008-2010 American Community Survey (C05010)

[3] Audrey Singer and Jill H. Wilson (September 2006). "From 'There' to 'Here': Refugee Resettlement in Metropolitan America." Washington D.C.: The Brookings Institution.

ix. Persons with LEP

Persons with limited English proficiency (LEP) are defined as persons who have a limited ability to read, write, speak or understand English. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. It is also incumbent upon HUD entitlement communities to determine the need for language assistance and comply with Title VI of the Civil Rights Act of 1964.

American Community Survey (ACS) data reports on the non-English language spoken at home for the population five years and older. In 2010, there were 3,012 persons in Davenport who spoke English less than "very well", representing 3.3% of the city's population 5 years and older. Of these, 50% were native Spanish speakers, 26% were native Vietnamese speakers, and 2% were native Arabic speakers.

Figure 2-15
Language Spoken at Home by Ability to Speak English, Davenport, 2010

Language Group	Number of LEP Persons
Total	**3,012**
Spanish	1,503
Vietnamese	796
Arabic	71

Source: 2006-2010 American Community Survey (B16005)

In 2010, there were 2,908 persons with LEP in Moline. This was 7.2% of Moline's population age 5 and older. Of these, 72% were native Spanish speakers, 9% were native Vietnamese speakers, 3% were native Arabic speakers, and 2% spoke African languages.

Figure 2-16
Language Spoken at Home by Ability to Speak English, Moline, 2010

Language Group	Number of LEP Persons
Total	**2,908**
Spanish	2,086
Vietnamese	249
Arabic	80
African Languages	53

Source: 2006-2010 American Community Survey (B16005)

In 2010, there were 1,619 persons in Rock Island who had LEP, representing 4.4% of the city's population 5 years and older. Of these, 70% were native Spanish speakers, 9% were native speakers of Indic languages, and 1% spoke Vietnamese as their first language.

Figure 2-17
Language Spoken at Home by Ability to Speak English, Rock Island, 2010

Language Group	Number of LEP Persons
Total	**1,619**
Spanish	1,134
Other Indic Languages	139
Vietnamese	17

Source: 2006-2010 American Community Survey (B16005)

Stakeholder interviewees stated that more than 30 languages are spoken in area schools. However, Spanish was by far the language with the highest number (4,723) of persons with LEP.

The large number of native Spanish speakers with LEP in Davenport, Moline and Rock Island may experience restricted housing choice unless information about housing programs and services is available in Spanish.

x. Protected Class Status and Unemployment

According to the 2008-2010 American Community Survey, the unemployment rate was 5.5% in Iowa and 9.6% in Illinois. At the time of the ACS, the unemployment rate was 7.0% in Davenport, 7.8% in Moline and 7.7% in Rock Island.

In all three cities, the unemployment rates for Whites was lower (in some cases, much lower) than for Blacks and Hispanics. In Davenport, the unemployment rate for Whites was 6.6%, for Blacks it was 10.2%, and for Hispanics it was 10.8%. In Moline, the unemployment rate for Whites was 6.4% and 13.4% for Hispanics. (Unemployment data for Blacks in Moline was not available.) In Rock Island, the unemployment rate for Whites was 5.9%, for Blacks it was 10.8%, and for Hispanics it was 15.1%. Higher unemployment, whether temporary or permanent, means less income for housing expenses.

Unemployment rates for minorities are generally close to double the rates for White persons, with Black persons faring slightly better than Hispanic persons.

Figure 2-18
Civilian Labor Force, Iowa and Davenport, 2010

Davenport	Iowa Total	%	Davenport Total	%
Total Civilian Labor Force (CLF)	**1,652,755**	**100%**	**51,741**	**100%**
Employed	1,561,234	94.5%	48,109	93.0%
Unemployed	91,521	5.5%	3,632	7.0%
Male CLF	**863,044**	**100%**	**26,612**	**100%**
Employed	810,641	93.9%	**24,662**	92.7%
Unemployed	52,403	6.1%	**1,950**	7.3%
Female CLF	**789,711**	**100%**	**25,129**	**100%**
Employed	750,593	95.0%	23,447	93.3%
Unemployed	39,118	5.0%	1,682	6.7%
White CLF	**1,539,031**	**100%**	**44,779**	**100%**
Employed	1,459,595	94.8%	41,845	93.4%
Unemployed	79,436	5.2%	2,934	6.6%
Black CLF	**38,238**	**100%**	**4,226**	**100%**
Employed	32,557	85.1%	3,796	89.8%
Unemployed	5,681	14.9%	430	10.2%
Hispanic CLF	**65,746**	**100%**	**3,146**	**100%**
Employed	59,769	90.9%	2,807	89.2%
Unemployed	5,977	9.1%	339	10.8%

Source: U.S. Census Bureau, 2008-2010 American Community Survey (C23001, C23002A, C23002B, C23002D, C23002I)

Figure 2-19
Civilian Labor Force, Illinois and Moline, 2010

Moline	Illinois Total	%	Moline Total	%
Total Civilian Labor Force (CLF)	**6,692,260**	**100%**	**24,077**	**100%**
Employed	6,052,512	90.4%	22,197	92.2%
Unemployed	639,748	9.6%	1,880	7.8%
Male CLF	**3,515,801**	**100%**	**12,001**	**100%**
Employed	3,155,285	89.7%	**11,205**	93.4%
Unemployed	360,516	10.3%	**796**	6.6%
Female CLF	**3,176,459**	**100%**	**12,076**	**100%**
Employed	2,897,227	91.2%	10,992	91.0%
Unemployed	279,232	8.8%	1,084	9.0%
White CLF	**5,011,759**	**100%**	**20,084**	**100%**
Employed	4,613,373	92.1%	18,807	93.6%
Unemployed	398,396	7.9%	1,277	6.4%
Black CLF	**843,608**	**100%**	**N/A**	**100%**
Employed	686,203	81.3%	N/A	0.0%
Unemployed	157,405	18.7%	N/A	0.0%
Hispanic CLF	**969,819**	**100%**	**3,468**	**100%**
Employed	862,127	88.9%	3,004	86.6%
Unemployed	107,692	11.1%	464	13.4%

Source: U.S. Census Bureau, 2008-2010 American Community Survey (C23001, C23002A, C23002B, C23002D, C23002I)

Figure 2-20
Civilian Labor Force, Illinois and Rock Island, 2010

Rock Island	Illinois Total	%	Rock Island Total	%
Total Civilian Labor Force (CLF)	**6,692,260**	**100%**	**18,985**	**100%**
Employed	6,052,512	90.4%	17,532	92.3%
Unemployed	639,748	9.6%	1,453	7.7%
Male CLF	**3,515,801**	**100%**	**9,176**	**100%**
Employed	3,155,285	89.7%	**8,360**	91.1%
Unemployed	360,516	10.3%	**816**	8.9%
Female CLF	**3,176,459**	**100%**	**9,809**	**100%**
Employed	2,897,227	91.2%	9,172	93.5%
Unemployed	279,232	8.8%	637	6.5%
White CLF	**5,011,759**	**100%**	**14,731**	**100%**
Employed	4,613,373	92.1%	13,868	94.1%
Unemployed	398,396	7.9%	863	5.9%
Black CLF	**843,608**	**100%**	**2,661**	**100%**
Employed	686,203	81.3%	2,373	89.2%
Unemployed	157,405	18.7%	288	10.8%
Hispanic CLF	**969,819**	**100%**	**1,574**	**100%**
Employed	862,127	88.9%	1,337	84.9%
Unemployed	107,692	11.1%	237	15.1%

Source: U.S. Census Bureau, 2008-2010 American Community Survey (C23001, C23002A, C23002B, C23002D, C23002I)

B. Housing Market

i. Housing Inventory

Overall, the housing stock in Davenport, Moline and Rock Island grew by 3,981 units (5.1%) between 1990 and 2010, but this change was not uniform among the three cities. Davenport and Moline gained units (3,864 and 621 units, respectively), while Rock Island lost 504 units. Thus, Davenport accounted for 86% of the total units gained by it and Moline.

During the interviews conducted for the AI, it was noted that the developability and availability of land in the Davenport area facilitated the city's increase in residential units. By comparison, the topography on the Illinois side of the Mississippi River severely limits new development.

Figure 2-21
Trends in Housing Inventory, 1990-2010

City	1990	2000	2010	Change 1990-2010	
	#	#	#	#	%
Davenport	40,484	41,359	44,348	3,864	9.5%
Moline	19,235	19,495	19,856	621	3.2%
Rock Island	17,926	17,507	17,422	-504	-2.8%
Total:	77,645	78,361	81,626	3,981	5.1%

Source: U.S. Census Bureau

Figures 2-22, 2-23 and 2-24 contain census tract data on changes in the housing inventory for the three cities between 2000 and 2010. (NOTE: due to differences in data collection and sampling methods, the citywide data in these tables varies slightly from that in Figure 2-21 above.)

Among Davenport's census tracts that are Impacted Areas or include Impacted Areas, five census tracts (CT 106, CT 107, CT 108, CT 128.01 and CT 128.02) gained a total of 1,000 units. The remaining five census tracts that are Impacted Areas or include Impacted Areas (CT 109, CT 110, CT 113, CT 114 and CT 115) lost a total of 213 units.

Figure 2-22
Trends in Housing Units in Davenport, 2000-2010

Census Tract	2000 #	2000 % of Total Housing Units	2010 #	2010 % of Total Housing Units	Change 2000-2010 #	Change 2000-2010 %
City of Davenport	**41,350**	**100.0%**	**44,087**	**100.0%**	**2,737**	**6.6%**
101.01*	0	0.0%	2	0.0%	2	100.0%
102.02*	11	0.0%	9	0.0%	-2	-18.2%
103*	5	0.0%	4	0.0%	-1	-20.0%
106	1,275	3.4%	1,415	2.9%	140	11.0%
107	789	1.9%	798	1.8%	9	1.1%
108	1,096	3.0%	1,225	2.5%	129	11.8%
109	1,095	2.6%	1,056	2.5%	-39	-3.6%
110	1,140	2.7%	1,109	2.6%	-31	-2.7%
111	1,484	3.5%	1,445	3.4%	-39	-2.6%
112	987	2.3%	971	2.2%	-16	-1.6%
113	1,208	2.8%	1,140	2.7%	-68	-5.6%
114	1,270	3.0%	1,223	2.9%	-47	-3.7%
115	1,144	2.7%	1,116	2.6%	-28	-2.4%
116	1,628	3.7%	1,548	3.7%	-80	-4.9%
117	1,476	3.5%	1,455	3.3%	-21	-1.4%
118	1,149	2.8%	1,164	2.6%	15	1.3%
119	1,241	2.9%	1,219	2.8%	-22	-1.8%
120	1,546	3.7%	1,540	3.5%	-6	-0.4%
121	1,603	3.9%	1,616	3.6%	13	0.8%
122	975	2.3%	968	2.2%	-7	-0.7%
123	784	1.8%	738	1.8%	-46	-5.9%
124	655	1.5%	636	1.5%	-19	-2.9%
125.01	1,619	4.2%	1,749	3.7%	130	8.0%
125.02	1,158	3.9%	1,616	2.6%	458	39.6%
126.01	2,016	5.1%	2,119	4.6%	103	5.1%
126.02	1,567	4.1%	1,715	3.6%	148	9.4%
127.01	1,175	3.2%	1,307	2.7%	132	11.2%
127.02	1,232	3.7%	1,545	2.8%	313	25.4%
128.01	1,603	4.5%	1,881	3.6%	278	17.3%
128.02	1,995	5.9%	2,439	4.5%	444	22.3%
129.01	934	4.4%	1,831	2.1%	897	96.0%
129.02	2,030	5.5%	2,260	4.6%	230	11.3%
130	2,601	5.7%	2,366	5.9%	-235	-9.0%
131	859	2.1%	862	1.9%	3	0.3%

Note: Shading indicates Impacted Areas
Source: 2000 and 2010 U.S. Census (H 001 and H1)

In Moline, there are five census tracts that are Impacted Areas or include Impacted Areas. Four of these five census tracts (CT 213 [part], CT 217, CT 222 and CT 240 [part]) gained 145 units, while the remaining census tract (CT 223 [part]) lost 81 units.

Figure 2-23
Trends in Housing Units in Moline, 2000-2010

Census Tract	2000 #	2000 % of Total Housing Units	2010 #	2010 % of Total Housing Units	Change 2000-2010 #	Change 2000-2010 %
City of Moline	**19,487**	**100.0%**	**19,856**	**100.0%**	**369**	**1.9%**
210 (part)	33	0.0%	16	0.1%	-17	-51.5%
211 (part)	1,250	3.6%	1,504	2.8%	254	20.3%
212 (part)	2,246	5.5%	2,279	5.1%	33	1.5%
213 (part)	2,134	5.2%	2,145	4.8%	11	0.5%
214 (part)	545	1.4%	567	1.2%	22	4.0%
215	1,977	4.8%	1,991	4.5%	14	0.7%
216	1,167	2.9%	1,180	2.6%	13	1.1%
217	1,808	4.4%	1,827	4.1%	19	1.1%
218 (part)	2,210	5.4%	2,225	5.0%	15	0.7%
219 (part)	530	1.2%	480	1.2%	-50	-9.4%
220 (part)	1,653	4.0%	1,658	3.7%	5	0.3%
221	1,283	3.1%	1,293	2.9%	10	0.8%
222	1,633	4.2%	1,731	3.7%	98	6.0%
223 (part)	977	2.2%	896	2.2%	-81	-8.3%
240 (part)	0	0.0%	17	0.0%	17	100.0%
241.01 (part)	5	0.0%	0	0.0%	-5	-100.0%
243 (part)	36	0.1%	47	0.1%	11	30.6%

Note: Shading indicates Impacted Areas

Source: 2000 and 2010 U.S. Census (H 001 and H1)

Among Rock Island's seven census tracts that are Impacted Areas or include Impacted Areas, three census tracts (CT 226, CT 241.02 [part] and CT 244) gained a total of 84 units. The remaining four census tracts that are Impacted Areas or include Impacted Areas (CT 228, CT 233, CT 236 and CT 245 [part]) lost a total of 116 units.

Figure 2-24
Trends in Housing Units in Rock Island, 2000-2010

Census Tract	2000 #	2000 % of Total Housing Units	2010 #	2010 % of Total Housing Units	Change 2000-2010 #	Change 2000-2010 %
City of Rock Island	**17,542**	**100.0%**	**17,422**	**100.0%**	**-120**	**-0.7%**
226	1,106	2.8%	1,165	2.5%	59	5.3%
228	1,095	2.5%	1,047	2.5%	-48	-4.4%
229	1,806	4.2%	1,734	4.1%	-72	-4.0%
230 (part)	1,380	3.3%	1,375	3.1%	-5	-0.4%
231 (part)	1,781	4.4%	1,829	4.0%	48	2.7%
232	1,119	2.8%	1,156	2.5%	37	3.3%
233	2,536	6.1%	2,525	5.8%	-11	-0.4%
235	1,704	3.8%	1,584	3.9%	-120	-7.0%
236	907	2.1%	878	2.1%	-29	-3.2%
237	844	2.0%	814	1.9%	-30	-3.6%
241.02 (part)	1,029	2.5%	1,051	2.3%	22	2.1%
242 (part)	321	0.8%	342	0.7%	21	6.5%
243	769	1.9%	802	1.7%	33	4.3%
244	48	0.1%	51	0.1%	3	6.3%
245 (part)	1,097	2.6%	1,069	2.5%	-28	-2.6%

Note: Shading indicates Impacted Areas

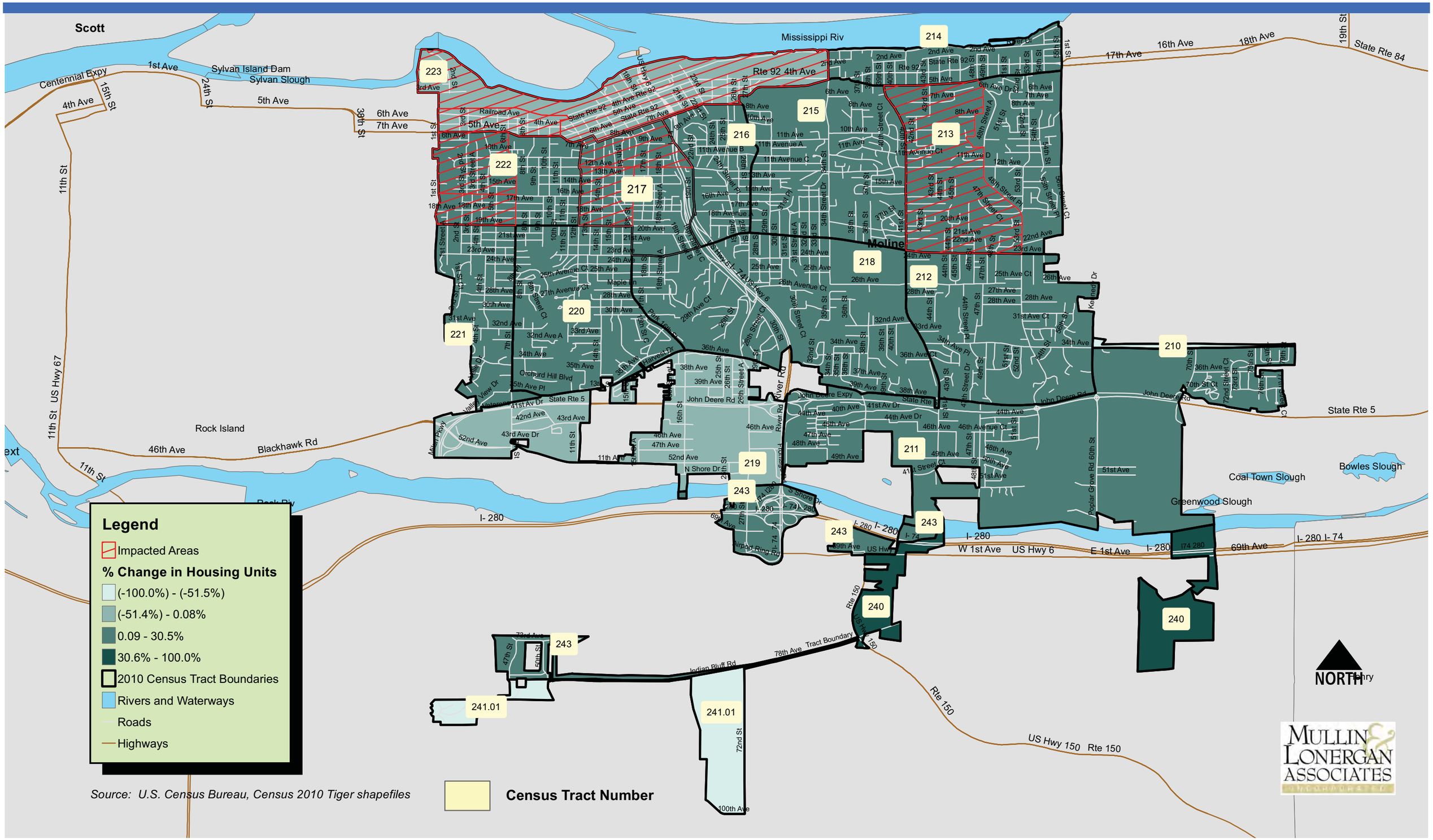
Source: 2000 and 2010 U.S. Census (H 001 and H1)

In Davenport and Moline, census tracts that are Impacted Areas or include Impacted Areas gained housing units between 2000-2010.

Maps 2-16, 2-17 and 2-18 depict the locations of the changes in total housing units in the three cities.

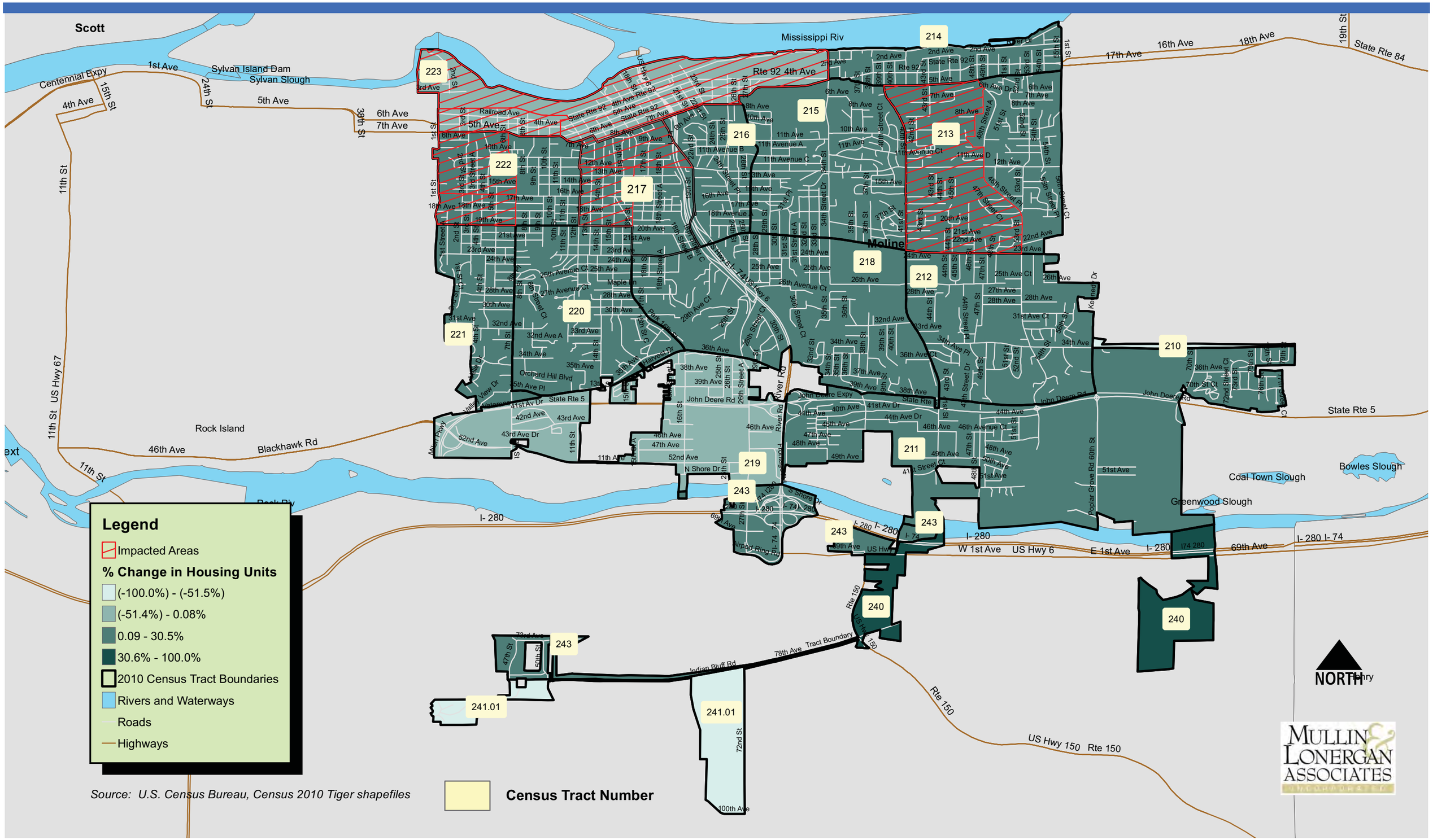
Map 2-17: Change in Total Housing Units: City of Moline, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



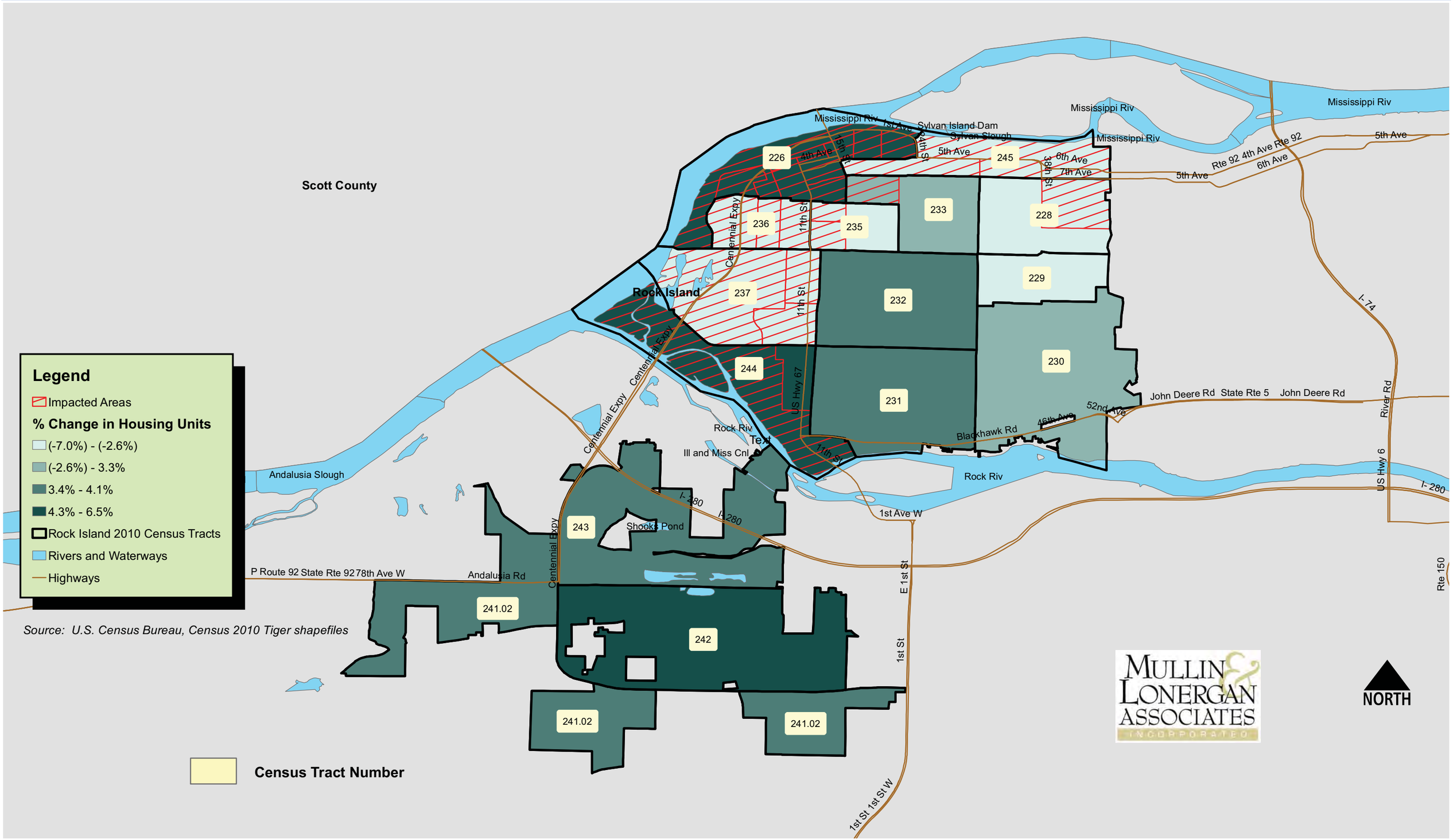
Map 2-17: Change in Total Housing Units: City of Moline, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



Map 2-18: Change in Total Housing Units, 2000 - 2010: City of Rock Island, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



ii. Types of Housing Units

The 2010 U.S. Census data reported that there were a total of 81,444 occupied housing units in Davenport, Moline, and Rock Island. Of these, 21,552 (26.5%) were multi-family units, 58,122 (71.4%) were single-family units, and 1,662 (2.0%) were mobile homes.

Figure 2-25 provides data on types of housing units in the three cities. The composition of the housing stock in the cities varies slightly. Moline has the highest percentage of single-family units (75.4%), followed by Rock Island (73.9%) and Davenport (68.6%). Correspondingly, Davenport has the highest percentage of multi-family units (28.8%), followed by Rock Island (25.2%) and Moline (22.3%).

Figure 2-25
Units in Structure by City, 1990-2010

	Total Units	Single-family units (detached and	Multi-family units					Mobile home
			2 to 4	5 to 9	10 to 19	20 or more	Total	
Davenport	44,348	30,411	4,152	2,801	2,999	2,819	12,771	1,166
Moline	19,907	15,004	2,017	1,008	643	781	4,449	346
Rock Island	17,189	12,707	1,778	746	493	1,315	4,332	150
Total:	81,444	58,122	7,947	4,555	4,135	4,915	21,552	1,662

Source: U.S. Census Bureau, Census 2010 (B25024)

Figures 2-26, 2-27 and 2-28 contain data on types of housing units in each of the three cities in 2010. Maps 2-19, 2-20 and 2-21 illustrate concentrations of multi-family housing in each city in 2010.

In Davenport in 2010, 28.8% of the City's residential structures were multi-family structures. There were four census tracts in which the majority of residential structures were multi-family structures. These census tracts and the percentages of their housing stock that had multi-family units were CT 106 (62.1%), CT 107 (54.1%), CT 109 (70.9%) and CT 128.02 (62.6%). Census Tracts 106, 107 and 109 are Impacted Areas, and Census Tract 128.02 includes an Impacted Area.

In 2010, 22.9% of Moline's housing stock was multi-family structures. Two census tracts had a majority of residential structures that were multi-family units. CT 210's housing stock was 74.4% multi-family, as was 61.5% of CT 223's housing stock. Both of these census tracts are Impacted Areas.

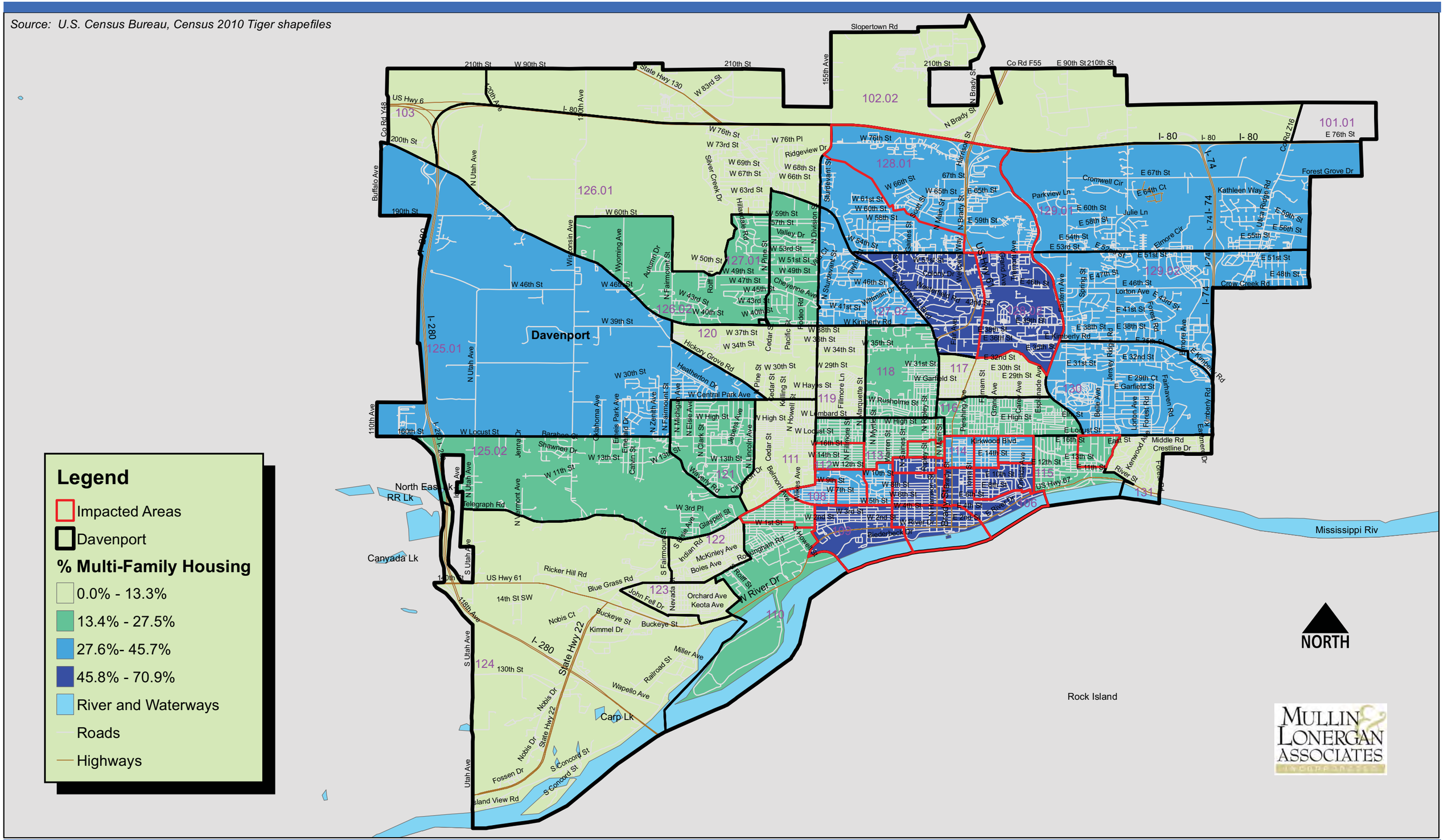
In Rock Island in 2010, 25.2% of the City's residential structures were multi-family structures. There were three census tracts in which the majority of residential structures were multi-family structures. These census tracts and the percentage of their housing stock that had multi-family units were CT 226 (51.5%), CT 241.02 [part] (69.8%) and CT 245 [part] (62.0%). Census Tracts 226 and CT 245 are Impacted Areas.

In Davenport, Moline and Rock Island in 2010, higher percentages of multi-family housing were most often located in Impacted Areas.

For example, 49% of Davenport's multi-family housing stock was located in Impacted Areas, as was 45% of Moline's multi-family units and 69% of Rock Island's multi-family housing.

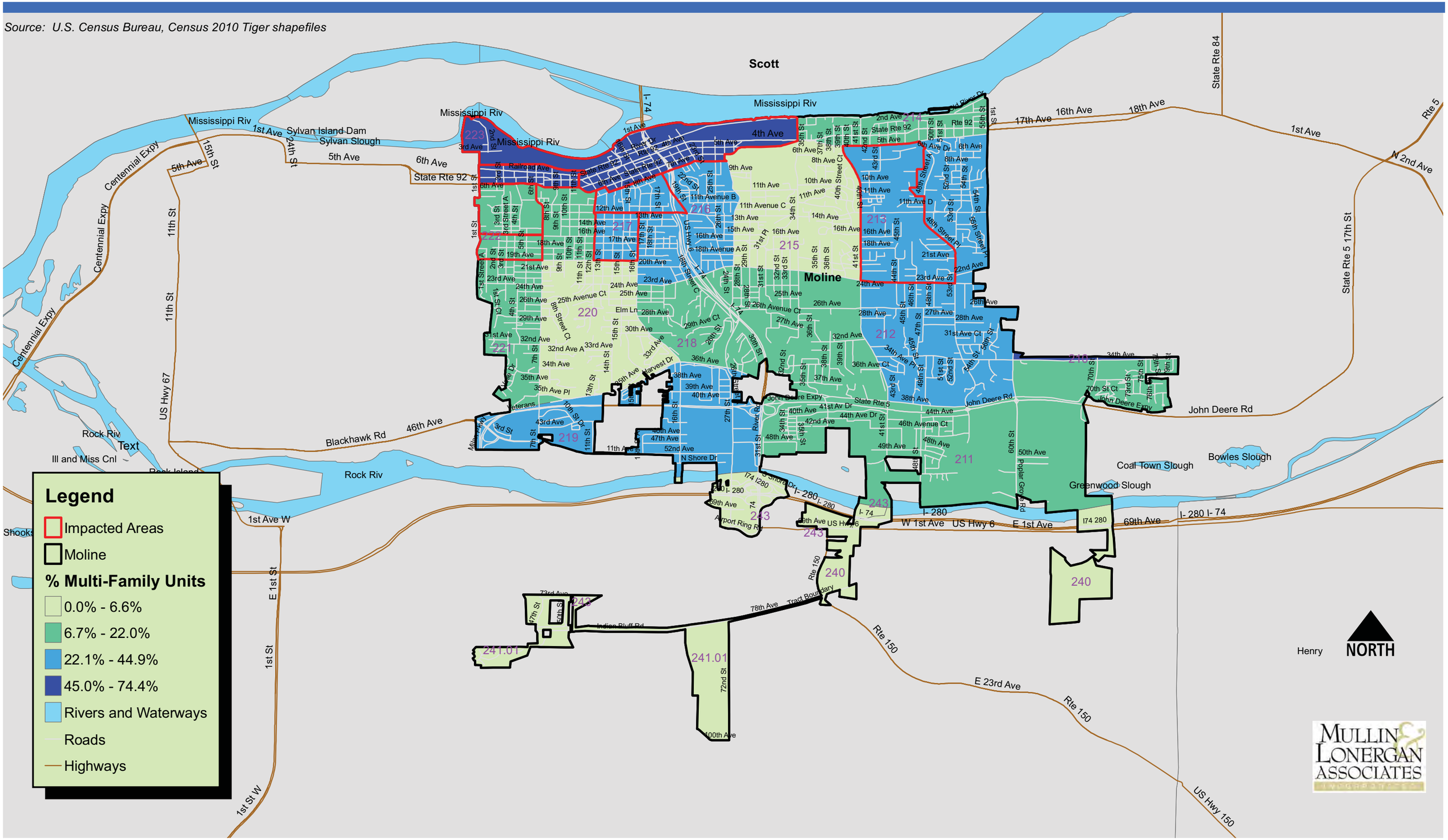
Map 2-19: Percentage of Multi-Family Housing: City of Davenport, Iowa

Analysis of Impediments to Fair Housing Choice, 2012



Map 2-20: Percentage of Multi-Family Housing: City of Moline, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



Map 2-21: Multi-Family Housing: City of Rock Island, Illinois

Analysis of Impediments to Fair Housing Choice, 2012

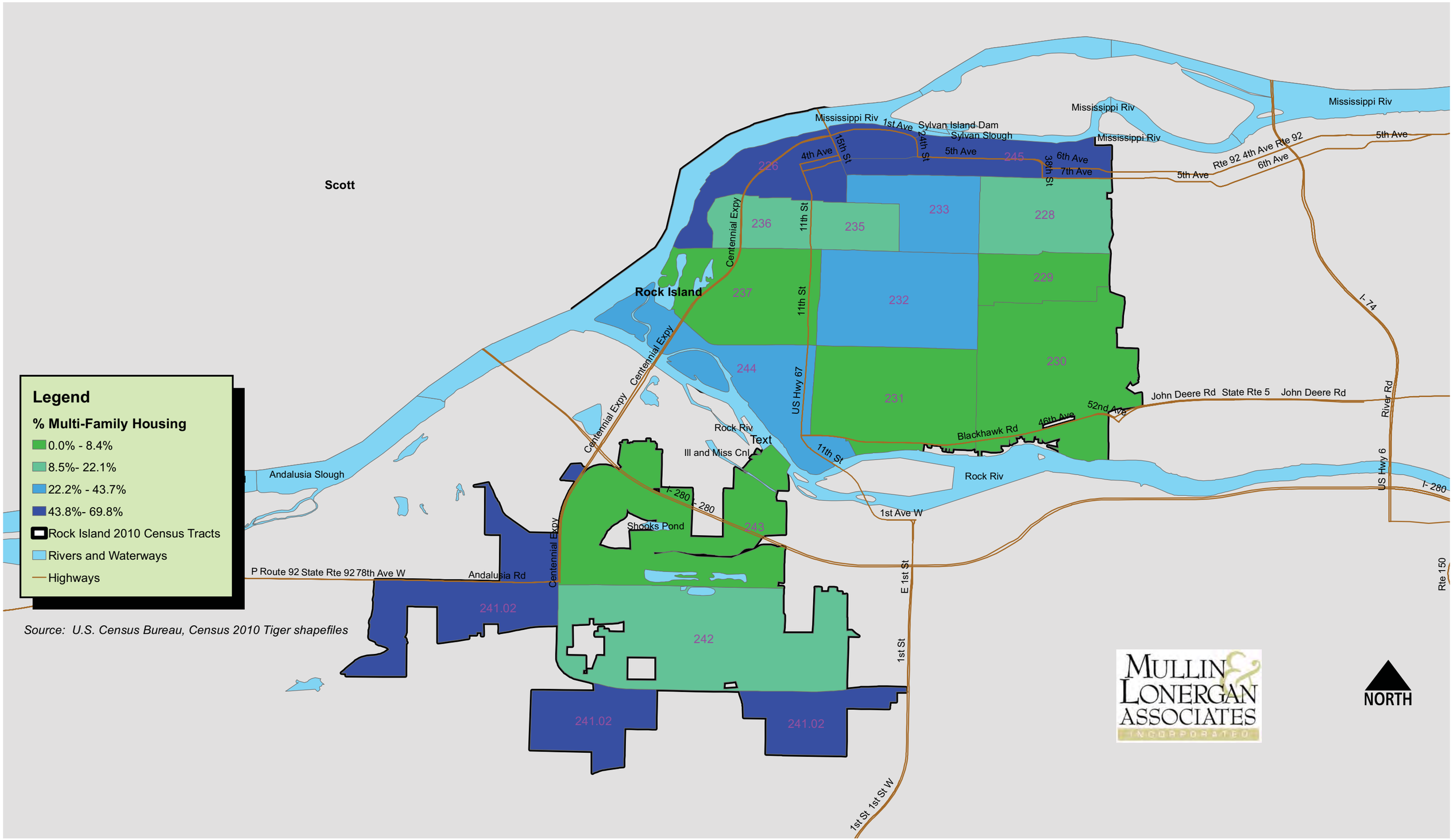


Figure 2-26
Units by Structure in Davenport in 2010

Census Tract	Total Units	Single-family units (detached and attached)	Multi-family units					Mobile home & RVs
			2 to 4	5 to 9	10 to 19	20 or more	Total	
Davenport	**44,348**	**30,411**	**4,152**	**2,801**	**2,999**	**2,819**	**12,771**	**1,166**
101.01	0	0	0	0	0	0	0	0
102.02	0	0	0	0	0	0	0	0
103	0	0	0	0	0	0	0	0
106	1,494	566	479	97	151	201	928	0
107	796	365	223	111	97	0	431	0
108	1,220	777	220	41	45	121	427	16
109	1,187	345	142	43	47	610	842	0
110	1,109	847	220	34	0	0	254	8
111	1,434	1340	81	0	0	0	81	13
112	1,044	756	197	41	37	13	288	0
113	1,198	964	125	87	9	13	234	0
114	1,288	699	482	71	23	13	589	0
115	1,190	902	200	35	25	28	288	0
116	1,573	1204	304	65	0	0	369	0
117	1,459	1317	90	10	9	0	109	33
118	1,187	933	101	83	0	70	254	0
119	1,227	1110	19	20	78	0	117	0
120	1,529	1282	99	92	0	13	204	43
121	1,596	1318	30	0	198	38	266	12
122	946	858	37	33	18	0	88	0
123	737	716	0	0	21	0	21	0
124	606	442	0	0	0	0	0	164
125.01	1,755	1012	139	188	178	29	534	209
125.02	1,451	1048	46	141	60	84	331	72
126.01	2,175	1726	165	87	23	0	275	174
126.02	1,665	914	172	78	36	51	337	414
127.01	1,331	1031	40	73	36	151	300	0
127.02	1,489	937	48	73	104	327	552	0
128.01	1,985	1199	126	298	266	96	786	0
128.02	2,456	911	144	383	590	420	1,537	8
129.01	1,572	895	126	320	134	97	677	0
129.02	2,315	1495	41	117	394	268	820	0
130	2,492	1698	18	180	420	176	794	0
131	842	804	38	0	0	0	38	0

Note: Shading indicates Impacted Areas

Source: U.S. Census Bureau, Census 2010 (B25024)

Figure 2-27
Units by Structure in Moline in 2010

Census Tract	Total Units	Single-family units (detached and attached)	Multi-family units					Mobile home & RVs
			2 to 4	5 to 9	10 to 19	20 or more	Total	
Moline	**19,907**	**15,004**	**2,017**	**1,008**	**643**	**889**	**4,557**	**346**
210	39	10	29	0	0	0	29	0
211	1,395	895	54	5	178	49	286	214
212	2,299	1405	186	244	204	260	894	0
213	2,160	1582	135	214	72	157	578	0
214	599	521	32	9	37	0	78	0
215	2,010	1967	11	24	0	0	35	8
216	1,158	842	205	10	6	95	316	0
217	1,816	1304	239	55	45	163	502	10
218	2,203	1869	156	128	0	50	334	0
219	494	257	49	145	10	18	222	15
220	1,707	1594	90	23	0	0	113	0
221	1,335	1101	56	90	44	32	222	12
222	1,651	1287	306	11	38	9	364	0
223	950	361	469	50	9	56	584	5
240	23	0	0	0	0	0	0	23
241.01	0	0	0	0	0	0	0	0
243	68	9	0	0	0	0	0	59

Note: Shading indicates Impacted Areas

Source: U.S. Census Bureau, Census 2010 (B25024)

Figure 2-28
Units by Structure in Rock Island in 2010

Census Tract	Total Units	Single-family units (detached and attached)	Multi-family units					Mobile home & RVs
			2 to 4	5 to 9	10 to 19	20 or more	Total	
Rock Island	**17,189**	**12,707**	**1,778**	**746**	**493**	**1,315**	**4,332**	**150**
226	1,159	534	120	40	45	392	597	28
228	1,797	1400	340	57	0	0	397	0
229	1,375	1261	68	46	0	0	114	0
230 (part)	1,807	1730	48	19	10	0	77	0
231 (part)	1,085	1043	30	12	0	0	42	0
232	2,419	1680	115	106	225	293	739	0
233	1,710	1162	442	86	20	0	548	0
235	936	766	78	43	0	41	162	8
236	744	605	81	15	26	17	139	0
237	1,001	916	14	62	0	9	85	0
241.02 (part)	341	103	92	57	67	22	238	0
242 (part)	725	501	11	79	0	20	110	114
243	37	37	0	0	0	0	0	0
244	1,035	582	81	68	80	224	453	0
245 (part)	1,018	387	258	56	20	297	631	0

Note: Shading indicates Impacted Areas

Source: U.S. Census Bureau, Census 2010 (B25024)

iii. Condition of Housing Units

Census data regarding the condition of housing units is limited.[1] One general measure of housing stock condition is the vacancy rate. In 2010, 3,467 of Davenport's 44,087 housing units were vacant, i.e., a vacancy rate of 7.9%. Davenport comprises 34 complete or partial census tracts. Of the 13 complete or partial census tracts that had vacancy rates that exceeded the City's overall vacancy rate, eight were located in census tracts that were Impacted Areas or included Impacted Areas.

Figure 2-29 contains data regarding housing unit vacancy rates in Davenport by census tracts.

[1] Davenport, Moline and Rock Island are comprised of census tracts and parts of census tracts, i.e., split census tracts that are partially in one of the three cities and partially in some other municipality. Census data on housing conditions is available on a census tract level, but this data cannot be extracted to include only those parts of split census tracts that are within the three cities. Instead, this data reflects the data for the entire split census tracts, both the portions within the three cities and the portions within other municipalities.

Figure 2-29
Housing Unit Vacancy Rates in Davenport in 2010

Census Tract	Occupancy Status			
	Total	Occupied	Vacant	% Vacant
City of Davenport	**44,087**	**40,620**	**3,467**	**7.86%**
101.01 (part)	2	2	0	0.0%
102.02 (part)	9	8	1	11.1%
103 (part)	4	4	0	0.0%
106	1415	1091	324	22.9%
107	798	588	210	26.3%
108	1225	1091	134	10.9%
109	1056	905	151	14.3%
110	1109	1003	106	9.6%
111	1445	1396	49	3.4%
112	971	895	76	7.8%
113	1140	1043	97	8.5%
114	1223	993	230	18.8%
115	1116	974	142	12.7%
116	1548	1407	141	9.1%
117	1455	1358	97	6.7%
118	1164	1108	56	4.8%
119	1219	1159	60	4.9%
120	1540	1452	88	5.7%
121	1616	1542	74	4.6%
122	968	889	79	8.2%
123	738	697	41	5.6%
124 (part)	636	585	51	8.0%
125.01	1749	1647	102	5.8%
125.02 (part)	1616	1515	101	6.3%
126.01	2119	2010	109	5.1%
126.02	1715	1586	129	7.5%
127.01	1307	1245	62	4.7%
127.02	1545	1463	82	5.3%
128.01	1881	1787	94	5.0%
128.02	2439	2302	137	5.6%
129.01	1831	1711	120	6.6%
129.02	2260	2060	200	8.8%
130	2366	2279	87	3.7%
131	862	825	37	4.3%

Note: Shading indicates Impacted Areas

Source: U.S. Census Bureau, Census 2010 (B25024)

In Moline, 1,283 of the City's 19,856 housing units were vacant – a 6.5% vacancy rate. Of the 17 complete or partial census tracts that make up Moline, six had vacancy rates greater than the City's overall rate. All six of these areas were located in census tracts that were Impacted Areas or included Impacted Areas.

Figure 2-30 contains data regarding housing unit vacancy rates in Moline by census tract.

Figure 2-30
Housing Unit Vacancy Rates in Moline in 2010

Census Tract	Occupancy Status			
	Total	Occupied	Vacant	% Vacant
City of Moline	**19,856**	**18,573**	**1,283**	**6.46%**
210 (part)	16	16	0	0.0%
211 (part)	1504	1385	119	7.9%
212 (part)	2279	2181	98	4.3%
213 (part)	2145	2071	74	3.4%
214 (part)	567	528	39	6.9%
215	1991	1907	84	4.2%
216	1180	1106	74	6.3%
217	1827	1652	175	9.6%
218 (part)	2225	2107	118	5.3%
219 (part)	480	451	29	6.0%
220 (part)	1658	1564	94	5.7%
221	1293	1234	59	4.6%
222	1731	1521	210	12.1%
223 (part)	896	793	103	11.5%
240 (part)	17	17	0	0.0%
241.01 (part)	0	0	0	0.0%
243 (part)	47	40	7	14.9%

Note: Shading indicates Impacted Areas

Source: U.S. Census Bureau, Census 2010 (B25024)

In 2012, 1,492 of Rock Island's 17,422 housing units were vacant – an 8.6% vacancy rate. Rock Island comprises 24 complete or partial census tracts. All five complete or partial census tracts that had vacancy rates that exceeded the City's overall vacancy rate were located in census tracts that were Impacted Areas or included Impacted Areas.

Figure 2-31 contains data regarding housing unit vacancy rates in Rock Island by census tract.

Figure 2-31
Housing Unit Vacancy Rates in Rock Island in 2010

Census Tract	Occupancy Status			
	Total	Occupied	Vacant	% Vacant
City of Rock Island	**17,422**	**15,930**	**1,492**	**8.56%**
226	1165	954	211	18.1%
228	1734	1615	119	6.9%
229	1375	1304	71	5.2%
230 (part)	1829	1758	71	3.9%
231 (part)	1156	1108	48	4.2%
232	2525	2361	164	6.5%
233	1584	1381	203	12.8%
235	878	733	145	16.5%
236	814	700	114	14.0%
237	1051	971	80	7.6%
241.02 (part)	342	327	15	4.4%
242 (part)	802	775	27	3.4%
243	51	48	3	5.9%
244	1069	990	79	7.4%
245 (part)	1047	905	142	13.6%

Note: Shading indicates Impacted Areas

Source: U.S. Census Bureau, Census 2010 (B25024)

In Davenport, Moline and Rock Island in 2010, higher percentages of vacant housing units were most often located in Impacted Areas.

For example, 47% of Davenport's vacant housing units was located in Impacted Areas, as was 44% of Moline's vacant units and 59% of Rock Island's vacant units.

Census data also includes other information related to the condition of the housing stock. This includes data on units lacking complete plumbing facilities, overcrowded units (i.e., units with more than one occupant per room), and age of structure. Units that lack complete plumbing facilities (at least one full bathroom) are substandard housing.

Overcrowded units lead to increased wear-and-tear on housing stock. The age of a housing unit does not, in and of itself, indicate whether a unit is substandard. But older units tend to need more rehabilitation and maintenance than new units, and thus age of structures is a general indicator of a probable need for action to maintain housing stock.

In 2010, only 44 (0.1%) of Davenport's 40,828 housing units lacked complete plumbing facilities, and 605 units (1.5%) were overcrowded. A little more than one-third (34.1%) of the City's housing units were built before 1950.

Figure 2-32
Davenport Housing Conditions, 2010

Census Tract	Total Units	Lacking Complete Plumbing Facilities	%	1.01 or More Occupants per Room (Overcrowding)	%	Built Before 1950	%
Davenport	**40,828**	**44**	0.1%	**605**	1.5%	**13,929**	34.1%
101.01 (part)	0	0	0.0%	0	0.0%	0	0.0%
102.02 (part)	0	0	0.0%	0	0.0%	0	0.0%
103 (part)	0	0	0.0%	0	0.0%	0	0.0%
106	1,098	0	0.0%	18	1.6%	715	65.1%
107	622	0	0.0%	0	0.0%	0	0.0%
108	1,070	0	0.0%	29	2.7%	877	82.0%
109	1,033	0	0.0%	57	5.5%	579	56.1%
110	1,036	0	0.0%	24	2.3%	898	86.7%
111	1,405	0	0.0%	10	0.7%	808	57.5%
112	957	0	0.0%	0	0.0%	712	74.4%
113	1,095	18	1.6%	29	2.6%	795	72.6%
114	1,003	0	0.0%	10	1.0%	773	77.1%
115	1,038	0	0.0%	32	3.1%	790	76.1%
116	1,446	0	0.0%	13	0.9%	1272	88.0%
117	1,396	0	0.0%	0	0.0%	1145	82.0%
118	1,136	0	0.0%	0	0.0%	726	63.9%
119	1,151	0	0.0%	0	0.0%	342	29.7%
120	1,456	0	0.0%	8	0.5%	119	8.2%
121	1,514	0	0.0%	0	0.0%	158	10.4%
122	946	0	0.0%	10	1.1%	621	65.6%
123	710	0	0.0%	37	5.2%	298	42.0%
124 (part)	563	0	0.0%	0	0.0%	136	24.2%
125.01	1,726	17	1.0%	130	7.5%	89	5.2%
125.02 (part)	1,405	0	0.0%	0	0.0%	210	14.9%
126.01	2,010	0	0.0%	0	0.0%	178	8.9%
126.02	1,647	0	0.0%	10	0.6%	132	8.0%
127.01	1,182	0	0.0%	63	5.3%	125	10.6%
127.02	1,352	9	0.7%	13	1.0%	76	5.6%
128.01	1,849	0	0.0%	35	1.9%	118	6.4%
128.02	2,167	0	0.0%	22	1.0%	226	10.4%
129.01	1,484	0	0.0%	26	1.8%	0	0.0%
129.02	2,161	0	0.0%	0	0.0%	43	2.0%
130	2,390	0	0.0%	29	1.2%	373	15.6%
131	780	0	0.0%	0	0.0%	595	76.3%

Note: Shading indicates Impact Areas
Source: 2000 and 2010 U.S. Census (H 001 and H1)

Figure 2-32 contains data on Davenport housing units that lack complete plumbing facilities, are overcrowded, and are at least 60 years old. There are three census tracts (CT 113, CT 125.01 and CT 128.01) that have housing units that lack complete plumbing. About 73% of the housing units in CT 113 were built before 1950, and 18 of the city's 44 housing units that lack complete plumbing are located in CT 113. Interestingly, the remaining 26 units without complete plumbing are located in CT 125.01 and CT 128.01, where the percentages of housing units built before 1950 are just 5.2% and 10.4%, respectively.

There are 16 census tracts in which the percentage of housing units built before 1950 exceeds the city's overall rate for housing units built before 1950. Of these 16 census tracts, eight (CT 106, CT 108, CT 109, CT 110, CT 112, CT 113, CT 114 and CT 115) are Impacted Areas.

Nineteen Davenport census tracts included overcrowded units. The percentage of overcrowded units in these census tracts ranges from 0.1% to 7.5%. The census tracts with more than 5% overcrowded units are CT 109, CT 123, CT 125.01 and CT 127.01. Census tract 109 has 57 overcrowded units, which is 5.5% of its units. Census tract 123 has 37 overcrowded units (5.2% of its stock). Census tract 125.01 has 130 overcrowded units (7.5% of its units), and Census tract 127.01 has 63 units (5.3% of its stock). Only one of these census tracts (CT109) is an Impacted Area.

Although Davenport's Impacted Areas contain 29% of the city's housing units, these units comprise 41% of the city's units that lack complete plumbing, are overcrowded and were built before 1950.

In 2010, only 22 of Moline's 25,062 housing units lacked complete plumbing facilities, and 338 units (1.3%) were overcrowded. A little more than one-third (36.8%) of the city's housing units were built before 1950.

Figure 2-33
Moline Housing Conditions, 2010

Census Tract	Total Units*	Lacking Complete Plumbing Facilities	%	1.01 or More Occupants per Room (Overcrowding)	%	Built Before 1950	%
Moline	**25,062**	**22**	0.1%	**338**	1.3%	**9,224**	36.8%
210 (part)	1,795	0	0.0%	50	0.0%	91	5.1%
211 (part)	1,500	0	0.0%	0	0.0%	120	8.0%
212 (part)	2,019	0	0.0%	15	0.0%	301	14.9%
213 (part)	2,212	0	0.0%	12	0.5%	673	30.4%
214 (part)	599	0	0.0%	9	1.5%	430	71.8%
215	1,938	0	0.0%	10	0.5%	1064	54.9%
216	1,037	11	1.1%	60	5.8%	737	71.1%
217	1,624	0	0.0%	62	3.8%	1165	71.7%
218 (part)	2,063	11	0.5%	0	0.0%	525	25.4%
219 (part)	781	0	0.0%	7	0.9%	234	30.0%
220 (part)	1,618	0	0.0%	0	0.0%	1117	69.0%
221	1,263	0	0.0%	0	0.0%	437	34.6%
222	1,453	0	0.0%	85	5.8%	1115	76.7%
223 (part)	752	0	0.0%	7	0.9%	553	73.5%
240 (part)	1,623	0	0.0%	21	1.3%	115	7.1%
241.01 (part)	1,543	0	0.0%	0	0.0%	151	9.8%
243 (part)	1,242	0	0.0%	0	0.0%	396	31.9%

** Note: The totals are higher than the total for the partial census tracts due census methodology*

***Note: Shading indicates Impact Areas*

Source: 2000 and 2010 U.S. Census (H 001 and H1)

Figure 2-33 contains data on Moline housing units that lack complete plumbing facilities, are overcrowded, and are at least 60 years old. There are just two census tracts (CT 216 and CT 218) that have any housing units that lack complete plumbing. Neither of these census tracts is an Impacted Area.

There are seven census tracts in which the percentage of housing units built before 1950 exceeds Moline's overall rate for housing units built before 1950 (36.8%). Of these seven census tracts, two (CT 222 and CT 223) are Impacted Areas or partially Impacted Areas.

Four Moline census tracts included a percentage of overcrowded units that exceeded the city's overall rate for overcrowded units of 1.3%. The percentage of overcrowded units in these census tracts ranges from 1.5% to 5.8%. The only census tracts with more than 5%

overcrowded units are CT 216 and CT 222, where overcrowded units are 5.8% of all units in each census tract. Only CT 222 is an Impacted Area.

Moline's Impacted Areas contain 31% of the city's housing units, including 55% of the city's overcrowded units and 39% of the city's housing built before 1950.

In 2010, 62 of Rock Island's 19,687 housing units lacked complete plumbing facilities, 221 units (1.1%) were overcrowded, and almost 43% of the city's housing units were built before 1950.

Figure 2-34
Rock Island Housing Conditions, 2010

Census Tract	Total Units*	Lacking Complete Plumbing Facilities	%	1.01 or More Occupants per Room (Overcrowding)	%	Built Before 1950	%
Rock Island	**19,687**	**62**	0.3%	**221**	1.1%	**8,363**	42.5%
226	948	0	0.0%	0	0.0%	641	67.6%
228	1,724	0	0.0%	37	0.0%	1256	72.9%
229	1,283	0	0.0%	0	0.0%	592	46.1%
230 (part)	1,736	0	0.0%	0	0.0%	178	10.3%
231 (part)	1,064	0	0.0%	11	1.0%	286	26.9%
232	2,196	0	0.0%	0	0.0%	909	41.4%
233	1,449	0	0.0%	16	1.1%	1102	76.1%
235	784	7	0.9%	25	3.2%	609	77.7%
236	661	0	0.0%	32	4.8%	449	67.9%
237	875	0	0.0%	18	2.1%	469	53.6%
241.02 (part)	2,022	7	0.3%	18	0.9%	416	20.6%
242 (part)	1,848	27	1.5%	38	2.1%	146	7.9%
243	1,242	0	0.0%	0	0.0%	396	31.9%
244	975	0	0.0%	10	1.0%	487	49.9%
245 (part)	880	21	2.4%	16	1.8%	427	48.5%

** Note: The totals are higher than the total for the partial census tracts due census methodology*

***Note: Shading indicates Impact Areas*

Source: 2000 and 2010 U.S. Census (H 001 and H1)

Figure 2-34 contains data on Rock Island's housing units that lack plumbing facilities, are overcrowded, and are at least 60 years old. There are four census tracts (CT 235, CT 241.02, CT 242 and CT 245) that have any housing units that lack complete plumbing. Only CT 245 is an Impacted Area.

Interestingly, CT 242 is the census tract with the most units without plumbing (27), but it has the lowest percentage of housing units built before 1950 (7.9%).

There are nine Rock Island census tracts in which the percentage of housing units built before 1950 exceeds the City's overall rate for housing units built before 1950 (42.5%). Of these census tracts, eight (CT 226, CT 228, CT 233, CT 235, CT 236, CT 237, CT 244 and CT 245) are Impacted Areas or include Impacted Areas.

Five Rock Island census tracts include a percentage of overcrowded units that exceeds the City's overall rate for overcrowded units (1.1%). The percentage of overcrowded units in these census tracts ranges from 1.8% to 4.8%. These census tracts are CT 235, CT 236, CT 237, CT 245 and CT 247. Except for CT 242, all of these census tracts are Impacted Areas or include Impacted Areas.

Rock Island's Impacted Areas contain 44% of the city's housing units, including 45% of the city's units that lack complete plumbing, 58% of the city's overcrowded units and 57% of the city's housing built before 1950.

Generally speaking, the Impacted Areas of the three cities have the oldest housing stock. Older housing units are more likely to need rehabilitation, and Impacted Areas should therefore continue to be targeted for housing rehabilitation programs.

Another ramification of older housing stock is the likelihood of the presence of lead-based paint in dwelling units. According to the Center for Disease Control, lead is the number one environmental health hazard to American children. Young children become lead-poisoned when they put paint chips or exterior soil in their mouths. Lead poisoning causes IQ reductions, reading and learning disabilities, decreased attention span, hyperactivity and aggressive behavior.

Lead-based paint was banned from use in residential units in 1978. All homes built before then may contain lead-based paint. As noted above, more than one-third of the housing units in the three cities were built before 1950. Most of the Impacted Areas have a percentage of pre-1950 units that is higher (in some cases more than double) the city average for such units. Many of the pre-1950 units that may contain lead-based paint are rental units, and rental units are more likely to be occupied by members of the protected classes.

Due to the high percentage of pre-1950 units throughout the state, the Iowa Department of Public Health has designated the entire State of Iowa as being at high-risk for lead-based paint hazards with regard to young children. The Illinois Department of Public Health has identified Rock Island County as a "high risk" area for the prevention of childhood lead poisoning, and the cities of Moline and Rock Island have been designated as high-risk zip codes within the county. These high-risk designations underscore the severity of the lead-based paint hazards present in the housing stock of the three cities.

All three cities have active lead-based paint hazard reduction programs. In Davenport, more than 500 homes have received lead-based paint testing and applicable lead-based paint hazard reduction. Davenport has just received a $2.5 million HUD grant to address lead remediation in over 200 additional properties. Through a joint grant from the Illinois' Healthy Homes Program, Moline and Rock Island are making homes lead safe in their cities. Using Healthy Homes Program funds and other funding, Moline has remediated lead-based paint in 84 housing units, and Rock Island has reduced lead hazards in an average of 13-14 units per year with its grant funds.

All three cities recognize the need for additional lead-based paint remediation in their cities and are actively seeking additional funding to continue to address this urgent need to protect the lives of city children.

iv. Protected Class Status and Home Ownership

The value of home ownership lies in the accumulation of wealth as the owner's share of equity increases with the property's value. Paying a monthly mortgage instead of rent is an investment in an asset that is likely to appreciate. According to one study, "a family that puts 5 percent down to buy a house will earn a 100 percent return on the investment every time the house appreciates 5 percent."[1]

Historically, minorities tend to have lower home ownership rates than Whites. In Davenport, Moline and Rock Island, Whites have the highest home ownership rates and Blacks have the lowest home ownership rates. However, the rates of minority homeownership varied significantly among the three cities. For example, minorities were most likely to be homeowners in Rock Island, where nearly half of all Black households were homeowners, than elsewhere. Furthermore, 56.8% of all Hispanic households and 61.4% of all Asian households were homeowners.

Figure 2-35
Homeownership by Race and Ethnicity, 2010

	White		Black		Asian		Hispanic	
	#	%	#	%	#	%	#	%
Davenport	23,757	68.2%	1,378	32.9%	341	57.1%	868	50.5%
Moline	11,705	73.1%	193	30.4%	166	44.5%	1,199	61.3%
Rock Island	9,088	74.6%	1,290	46.0%	35	61.4%	421	56.8%

Source: U.S. Census Bureau, Census 2006-2010 (B25003A, B25003B, B25003D, B25003I)

Minority households in Davenport, Moline and Rock Island were less likely to be homeowners.

However, minority households in Rock Island were more likely to be homeowners than elsewhere.

[1] Kathleen C. Engel and Patricia A. McCoy, "From Credit Denial to Predatory Lending: The Challenge of Sustaining Minority Homeownership," in Segregation: The Rising Costs for America, edited by James H. Carr and Nandinee K. Kutty (New York: Routledge 2008) p. 82.

v. The Tendency of the Protected Classes to Live in Larger Households

Larger families may be at risk for housing discrimination on the basis of race and the presence of children (familial status). A larger household, whether or not children are present, can raise fair housing concerns. If there are policies or programs that restrict the number of persons that can live together in a single housing unit, and members of the protected classes need more bedrooms to accommodate their larger household, there is a fair housing concern because the restriction on the size of the unit will have a negative impact on members of the protected classes.

In Davenport, Moline and Rock Island, minorities were much more likely than Whites to live in families with three or more persons. The minorities with the highest rates of larger family households varied by city. In Davenport, Asians had the highest rate (78.8%). In Moline and Rock Island, Some Other Race Alone had the highest rates, 82.2% and 81.9%, respectively. All other minority groups in the three cities were also more likely to have larger families than Whites, as shown in Figure 2-36.

Figure 2-36
Families with Three or More Persons, 2010

Race	Percent of Families with 3 or more persons		
	Davenport	Rock Island	Moline
White	52.8%	48.3%	50.1%
Black	69.5%	64.0%	69.4%
Asian	78.8%	74.6%	70.6%
Some Other Race Alone	77.3%	81.9%	82.2%
Two or More Races	74.3%	73.4%	77.8%
Hispanic	75.2%	76.9%	78.6%

Source: U.S. Census Bureau, Census 2010 (SF1, P28A, P28B, P28D, P28F, P28G, P28H)

In Davenport, Moline and Rock Island, minorities were much more likely than Whites to live in larger households.

To adequately house larger families, a sufficient supply of larger dwelling units consisting of three or more bedrooms is necessary. In Davenport in 2010, rental units with three or more bedrooms comprised 8.4% of the city's total housing units. The corresponding figures for Moline and Rock Island were 6.2% and 7.0%, respectively. By comparison, owner units with three or more bedrooms composed 44.6% of Davenport's total housing units, 48.3% of Moline's total housing units, and 44.0% of Rock Island's total housing units. Figures 2-37, 2-38 and 2-39 contain additional data on housing units by number of bedrooms for each of the three cities.

Figure 2-37
Davenport Housing Units by Number of Bedrooms, 2010

Size of Housing Units	Number of Renter Units	Percent of Total Housing Units	Number of Owner Units	Percent of Total Housing Units
0-1 bedroom	4,867	16.9%	565	1.4%
2 bedrooms	6,394	15.7%	6,524	16.0%
3 or more bedrooms	**3,446**	**8.4%**	**19,032**	**46.6%**
Total	14,707	**36.0%**	26,121	**64.0%**

Source: U.S. Census Bureau, ACS Census 2006-2010 (B25042)

Figure 2-38
Moline Housing Units by Number of Bedrooms, 2010

Size of Housing Units	Number of Renter Units	Percent of Total Housing Units	Number of Owner Units	Percent of Total Housing Units
0-1 bedroom	1,860	10.2%	325	1.8%
2 bedrooms	2,452	13.4%	3,661	20.1%
3 or more bedrooms	**1,123**	**6.2%**	**8,817**	**48.3%**
Total	5,435	**29.8%**	12,803	**70.2%**

Source: U.S. Census Bureau, ACS Census 2006-2010 (B25042)

Figure 2-39
Rock Island Housing Units by Number of Bedrooms, 2010

Size of Housing Units	Number of Renter Units	Percent of Total Housing Units	Number of Owner Units	Percent of Total Housing Units
0-1 bedroom	2,072	13.3%	294	1.9%
2 bedrooms	1,672	10.8%	3,564	22.9%
3 or more bedrooms	**1,081**	**7.0%**	**6,853**	**44.0%**
Total	4,825	**31.1%**	10,711	**68.9%**

Source: U.S. Census Bureau, ACS Census 2006-2010 (B25042)

There is a relative shortage of larger rental units in Davenport, Moline and Rock Island.

Rental units with three or more bedrooms accounted for 6% to 9% of the total housing units in the three cities. By comparison, owner units with three or more bedrooms accounted for 44% to 48% of their total housing units. An inadequate inventory of larger units can lead to overcrowding and substandard living conditions for large families.

vi. Protected Classes in Public Housing and Section 8 Housing

One consequence of the scarcity of affordable housing for members of the protected classes is their reliance on assisted housing to meet their housing needs. The relative presence of members of the protected classes as current and prospective public housing and Section 8 tenants is evidence of this situation.

In 2010, 11% of Davenport's population was Black. In February 2012, Blacks represented 84% of the Davenport Housing Commission's (DHC) public housing tenants and 61% of its Section 8 tenants. Also in February 2012, Blacks comprised 53% of DHC's public housing waiting list and 55% of its Section 8 waiting list. Blacks are thus very much overrepresented in Davenport's public housing and Section 8 housing.

By contrast, although 7% of Davenport's population in 2010 was Hispanic, in February 2012, none of its public housing tenants was Hispanic. (Information on Hispanic Section 8 tenants was not available.) Also, Hispanics comprised 5% of DHC's public housing waiting list and 4% of its Section 8 waiting list. This underrepresentation of Hispanics in Davenport's public housing and Section 8 housing supports anecdotal information provided by stakeholders interviewed during the AI process. These interviewees stated that Hispanics want to live in houses, not apartments.

Another protected class overrepresented in DHC's public housing and Section 8 housing is families with children. Families with children compose 47% of Davenport's total family households, but they are 90% of DHC's current public housing tenants and 64% of its Section 8 tenants. Families with children represent 99% of DHC's public housing waiting list and 65% of its Section 8 waiting list.

Census data indicates that, in 2010, 11% of Davenport's population that was age 5 or older had at least one disability. In February 2012, 8% of DHC's public housing tenants were families with disabilities, as was 23% of its Section 8 tenants. At the same time, 8% of DHC's public housing waiting list was families with disabilities, as was 24% of its Section 8 waiting list. Thus families with disabilities were slightly underrepresented as DHC current or prospective public housing tenants, but were overrepresented as current or prospective Section 8 tenants.

Figure 2-40
Protected Classes in Public Housing and Section 8 Housing in Davenport, February 2012

Protected Class	% of City Population	% of Public Housing Tenants	% of Section 8 Tenants	% of Public Housing Waiting List	% of Section 8 Waiting List
Blacks	11	84	61	53	55
Hispanics	7	0	NA	5	4
Families with children	47*	90	64	99	65
Families with disabilities	11**	8	23	8	24

Sources: Davenport Housing Commission

U.S. Census Bureau 2008-2010 American Community Survey

**Percentage of Total Family Households*

***Percentage of Population Age 5 and older that has at least one disability*

In Moline in 2010, 5% of the city's population was Black. In February 2012, Blacks comprised 51% of the Moline Housing Authority's (MHA) public housing waiting list and 66% of its Section 8 waiting list. Blacks comprised 42% of MHA's current public housing households and 44% of its current Section 8 voucher holders. As in Davenport, Blacks

were thus overrepresented among Moline's current and prospective public housing and Section 8 tenants.

Moline's 2010 population was 16% Hispanic. In February 2012, just 5% of its public housing tenants and 3% of its public housing and Section 8 waiting lists were Hispanic, making Hispanics very much underrepresented among MHA's current and prospective public housing residents and prospective Section 8 tenants.

Families with children represent 42% of Moline's total family households, and they are 30% of the MHA's public housing waiting list, i.e., somewhat underrepresented. No other information is available about families with children as MHA current or future public housing and Section 8 tenants.

Census data indicates that, in 2010, 11% of Moline's population that was age 5 and older had at least one disability. In February 2012, 9% of MHA's public housing waiting list was families with disabilities – a slight underrepresentation. No other information is available about families with disabilities as current or prospective MHA public housing and Section 8 tenants.

Figure 2-41
Protected Classes in Public Housing and Section 8 Housing in Moline, February 2012

Protected Class	% of City Population	% of Public Housing Tenants	% of Section 8 Tenants	% of Public Housing Waiting List	% of Section 8 Waiting List
Blacks	5	42	44	51	66
Hispanics	16	NA	NA	3	3
Families with Children	42*	23	NA	30	NA
Families with Disabilities	11**	30	4	9	NA

Sources: Moline Housing Authority

U.S. Census Bureau 2008-2010 American Community Survey

**Percentage of Total Family Households*

***Percentage of Population Age 5 and older that has at least one disability*

In 2010, 18% of Rock Island's population was Black. In February 2012, Blacks comprised 51% of the Rock Island Housing Authority (RIHA) public housing tenants and 59% of its Section 8 tenants. Also in February 2012, Blacks comprised 54% of RIHA's public housing waiting list and 73% of its Section 8 waiting list. Blacks are very much overrepresented in Rock Island's public housing and Section 8 housing.

Although 9% of Rock Island's population in 2010 was Hispanic, in February 2012, just 4% of its public housing tenants were Hispanic, as were 8% of its Section 8 tenants. Also, Hispanics represented 5% of RIHA's public housing waiting list and 3% of its Section 8 waiting list. Therefore, in Rock Island, Hispanics were underrepresented among RIHA's current public housing tenants and among both current and prospective Section 8 tenants. However, they were proportionately represented as current Section 8 tenants.

In terms of families with children, 46% of Rock Island's total family households in 2010 were families with children. At the same time, 27% of RIHA's public housing tenants and 62% of its Section 8 tenants were families with children, making this protected class underrepresented in public housing and overrepresented in Section 8 housing. Families

with children were overrepresented as both prospective public housing tenants and future Section 8 tenants.

In 2010, 13% of Rock Island's population that was age 5 or older had at least one disability. In February 2012, 34% of RIHA's public housing tenants and 24% of its Section 8 tenants were families with disabilities – overrepresentations on both counts. By contrast, just 6% of both its public housing waiting list and its Section 8 waiting list were families with disabilities – a significant underrepresentation.

Figure 2-42
Protected Classes in Public Housing and Section 8 Housing in Rock Island, February 2012

Protected Class	% of City Population	% of Public Housing Tenants	% of Section 8 Tenants	% of Public Housing Waiting List	% of Section 8 Waiting List
Blacks	18	51	59	54	73
Hispanics	9	4	8	5	3
Families with children	46*	27*	62*	61	67
Families with disabilities	13**	34**	24*	6	6

Sources: Rock Island Housing Authority

U.S. Census Bureau 2008-2010 American Community Survey

**Percentage of Total Family Households*

***Percentage of Population Age 5 and older that has at least one disability*

With the exception of Hispanics, Blacks, families with children and families with disabilities are usually overrepresented in public housing and Section 8 housing.

Assisted housing is often the housing of last resort of Black families, families with children and families with disabilities.

vii. Cost of Housing

Increasing housing costs are not a direct form of housing discrimination. However, a lack of affordable housing does constrain housing choice. Residents may be limited to a smaller selection of neighborhoods or communities because of a lack of affordable housing in those areas.

Between 1990 and 2010, real (i.e., inflation-adjusted) household income decreased 8.3% in Davenport, but increased 12.2% in Moline and 38.8% in Rock Island. During the same period, real median housing values increased 35.6% in Davenport, 20.7% in Moline and 34.6% in Rock Island. This data suggests that, between 1990 and 2010, the for-sale housing market in Davenport and Moline became relatively less affordable (particularly in Davenport), while it became slightly more affordable in Rock Island.

During that same period, real median gross rent increased just 1.9% in Davenport, 3.6% in Moline, and 4.0% in Rock Island. As with the for-sale housing market, the rental housing market in Davenport became relatively less affordable, but the rental housing markets in both Moline and Rock Island became more affordable, significantly so in Rock Island.

As noted above, increased housing costs reduce the amount of affordable housing available for consideration by the protected classes, many of whom have low incomes. (Also, see Section iv. A. Rental Housing below.)

Figure 2-43
Trends in Median Housing Value, Rent and Income in Davenport, 1990-2010

	1990	2000	2010	Change 1990-2010
Median Housing Value				
Actual Dollars	$48,600	$80,200	$115,900	138.5%
2010 Dollars	$85,464	$104,971	$115,900	35.6%
Median Gross Rent				
Actual Dollars	$351	$482	$629	79.2%
2010 Dollars	$617	$631	$629	1.9%
Median Household Income				
Actual Dollars	$26,218	$47,248	$42,261	61.2%
2010 Dollars	$46,105	$61,841	$42,261	-8.3%

Sources: U.S. Census Bureau, 1990 Census (STF3-H061A, H043A, P080A), Census 2000 (SF3-DP-3, DP-4), 2006-2010 American Community Survey (B25077, B25064, B19013); Calculations by Mullin & Lonergan Associates, Inc.

Figure 2-44
Trends in Median Housing Value, Rent and Income in Moline, 1990-2010

	1990	2000	2010	Change 1990-2010
Median Housing Value				
Actual Dollars	$52,096	$80,500	$110,600	112.3%
2010 Dollars	$91,612	$105,363	$110,600	20.7%
Median Gross Rent				
Actual Dollars	$350	$474	$637	82.0%
2010 Dollars	$615	$620	$637	3.6%
Median Household Income				
Actual Dollars	$24,978	$39,363	$49,290	97.3%
2010 Dollars	$43,924	$51,521	$49,290	12.2%

Sources: U.S. Census Bureau, 1990 Census (STF3-H061A, H043A, P080A), Census 2000 (SF3-DP-3, DP-4), 2006-2010 American Community Survey (B25077, B25064, B19013); Calculations by Mullin & Lonergan Associates, Inc.

Figure 2-45
Trends in Median Housing Value, Rent and Income in Rock Island, 1990-2010

	1990	2000	2010	Change 1990-2010
Median Housing Value				
Actual Dollars	$41,483	$70,600	$98,200	136.7%
2010 Dollars	$72,949	$92,405	$98,200	34.6%
Median Gross Rent				
Actual Dollars	$314	$437	$574	82.8%
2010 Dollars	$552	$572	$574	4.0%
Median Household Income				
Actual Dollars	$16,996	$34,729	$41,475	144.0%
2010 Dollars	$29,888	$45,455	$41,475	38.8%

Sources: U.S. Census Bureau, 1990 Census (STF3-H061A, H043A, P080A), Census 2000 (SF3-DP-3, DP-4), 2006-2010 American Community Survey (B25077, B25064, B19013); Calculations by Mullin & Lonergan Associates, Inc.

Between 1990 and 2010, for-sale housing became less affordable in Davenport and Moline, and slightly more affordable in Rock Island. During that same period, rental housing became less affordable in Davenport, but more affordable in Moline and Rock Island.

a. Rental Housing

In addition to the growth in median housing costs outpacing growth in median household income, Davenport, Moline and Rock Island have experienced significant losses of affordable rental units over the past decade. Between 2000 and 2010, the number of units renting for less than $500 a month in the area decreased by more than half, from 13,950 to 6,483. By comparison, the number of units renting for $1,000 and up more than tripled, from 463 to 2,083.

Each of the three cities underwent substantial changes in the number of affordable rental units they offer. Davenport saw a 54% drop in units renting for less than $500 per month, while Moline experienced a 59% decrease in the number of such units. Rock Island had a 47% drop in units renting for less than $500. Figures 2-46, 2-47, 2-48 and 2-49 contain more detailed information concerning the area's loss of affordable rental units between 2000 and 2010. Figure 2-50 illustrates this data.

The loss of affordable rental housing units usually has a significant impact on the protected classes due to their often limited incomes. Most of the stakeholders interviewed during the preparation of this AI cited the need for affordable housing as a top priority for their protected-class clients.

As noted in the above section on changes in the cost of housing between 1990 and 2010, the cost of rental housing became less affordable in Davenport and more affordable in Moline and Rock Island. The reduction in both the affordability and supply of rental units

in Davenport would therefore seem to pose particular problems for members of the protected classes who seek affordable housing in that city.

Figure 2-46
Loss of Affordable Rental Housing Units in Davenport, 2000-2010

Units Renting for:	2000	2010	Change 2000-2010	
			#	%
Less than $500	7,180	3,293	-3,887	-54.1%
$500 to $999	5,830	9,672	3,842	65.9%
$1,000 or more	224	1,111	887	396.0%

Sources: U.S. Census Bureau, Census 2000 (SF3, DP-4), 2006-2010 American Community Survey (B25063)

Figure 2-47
Loss of Affordable Rental Housing Units in Moline, 2000-2010

Units Renting for:	2000	2010	Change 2000-2010	
			#	%
Less than $500	3,305	1,346	-1,959	-59.3%
$500 to $999	2,522	3,443	921	36.5%
$1,000 or more	44	481	437	993.2%

Sources: U.S. Census Bureau, Census 2000 (SF3, DP-4), 2006-2010 American Community Survey (B25063)

Figure 2-48
Loss of Affordable Rental Housing Units in Rock Island, 2000-2010

Units Renting for:	2000	2010	Change 2000-2010	
			#	%
Less than $500	3,465	1,844	-1,621	-46.8%
$500 to $999	1,734	2,346	612	35.3%
$1,000 or more	195	491	296	151.8%

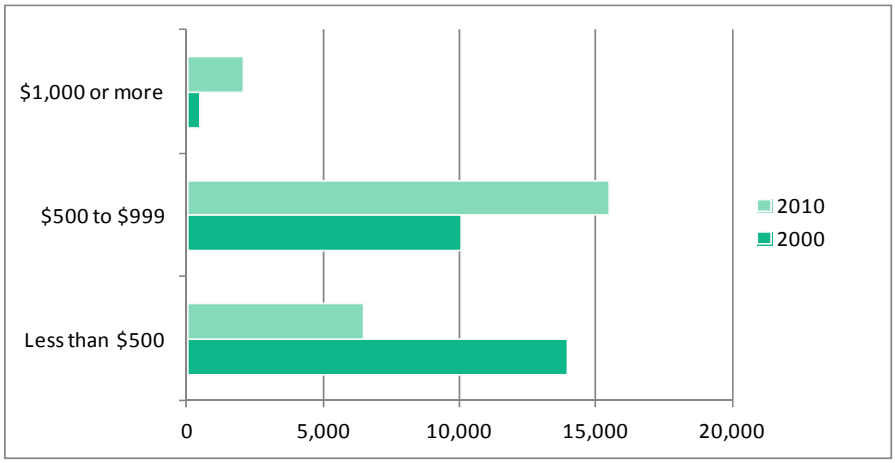
Sources: U.S. Census Bureau, Census 2000 (SF3, DP-4), 2006-2010 American Community Survey (B25063)

Figure 2-49
Loss of Affordable Rental Housing Units in Davenport, Moline and Rock Island, 2000-2010

Units Renting for:	2000	2010	Change 2000-2010	
			#	%
Less than $500	13,950	6,483	-7,467	-53.5%
$500 to $999	10,086	15,461	5,375	53.3%
$1,000 or more	463	2,083	1,620	349.9%

Sources: U.S. Census Bureau, Census 2000 (SF3, DP-4), 2006-2010 American Community Survey (B25063)

Figure 2-50
Loss of Affordable Rental Housing Units in Davenport, Moline and Rock Island, 2000-2010



There was a significant loss of affordable rental units in Davenport, Moline and Rock Island over the past decade.

In the three cities, almost 7,500 units renting for less than $500 a month (54%) were lost between 2000 and 2010. During the same period, the number of units renting for more than $1,000 increased by over 1,620 units, or 350%.

The National Low Income Housing Coalition provides annual information on the Fair Market Rent (FMR) and affordability of rental housing in each metropolitan statistical area (MSA) in the U.S. The three entitlement communities form the Davenport-Moline-Rock Island MSA. In 2011, the HUD Fair Market Rent (FMR) in the Davenport-Moline-Rock Island MSA for a two-bedroom apartment was $669. In order to afford this level of rent and utilities, without paying more than 30% of income on housing, a household must earn $2,230 monthly or $26,760 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into a Housing Wage of $12.87 per hour.

In the Davenport-Moline-Rock Island MSA, a minimum wage worker earns an hourly wage of $8.25. In order to afford the FMR for a two-bedroom apartment, a minimum wage earner must work 62 hours per week, 52 weeks per year. Or, a household must include 1.6 minimum wage earners working 40 hours per week year-round in order to make the two-bedroom FMR affordable.

In the Davenport-Moline-Rock Island MSA, the estimated average wage for a renter is $11.41 an hour. In order to afford the FMR for a two-bedroom apartment at this wage, a renter must work 45 hours per week, 52 weeks per year. Or, working 40 hours per week year-round, a household must include 1.1 workers earning the average renter wage in order to make the two-bedroom FMR affordable.

Minimum wage earners and single-wage earning households cannot afford a housing unit renting for the HUD fair market rent in the Davenport-Moline-Rock Island Metropolitan Statistical Area.

This situation forces these individuals and households to double-up with others, or lease inexpensive, substandard units. Minorities and female-headed households may be disproportionately impacted because of their lower incomes.

Monthly Supplemental Security Income (SSI) payments for an individual are $674 in the Davenport-Moline-Rock Island Metropolitan Statistical Area. If SSI represents an individual's sole source of income, $202 in monthly rent is affordable, while the 2012 HUD FMR for an efficiency unit is $467.

Individuals whose sole source of income is a $674 monthly SSI check cannot afford to rent an efficiency unit in the three cities at the 2011 HUD fair market rent of $467.

This situation disproportionately impacts persons with disabilities whose only source of income may be their SSI checks.

One measure of the maximum affordable rents for racial and ethnic groups in Davenport, Moline and Rock Island is the extent to which households of these groups with median household income can afford the median gross rents in their cities.

In 2010, in Davenport, White households with a median household income of $45,704 could afford a maximum rent of $1,143. Hispanics with a median household income of $34,505 had a maximum affordable rent of $863, and Black households could afford a maximum rent of $608 based on a median household income of $24,309. The median gross rent in Davenport in 2010 was $629, well below the maximum affordability levels of Whites and Hispanics, but slightly above the maximum affordability level of Black households.

Black renter households fared better in Moline. In 2010, White households in Moline had a median household income of $50,816 and a maximum affordable rent of $1,270. Moline Hispanic households with a median household income of $37,603 had a maximum affordable rent of $940, and Blacks could afford a maximum rent of $734 based on a median household income of $29,348. The median gross rent in Moline in 2010 was $637 and thus was affordable to White, Hispanic, and Black households that had incomes at or above the median household income levels for their racial or ethnic group.

In Rock Island in 2010, Black households at or above median household income levels could afford rental units with monthly rents at or somewhat above the city's median gross rent of $574. Black households could afford a maximum rent of $663 based on median house hold income of $26,535. Whites with a median household income of $46,589 could afford a maximum rent of $1,146, and Hispanics with a median household income of $33,000 had a maximum affordable rent of $825.

Figure 2-51
Maximum Affordable Rent by Race/Ethnicity, 2010

	Median Household Income	Maximum Affordable Monthly Rent*	Median Gross Rent
City of Davenport	**$42,261**	**$1,057**	**$629**
Whites	$45,704	$1,143	
Blacks	$24,309	$608	
Hispanics	$34,505	$863	
City of Moline	**$49,290**	**$1,232**	**$637**
Whites	$50,816	$1,270	
Blacks	$29,348	$734	
Hispanics	$37,603	$940	
City of Rock Island	**$41,475**	**$1,037**	**$574**
Whites	$45,859	$1,146	
Blacks	$26,535	$663	
Hispanics	$33,000	$825	

Source: U.S. Census Bureau, 2006-2010 American Community Survey (B19013, B19013A, B19013B, B19013D, B19013I, B25077, B25064)
*30% of Gross Monthly Income

With the exception of Black households in Davenport, in 2010, White, Black and Hispanic households with incomes at or above their cities' median household income levels for their respective racial or ethnic group could afford the median gross rents in their cities.

b. For-Sale Housing

The housing sales market in Davenport, Moline and Rock Island has generally followed recent national trends, with growth in the number of sales between 2002 and 2005 and a steep decline since then. At the peak of the market in 2005, a total of 2,530 single family units and condos were sold. By 2011, the number of units sold fell 33.5% to 1,682.

Median sales prices in the area remained strong even after the number of units sold began to fall. The median sales price peaked at $112,446 in 2007. By 2011, the median sales price had dropped just 2.8% to $109,299.

One measure of the strength of the housing market is the number of days that units remain on the market before selling. As would be expected, during the sales housing boom years leading up to 2005, the average number of days that houses were on the market was about 55. However, the slow sales housing market of 2011 resulted in this number growing to almost 70 days.

Another indication of the strength of the housing market is the ratio of the sales price to the list price. In a strong seller's market, this ratio tends to be higher, as sellers can "get what the market will bear" and not have to accept much less than the list price in order to sell their homes. The reverse is true for a buyer's market. During the boom sales housing market years in the three-city area (i.e., the seller's market), the sales price as a

percentage of the list price ranged from 96% to 98%. Since then, this ratio has dropped to about 94%.

There were some notable differences in the housing sales market among the three cities. Between their peak years and 2011, the three cities experienced the following changes:

Davenport:

- Change in the number of units sold: -32.4%
- Change in number of days on market: +6, the smallest increase among the cities
- Drop in selling price: 7.1%
- Change in the ratio of selling price to asking price: -2.1%, the smallest change among the cities

Moline:

- Drop in the number of units sold: 32.6%
- Change in the number of days on the market: +16
- Drop in selling price: 7.1%
- Change in the ratio of selling price to asking price: -3.2%

Rock Island:

- Drop in the number of units sold: 40.1%, the largest decrease among the cities
- Change in the number of days on market: +23, the largest increase among the cities
- Drop in selling price: 5.3%, the smallest loss among the cities
- Change in the ratio of selling price to asking price: -3.3%, the largest decrease among the cities

In addition, Moline was the only city whose peak year for units sold (2002) preceded the national and local peak years of 2004 and 2005. In 2002, there were 558 units sold in Moline. By 2006, this number dropped to 530 and then sharply and steadily declined to 376 in 2011.

Conversely, Moline's peak year for average selling price was 2007---several years after the national peak years of 2004 and 2005. Rock Island's peak year for average selling price (2009) was even further beyond the national peak years.

Figure 2-52
Davenport Housing Market Trends, 2002-2011

Year	Single-Family & Condo Units		
	Number of Sales	Average Sales Price	Average Days on Market
2002	1,356	$112,668	62
2003	1,471	$115,636	60
2004	1,518	$119,022	55
2005	1,516	$133,624	54
2006	1,428	$127,890	54
2007	1,315	$129,996	54
2008	1,231	$127,382	63
2009	1,192	$123,892	60
2010	1,122	$129,396	60
2011	1,025	$124,746	60

Source: MLS

Figure 2-53
Davenport Housing Market Trends, 2002-2011

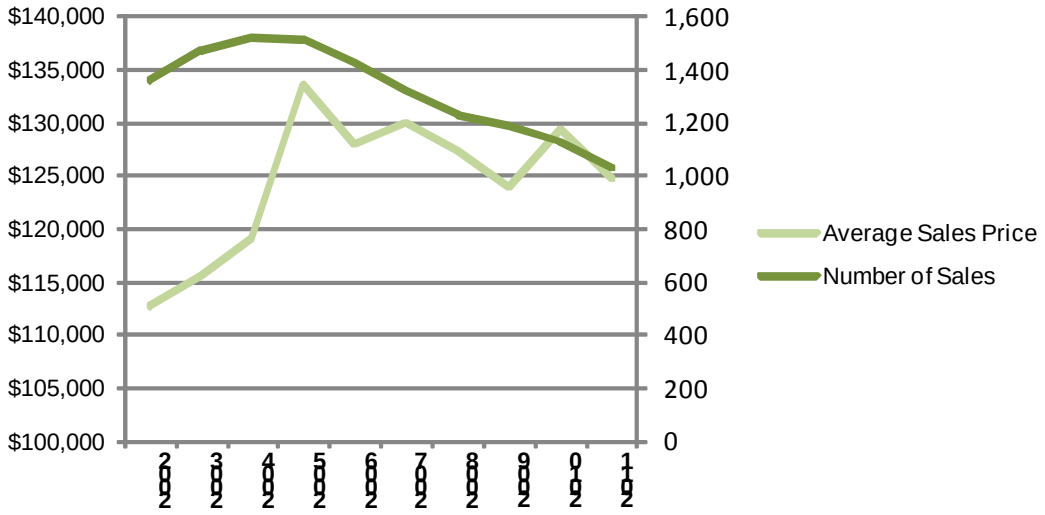


Figure 2-54
Moline Housing Market Trends, 2002-2011

Year	Single-Family & Condo Units		
	Number of Sales	Average Sales Price	Average Days on Market
2002	558	$99,591	57
2003	543	$98,309	57
2004	540	$100,501	55
2005	541	$110,689	57
2006	530	$107,866	64
2007	467	$114,246	58
2008	475	$111,592	63
2009	457	$107,903	57
2010	424	$113,315	64
2011	376	$106,158	71

Source: MLS

Figure 2-55
Moline Housing Market Trends, 2002-2011

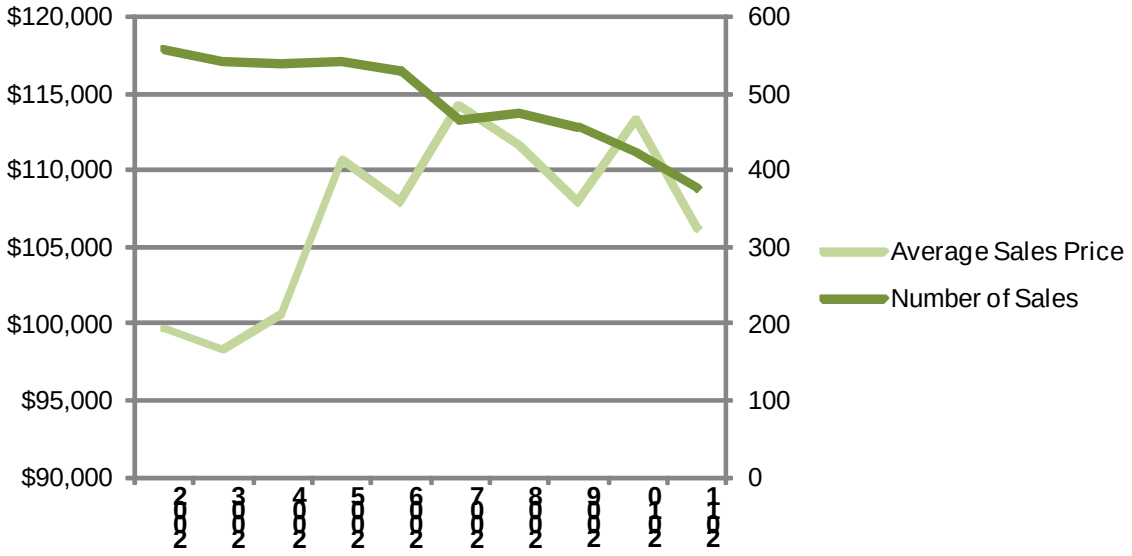
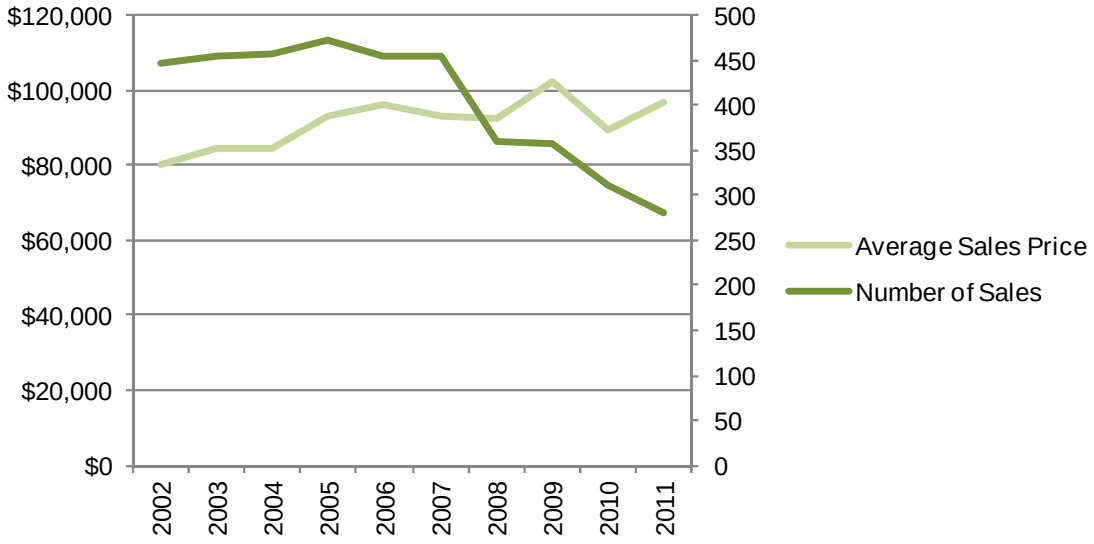


Figure 2-56
Rock Island Housing Market Trends, 2002-2011

Year	Single-Family & Condo Units		
	Number of Sales	Average Sales Price	Average Days on Market
2002	447	$80,203	57
2003	454	$84,196	54
2004	456	$84,621	56
2005	473	$92,875	55
2006	454	$96,382	57
2007	455	$93,096	61
2008	359	$92,307	63
2009	358	$102,383	65
2010	312	$89,718	68
2011	281	$96,993	77

Source: MLS

Figure 2-57
Rock Island Housing Market Trends, 2002-2011



One method used to determine the inherent affordability of a housing market is to calculate the percentage of homes that could be purchased by households at the median income level.[1] A relatively affordable housing market is one in which at least 40% of the homes could be purchased by households at the median household income.

[1] Joe Light, "Last of the Red-Hot Markets," Money Magazine December 2007: 53-56.

In 2000, the maximum affordable sales price for a Davenport household earning the median household income of $47,248 was $96,650. During that year, an estimated 730 units were sold for less than $95,000, equivalent to 60% of all units sold. In 2010, the maximum affordable sales price for a Davenport household earning the median household income of $42,261 was $110,100. During that year, approximately 534 units were sold for less than $110,000, representing 48% of all units sold. Therefore, from 2000 to 2010, the number of units sold within the affordability range of Davenport households earning the median income decreased 12%. Still, the housing stock in Davenport continues to be inherently affordable.

The affordability issue is different in Moline. In 2000, the maximum affordable sales housing price for a Moline household earning the median household income of $39,363 was $63,100. During that year, about 250 units were sold for less than $70,000 equivalent to 44% of all units sold. In 2010, the maximum affordable sales price for a Moline household earning the median household income of $49,290 was $127,000. During that year, a total of 295 units were sold for less than $120,000, representing 70% of all units sold. Therefore, from 2000 to 2010, the number of units sold within the affordability range of Moline households earning the median income increased 26%. As a result, Moline's housing market is an increasingly affordable market.

In Rock Island, the affordability issue is similar to Moline. In 2000, the maximum affordable sales housing price for a Rock Island household earning the median household income of $34,729 was $47,250. During that year, about 190 units were sold for less than $50,000 equivalent to 40% of all units sold. In 2010, the maximum affordable sales price for a Rock Island household earning the median household income of $41,475 was $90,500. During that year, a total of 177 units were sold for less than $90,000, representing 57% of all units sold. Therefore, from 2000 to 2010, the number of units sold within the affordability range of Rock Island households earning the median income increased 17%. Rock Island also has an increasingly affordable housing market.

The sales housing market in Davenport, Moline and Rock Island is an affordable one for households earning the median household income, but it is becoming less so in Davenport.

Between 2000 and 2010, the housing markets in Moline and Rock Island increased in their degree of affordability compared to Davenport, where fewer units were affordable to median income households.

Figure 2-58
Units Sold by Price in Davenport, 2002 and 2010

Price Range	2002			2010		
	Single-Family	Condo	Total	Single-Family	Condo	Total
$69,999 and under	357	13	370	242	2	244
$70,000-$89,999	304	7	311	136	13	149
$90,000-$99,000	73	2	75	61	5	66
$100,000-$119,000	93	9	102	137	13	150
$120,000-$159,000	165	10	175	186	23	209
$160,000-$199,000	89	16	105	98	19	117
$200,000-$249,000	32	2	34	72	12	84
$250,000-$299,000	27	0	27	46	9	55
$300,000-$399,000	12	0	12	42	1	43
$400,000-$499,000	2	0	2	4	0	4
$500,000 and over	3	0	3	1	0	1
TOTAL	1,157	59	1,216	1,025	97	1,122

Sources: 2006-2010 American Community Survey (B119013, B19013A, B19013B, B19013I); Quad Cities Realtor Association Data

Calculations by Mullin & Lonergan Associates, Inc.

Figure 2-59
Units Sold by Price in Moline, 2002 and 2010

Price Range	2002			2010		
	Single-Family	Condo	Total	Single-Family	Condo	Total
$69,999 and under	235	17	252	105	5	110
$70,000-$89,999	119	2	121	75	5	80
$90,000-$99,000	30	4	34	37	2	39
$100,000-$119,000	37	3	40	61	5	66
$120,000-$159,000	47	7	54	54	10	64
$160,000-$199,000	15	5	20	19	14	33
$200,000-$249,000	11	5	16	12	3	15
$250,000-$299,000	9	9	18	4	1	5
$300,000-$399,000	3	7	10	4	1	5
$400,000-$499,000	2	0	2	4	0	4
$500,000 and over	0	0	0	3	0	3
TOTAL	508	59	567	378	46	424

Sources: 2006-2010 American Community Survey (B119013, B19013A, B19013B, B19013I); Quad Cities Realtor Association Data

Calculations by Mullin & Lonergan Associates, Inc.

Figure 2-60
Units Sold by Price in Rock Island, 2002 and 2010

Price Range	2002			2010		
	Single-Family	Condo	Total	Single-Family	Condo	Total
$69,999 and under	266	4	270	113	4	117
$70,000-$89,999	96	3	99	54	6	60
$90,000-$99,000	14	3	14	22	4	26
$100,000-$119,000	27	1	28	37	2	39
$120,000-$159,000	31	3	34	34	5	39
$160,000-$199,000	14	1	15	15	3	18
$200,000-$249,000	2	0	2	7	2	9
$250,000-$299,000	2	0	2	2	0	2
$300,000-$399,000	2	0	2	2	0	2
$400,000-$499,000	0	0	0	0	0	0
$500,000 and over	0	0	0	0	0	0
TOTAL	454	15	466	286	26	312

Sources: 2006-2010 American Community Survey (B119013, B19013A, B19013B, B19013I); Quad Cities Realtor Association Data

Calculations by Mullin & Lonergan Associates, Inc.

It is also possible to determine the affordability of the housing market for racial or ethnic groups in Davenport, Moline and Rock Island. To determine affordability (i.e., how much mortgage a household could afford), the following assumptions were made:

- The mortgage was a 30-year fixed rate loan at a 4.0% interest rate;
- The buyer made a 10% down payment on the sales price;
- Property taxes were based on the total applicable tax rates for each city;
- Additional consumer debt (credit cards, car loans, etc.) payments totaling $500 per month; and
- The buyer's total debt payments (including principal, interest, taxes and insurance [PITI] and other consumer debt) equaled no more than 35% of gross monthly income.

Figures 2-61, 2-62 and 2-63 detail the estimated maximum affordable sales prices and monthly PITI payments for Whites, Blacks, and Hispanics in Davenport, Moline, and Rock Island in 2010. In all three cities, Whites had substantially higher median household incomes than Blacks and Hispanics. Consequently, Whites had substantially higher maximum affordable housing purchase prices than Blacks and Hispanics.

In Davenport in 2010, Whites with a median household income of $45,704 had a maximum affordable housing purchase price of $127,000, compared to $72,000 for Hispanics with a median household income of $34,505. Blacks could afford a maximum affordable housing purchase price of just $21,750, based on median household income of $24,309. In Davenport, only Whites earning the median household income could afford the median sales priced home in 2010.

Based on the data provided in Figure 2-58, Black and Hispanic households would have been able to afford only a fraction of the 244 units that sold for less than $70,000 in 2010, By comparison, Whites earning the median income would have found a total of 609 units selling for $119,000 or less affordable to them.

Figure 2-61
Maximum Affordable Purchase Price by Race/Ethnicity in Davenport, 2010

	Median Household Income	Monthly Mortgage Payment				
		Mortgage Principal & Interest	Real Estate Taxes	Homeowner's Insurance & PMI	Total PITI Payment	Maximum Affordable Purchase Price
Davenport	**$42,261**	**$473**	**$179**	**$80**	**$732**	**$110,100**
White Households	$45,704	$546	$207	$80	$833	$127,100
Black Households	$24,309	$93	$35	$80	$208	$21,750
Hispanic Households	$34,505	$309	$117	$80	$506	$72,000
2010 Median Sales Price: $113,625						

Sources: 2006-2010 American Community Survey (B119013, B19013A, B19013B, B190131); Quad Cities Realtor Association Data

Calculations by Mullin & Lonergan Associates, Inc.

In 2010 in Moline, Whites could afford a maximum affordable housing purchase price of $133,550 based on a median household income of $50,816. Hispanics with a median household income of $37,603 had a maximum affordable housing purchase price of $76,500. Blacks could afford a maximum affordable housing purchase price of just $40,850 based on median household income of $29,348. Again, only White households earning the median household income could afford the median sales priced home in Moline.

Based on the data provided in Figure 2-59, Black households would have been able to afford only a fraction of the 110 units that sold for less than $70,000 in 2010, Hispanic households would have been able to afford those 110 units. By comparison, Whites earning the median income would have found a total of 295 units selling for $119,000 or less affordable to them.

Figure 2-62
Maximum Affordable Purchase Price by Race/Ethnicity in Moline, 2010

	Median Household Income	Monthly Mortgage Payment				
		Mortgage Principal & Interest	Real Estate Taxes	Homeowner's Insurance & PMI	Total PITI Payment	Maximum Affordable Purchase Price
Moline	**$49,290**	**$546**	**$312**	**$80**	**$938**	**$127,000**
White Households	$50,816	$574	$328	$80	$982	$133,550
Black Households	$29,348	$176	$100	$80	$356	$40,850
Hispanic Households	$37,603	$329	$188	$80	$597	$76,500
2010 Median Sales Price: $95,000						

Sources: 2006-2010 American Community Survey (B119013, B19013A, B19013B, B190131); Quad Cities Realtor Association Data

Calculations by Mullin & Lonergan Associates, Inc.

In Rock Island, Whites with a median household income of $45,859 had a maximum affordable housing purchase price of $108,850, compared to $55,000 for Hispanics with a median household income of $33,000. Blacks could afford a maximum affordable housing purchase price of $27,850, based on median household income of $26,535. As in Davenport and Moline, only Whites earning the median household income could afford to purchase the median sales priced home in Rock Island in 2010.

Based on the data provided in Figure 2-60, Black and Hispanic households would have been able to afford only a fraction of the 117 units that sold for less than $70,000 in 2010, By comparison, Whites earning the median income would have found a total of 203 units selling for $99,000 or less affordable to them.

Figure 2-63
Maximum Affordable Purchase Price by Race/Ethnicity in Rock Island, 2010

	Median Household Income	Monthly Mortgage Payment				
		Mortgage Principal & Interest	Real Estate Taxes	Homeowner's Insurance & PMI	Total PITI Payment	Maximum Affordable Purchase Price
Rock Island	**$41,475**	**$389**	**$241**	**$80**	**$710**	**$90,500**
White Households	$45,859	$468	$290	$80	$838	$108,854
Black Households	$26,535	$120	$74	$80	$274	$27,850
Hispanic Households	$33,000	$236	$146	$80	$462	$55,000
2010 Median Sales Price: $83,400						

Sources: 2006-2010 American Community Survey (B119013, B19013A, B19013B, B19013I); Quad Cities Realtor Association Data

Calculations by Mullin & Lonergan Associates, Inc.

In Davenport, Moline and Rock Island, ownership of a median sales priced home is unattainable for minorities who earn the median household income.

Based on the number of units sold by price range in 2010, Black and Hispanic households would have had far fewer affordable options available than White households earning the median income.

3. Evidence of Housing Discrimination

This section analyzes the existence of fair housing complaints or compliance reviews where a charge of a finding of discrimination has been made. Additionally, this section will review the existence of any fair housing discrimination suits filed by the United States Department of Justice or private plaintiffs in addition to the identification of other fair housing concerns or problems.

Citizens in the Quad Cities area receive fair housing services from a variety of organizations, including but not limited to the Davenport Civil Rights Commission, the Moline Human Rights Commission, and the Rock Island Human Rights Commission. These groups provide education and outreach, sponsor community events, process fair housing complaints, and in some cases investigate complaints through testing, and/or work to promote a mutual understanding of diversity among residents.

A. Existence of Fair Housing Complaints

A lack of filed complaints does not necessarily indicate a lack of a problem. Some persons may not file complaints because they are not aware of how to file a complaint or where to go to file a complaint. Discriminatory practices can be subtle and may not be detected by someone who does not have the benefit of comparing his treatment with that of another home seeker. Other times, persons may be aware that they are being discriminated against, but they may not be aware that the discrimination is against the law and that there are legal remedies to address the discrimination. Also, households may be more interested in achieving their first priority of finding decent housing and may prefer to avoid going through the process of filing a complaint and following through with it. According to the Urban Institute, 83% of those who experience housing discrimination do not report it because they feel nothing will be done. Therefore, education, information, and referral regarding fair housing issues remain critical to equip persons with the ability to reduce impediments.

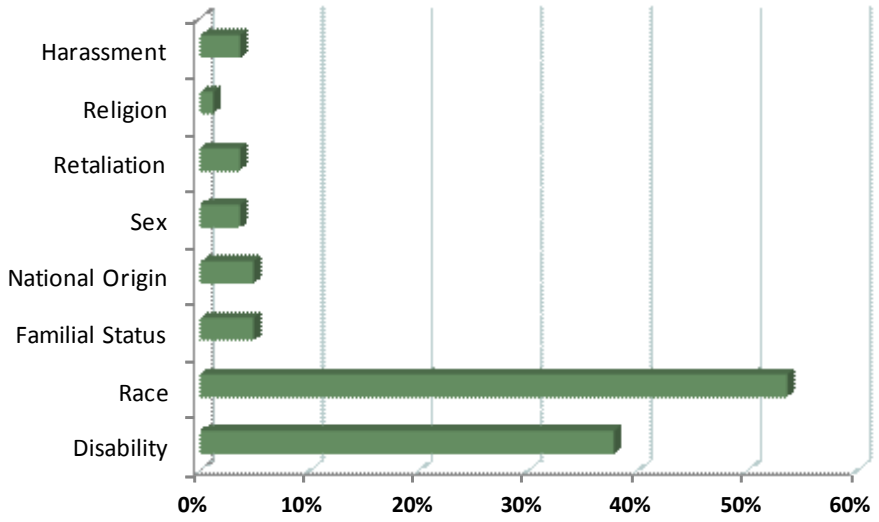
1. U.S. Department of Housing and Urban Development

The Office of Fair Housing and Equal Opportunity (FHEO) at HUD receives complaints from persons regarding alleged violations of the federal Fair Housing Act. Fair housing complaints originating in Davenport, Moline and Rock Island were obtained and analyzed for the period of January 2005 through December 2011.

In total, 82 complaints originating in Davenport, Moline and Rock Island were investigated by HUD during this period, an average of about 12 per year. This does not include cases that were cross-filed with HUD by other agencies, which are examined separately in the following section. Of the 82 HUD cases, 38 originated in Davenport, while 31 originated in Moline and 10 were based in Rock Island. The volume of cases varied by year, from a maximum of 23 across the three cities in 2005 to a minimum of five cases in 2009. There was no clear trend of increase or decrease.

Race was the most common basis for complaint, followed by disability. Of the 82 complaints filed, 12 were filed on two or more bases; as a result, the following chart reflects a higher total. While race was an issue in 25 of 38 cases in Davenport (65.8%), disability represented the most common problem in Moline, cited in 16 of 31 cases (51.6%). In Rock Island, race factored into seven of 10 cases.

Figure 3-1
HUD Complaints by Basis of Discrimination across Three Cities, 2005-11



Across all 82 complaints filed with HUD, discriminatory terms, conditions and privileges in general was the most commonly cited issue, factoring into more than one-third of all cases. Rental terms, conditions and privileges were separately cited in 28% of cases, while refusal to rent was cited in 14.6% of cases. A breakdown of all issues cited appears in Figure 3-2.

Figure 3-2
Issues Cited in HUD Complaints across Three Cities, 2005-2011

Issues Cited	Times Cited	Percent of all Cases
Discriminatory terms, conditions, privileges, services, facilities	30	36.6%
Discriminatory terms, conditions, privileges: Rental	23	28.0%
Refusal to rent or negotiate to rent	12	14.6%
Accessibility	11	13.4%
Discriminatory acts under Section 818 (coercion, etc)	8	9.8%
Other	3	3.7%
Discriminatory advertising	2	2.4%
Refusal to sell or negotiate to sell	1	1.2%
Financing	0	0.0%

Source: HUD FHEO

In terms of result, of the 78 complaints that were resolved as of December 2011, 12 (15.4%) were conciliated with a successful settlement. A complaint is considered conciliated when all of the parties to the complaint enter into a conciliation agreement with HUD. Such agreements include benefits for the complainant, and affirmative action on the part of the respondent, such as civil rights training. HUD has the authority to monitor and enforce these agreements. The settled cases covered a wide variety of issues, as six

involved race and three involved disability, while national origin, religion and sex accounted for one case each. The complaints settled through conciliation occurred in all of the cities; nine were in Davenport, two were in Moline and one was in Rock Island.

Of the total closed cases, 36 (45.2%) were found to be without probable cause. This occurs when the preponderance of evidence obtained during the course of the investigation is insufficient to substantiate the charge of discrimination. Another 27 cases (34.2%) were administratively closed, due to complaint withdrawal before or after resolution, judicial dismissal or the complainant's refusal to cooperate.

Caution should be used when interpreting complaints that are administratively closed. This resolution does not always mean that housing discrimination has not occurred. In the case of a complainant withdrawing a complaint, an uncooperative complainant, or a complainant who cannot be located, it is possible that the complainant changed her mind, decided against the trouble of following through with the complaint, chose to seek other housing without delay, or some other reasons.

One case originating in Moline in 2005 resulted in a judicial consent order. The case was filed on the basis of race and alleged a discriminatory refusal to negotiate for rental.

2. State Enforcement Agencies

In both Iowa and Illinois, housing discrimination complaints are accepted and processed by state agencies empowered to enforce human rights laws. The Illinois Department of Human Rights (IDHR) enforces the Illinois Human Rights Act, which in addition to the classes covered by the federal Fair Housing Act, protects on the bases of ancestry, sexual orientation, unfavorable military discharge, marital status, age and order of protection status. The Iowa Civil Rights Commission (ICRC) enforces the Iowa Civil Rights Act of 1965, which includes sexual orientation, gender and creed beyond the federally protected classes. HUD has determined that both of these laws are substantially equivalent to the Fair Housing Act, signifying that they provide substantive rights, procedures, remedies and judicial review provisions that mirror the Act. As a result, both IDHR and ICRC work with HUD to coordinate investigation and enforcement activities. The procedures of both agencies in processing complaints are explained in the introductory section of the AI. Both IDHR and ICRC provided data on housing discrimination complaints received between January 2005 and November 2011 for analysis in the AI.

During that span, IDHR received 46 total complaints with respondents in Rock Island County, including 16 complaints against respondents in Moline, eight against respondents in Rock Island and one against a respondent in Davenport. Of the 25 total complaints with respondents in the three cities, disability was the most commonly cited basis. Physical disabilities factored into seven cases, and mental disabilities factored into three. All of the eight race-related complaints were on behalf of Black households. Familial status, sex/sexual harassment and retaliation were cited in two cases each, and one case was filed on the basis of Hispanic ethnicity. Discriminatory terms was the most common issue cited in IDHR's cases in the three cities, involved in 10 of the 25 complaints. This was followed by discrimination in rental transactions (five cases) and failure to accommodate in rental facilities (two cases).

The ICRC provided data on 30 cases originating in Davenport. Race was a much more common basis for complaint, factoring into 16 cases. As with IDHR's cases, all of the complainants in race-related cases were Black. Disability was cited in 11 cases, and Hispanic origin was cited in six. The only other basis for complaint was gender, cited in one case. Most cases were related to rental properties, involving issues of eviction, refusal

to rent and alleged discriminatory terms and conditions. ICRC noted details on case outcomes, indicating its role in assisting to negotiate settlements. For example, a claim of discriminatory advertising resulted in a settlement that required management to complete training. In total, such satisfactory adjustments were the outcome of seven cases. Many cases were closed with a finding of no probable cause (18 of 30) or due to administrative reasons (four of 30). ICRC issued one finding of probable cause in a complaint of refusal to rent and discriminatory terms and conditions on the basis of race. In this case, ICRC forwarded the case to the State Attorney General's office for further action.

3. Fair Housing Assistance Program Agencies

Agencies that enforce state or local laws certified by HUD to be as substantially equivalent to the federal Fair Housing Act are eligible to participate in HUD's Fair Housing Assistance Program (FHAP). Participation allows such agencies the opportunity to receive funding to support a variety of fair housing administrative and enforcement activities, including complaint processing, training, implementation of data and information systems and other special projects. As HUD's partners in fair housing enforcement, FHAP agencies cross-file the discrimination complaints they receive with HUD and work with HUD to determine the level at which cases are investigated and resolved.

Davenport's Civil Rights Commission (DCRC) works as a FHAP at the local level, and Iowa's Civil Rights Commission and the Illinois Department of Human Rights do so at the state level. Data on complaints was requested from both state agencies for analysis in the AI, but information was not received. Davenport submitted data on 245 complaints filed with DCRC between January 2005 and December 2011. Though many of these complaints were cross-filed with HUD, DCRC complaints were subtracted from the HUD complaints in order to avoid duplication of analysis.

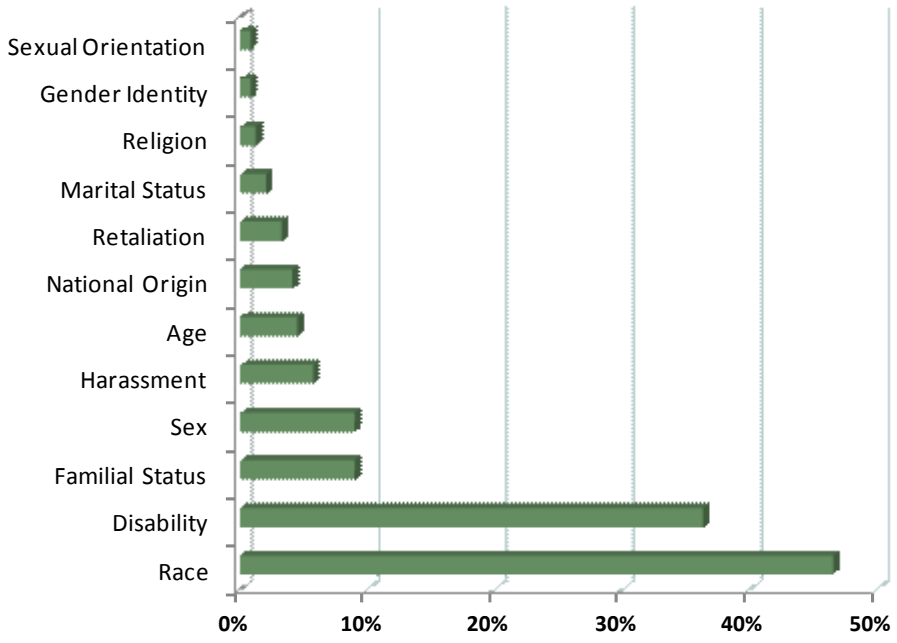
The prevalence of housing discrimination complaints in Davenport collected by the DCRC, as compared to much lower number of local complaints in Moline and Rock Island, does not necessarily indicate a relatively higher presence of housing discrimination in Davenport. Differences in public awareness and perceived access to recourse as well as agency capacity and program administration are also possible explanations for what is a relatively large number of complaints, as well as Davenport's larger population (99,685 in 2010, compared to 43,483 in Moline and 39,018 in Rock Island).

The 245 complaints reported by DCRC average out to 35 per year, though the actual number filed per year varied between 25 in 2009 and 58 in 2005.

Race was the predominant basis among complaints filed with DCRC, factoring into 45.5% of all cases.[1] The next most common basis was disability, which was cited in 36.3% of cases. Familial status and sex each factored into 9% of cases, while smaller proportions of cases were related to harassment, national origin, retaliation and religion. DCRC is able to accept complaints on some bases not protected by the federal Fair Housing Act that are covered by local law, including age, marital status, gender identity and sexual orientation. These types of cases represent a relatively small portion of DCRC's case load. However, it is important that DCRC provides an avenue for persons experiencing discrimination on these bases who seek recourse.

[1] For consistency to compare with the HUD cases, race and color were considered within the same category, though DCRC counts both separately.

Figure 3-3
DCRC Complaints by Basis of Discrimination, 2005-2011



Conciliation agreements are more common in DCRC (and DCRC/HUD) cases than in the HUD-only cases. In fact, this was the most prevalent outcome, occurring in 88 cases, or 35.9%. An additional 79 cases, or 32.2%, were administratively closed. This category includes case transfers and closure "for lack of interest" as well as withdrawals both with and without resolution. About one-quarter of cases were found to be without probable cause. Three cases are currently open, two of which involve Department of Justice lawsuits on the basis of disability. In two separate cases, findings of probable cause, both related to disability, resulted in the elevation of cases to federal district court.

4. Local Fair Housing Advocates

In addition to the DCRC, Human Rights Commissions in Moline and Rock Island provide counsel to persons who have experienced alleged discrimination. These agencies and their processes for accepting and referring complaints are examined fully in the Fair Housing Organizations section of the AI.

While the Moline Human Rights Commission does not investigate complaints, it accepts complaints and advises complainants that to realize any action, they must also file a complaint with the Illinois Department of Human Rights or the appropriate federal agency. For the purposes of the AI, Moline submitted two housing-related complaints it received, both from related callers living in the same household on the same day in 2009, alleging discriminatory refusal to rent on the basis of disability. In response, the Commission referred the caller to the state Human Rights Commission and to the City's economic development coordinator.

In order to become effective fair housing advocacy organizations, the human rights commissions in Moline and Rock Island must reorganize their agencies and identify their fair housing roles.

B. Patterns and Trends in Fair Housing Complaints

Race is the primary basis of discriminatory complaints filed with HUD and the Davenport Civil Rights Commission, followed by disability. Complaints on other grounds were far less common by comparison. The volume of race-related housing complaints and the success of cases alleging disability-related discrimination, which in many cases involves a refusal to make or allow reasonable accommodations, indicate a need for continued education and outreach regarding fair housing rights and responsibilities. The relatively low number of complaints to DCRC on the additional locally protected bases of marital status, age, sexual orientation and gender identity could indicate that awareness of these protections is low.

Analysis of the fair housing complaints received by HUD and the Davenport Civil Rights Commission since 2005 indicates the persistence of discrimination in the housing market, especially regarding race and disability.

The data show that the private market could benefit from further education and outreach regarding the rights and responsibilities related to fair housing laws. Additionally, to the extent that resources are available to support paired testing, an examination of the rental market could provide information to inform future fair housing planning.

C. Existence of Fair Housing Discrimination Suit

There are no pending fair housing discrimination suits or complaints against the cities of Davenport, Moline or Rock Island.

D. Determination of Unlawful Segregation

There is no pending unlawful segregation order involving the cities of Davenport, Moline or Rock Island.

4. Evaluation of Public Sector Policies

The analysis of impediments is a review of impediments to fair housing choice in the public and private sector. Impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, national origin, sexual orientation, gender identity, or marital status that restrict housing choices or the availability of housing choices, or any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, national origin, sexual orientation, gender identity, or marital status. Policies, practices or procedures that appear neutral on their face but which operate to deny or adversely affect the provision of housing to persons of a particular race, color, religion, sex, disability, familial status, national origin, sexual orientation, gender identity, or marital status may constitute such impediments.

In addition to the aforementioned federal protected classes, there are state and local fair housing laws that specify other protected classes. The Iowa Civil Rights Act names the following additional protected classes: creed and retaliation against anyone for having filed a charge, complained about discrimination or participated in an investigation or court proceeding involving discrimination. The City of Davenport has the following additional protected classes: age, marital status, gender identity sexual orientation and protection from retaliation against anyone for having filed a charge, complained about discrimination or participated in an investigation or court proceeding involving discrimination.

In Illinois, the Illinois Human Rights Act adds sexual orientation, marital status, military status, age, protection from retaliation and ancestry to the list of federally mandated protected classes.

An important element of the AI is an examination of public policy in terms of its impact on housing choice. This section evaluates the public policies in the three entitlement cities to determine opportunities for furthering the expansion of fair housing choice.

A. Policies Governing the Investment of Entitlement Funds

From a budgetary standpoint, housing choice can be affected by the allocation of staff and financial resources to housing-related programs and initiatives. The decline in federal funding opportunities for affordable housing for lower-income households has shifted much of the challenge of affordable housing production to state and local government decision makers.

The federal entitlement funds that Davenport, Moline, and Rock Island receive from HUD may be used for a variety of activities to serve an array of needs, as follows:

Community Development Block Grant (CDBG): The primary objective of this program is to develop viable urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for persons of low and moderate income levels. Funds can be used for a wide array of activities, including: housing rehabilitation, homeownership assistance, lead-based paint detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers, public services, rehabilitation of commercial or industrial buildings, and loans or grants to businesses.

Home Investment Partnership Program (HOME): The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for low and moderate income households. HOME funds can be used for activities that promote affordable rental housing and homeownership for low and moderate income households, including reconstruction, moderate or substantial rehabilitation, homebuyer assistance, and tenant-based rental assistance.

The following is an examination of the application processes and project selection criteria that the three cities employ to determine how to allocate their CDBG funds, and, in the case of Davenport, HOME funds.

1. Project Proposal and Selection

In Davenport, the lead agency in the planning and administration of federal entitlement programs is the city's Community Planning & Economic Development Department (CPED). CPED prepares the Five-Year Consolidated Plan, which establishes policies and priorities to govern entitlement spending. The current Consolidated Plan is effective from July 1, 2010 to June 30, 2014.

Davenport receives CDBG funds from HUD, and it allocates these funds on a competitive basis. Every year, CPED conducts a public meeting/workshop at which it distributes CDBG funding application packets and information on the application process. The application packet includes statements of the general areas of need identified in the city's Five-Year Consolidated Plan and the city's objectives for the upcoming CDBG program year.

The city has a 15-member citizen advisory committee (CAC) that reviews the CDBG funding applications received. CDBG applicants make presentations to the CAC. The CAC makes application selection recommendations to City Council, which usually accepts CAC's recommendations.

The application packet lists the criteria used by the CAC to evaluate CDBG project applications. These criteria do not explicitly include affirmatively furthering fair housing factors. However, the application packet includes a statement of certifications that applicants must sign and submit with their applications. This statement of certifications includes a requirement to refrain from discrimination against any program participant, applicant, or employee that is a member of any of the federal, state, or city fair housing protected classes. The statement of certifications also stipulates that applicants must agree to maintain records to verify information regarding persons or households that participate or benefit from a grant-funded activity including data on income, race/ethnicity, gender of the head of household, and residence. Applicants must also agree to be subject to at least one monitoring visit.

In order to inform and educate its sub-recipients about affirmatively furthering fair housing responsibilities, the city holds an annual mandatory training workshop for CDBG sub-recipients. This workshop includes a fair housing session conducted by staff of the Davenport Civil Rights Commission.

The city also provides fair housing training to potential developers and landlords as part of the mandatory landlord training class required by the city to obtain rental licenses. This includes landlords who operate HOME and CDBG-funded rental projects.

To affirmatively further fair housing, the city's agreements with sub-recipients include a stipulation that sub-recipients comply with the Fair Housing Act, the Iowa Civil Rights Act, and the Davenport Civil Rights Ordinance. The sub-recipient agreements also include remedies for non-compliance with any terms of the agreement, including failure to affirmatively further fair housing. These remedies include issuance of written warnings, withholding of funds, grant amount adjustments, reimbursement of grant funds, termination of funds, and prohibition from future participation in the CDBG program.

Davenport also receives HOME funds from HUD. The city uses HOME funds for owner-occupied rehabilitation, acquisition/rehab/resale (its Urban Homestead Program), and for the construction or rehabilitation of rental property. The city sets aside at least 15% of its

annual HOME allocation for eligible Community Housing Development Organization (CHDO) activities. Davenport provides HOME funds to CHDOs for its Urban Homestead Program and for construction or rehabilitation of rental property.

Davenport solicits HOME applications in several ways. For owner-occupied rehabilitation, the city uses numerous means to distribute information about its HOME-funded owner-occupied rehabilitation program—the city's website, cable access channels, notices in quarterly sewer bills, mailings, flyers in CPED's office, referrals from nonprofit organizations, and occasional targeted mailings. There is no application deadline for these funds; the city accepts applications on a rolling basis. These owner-occupied rehabilitation applications are evaluated and approved by CPED staff. No Council action is required.

Acquisition/rehab/resale projects are either done by the city or by qualified CHDOs. The city works with CHDOs in identifying potential projects, and consideration of HOME funding typically begins as the city or CHDO is considering acquisition for a project.

The city solicits rental property projects in a variety of ways. The city maintains contact with CHDOs to identify potential projects that the CHDOs are considering. The city indicates on its website and cable access channels that the city may have assistance available for rental housing projects. The city receives regular inquiries from property owners and developers who are interested in doing a rental property project of some kind. The city consults with these potential housing developers to identify the best funding matches for the types of projects that the developers are interested in. If the project is a good fit for HOME funding, and the developer completes a HOME funding application, then CPED staff reviews the application for potential HOME rental project funding.

For large rental projects, developers are required to hold neighborhood meetings and/or survey the neighborhood about the proposed project and to report on the outcome of the meeting/survey. This neighborhood consultation must occur prior to CPED's consideration of the developer's HOME funding application. Large rental projects require City Council ratification of the CPED's staff recommendations. Smaller rental projects, e.g., four or fewer units, are evaluated and approved by CPED staff. They do not require Council action.

Fair Housing Best Practices:

Davenport provides fair housing training to rental property owners/managers as part of the mandatory training class required by the city to obtain rental licenses.

For proposed large HOME rental projects, developers are required to hold neighborhood meetings and/or survey the neighborhood about the proposed project and to report on the outcome of the meeting/survey.

In Moline, the city's Planning & Development Department (PDD) is the lead agency for the planning and administration of CDBG entitlement program funds. PDD prepares the city's Five-Year Consolidated Plan, which establishes policies and priorities to govern entitlement fund spending. The current Consolidated Plan covers the period from January 1, 2010 to December 31, 2014.

Moline receives only CDBG funds from HUD. The city has a seven-member Citizen Advisory Council on Urban Policy (CACUP) that solicits, accepts, and evaluates CDBG funding applications. CACUP then makes application funding recommendations to City Council, which usually accepts CACUP's recommendations.

The city solicits applications for allotments of its CDBG entitlement funds through community meetings, mailings, and media releases. The city provides CDBG application packets and information on the application process at the various community meetings attended by city staff. The application packet includes a statement of the city's community development objectives, the city's CDBG program strategy, and a list of eligible CDBG activities.

The application packet also lists the CDBG national objectives—benefit to low or moderate income persons or households, elimination of slums or blight, and urgent community need—as standards to determine project eligibility, but it does not list any specific criteria used by the CACUP to evaluate CDBG project applications.

Most of the city's annual CDBG allocation is earmarked for its established housing program. CACUP's main discretion lies in how to spend the 15% of the CDBG funds designated for public services. According to city staff, CACUP makes its funding recommendations based on what committee members want, not the needs identified in the city's Consolidated Plan. CACUP's preference would be to give each group that applies for funding $1,000, but the CDBG funds should be allocated based on demonstrated need, not the easiest way to divide the money among many applicants.

The application packet does not contain any mention of affirmatively furthering fair housing choice as a factor in the city's consideration of CDBG funding applications. However, the application packet includes a statement that approved applicants must sign a sub-recipient agreement with the city regarding use of CDBG funds. This sub-recipient agreement includes provisions requiring compliance with the Title VIII of the Civil Rights Act of 1968, as amended, but does not specify that this is the Fair Housing Act. The sub-recipient agreement also includes a requirement for the sub-recipient to maintain records documenting compliance with the fair housing and equal opportunities components of the CDBG program.

Applicants must also agree to be subject to monitoring by the city. The sub-recipient agreement includes remedies for non-compliance with any terms of the agreement, which include failure to affirmatively further fair housing choice. These remedies include reimbursement of grant funds, suspension or termination of funds, and prohibition from further participation in the CDBG program.

In order to inform and educate its sub-recipients about affirmatively furthering fair housing choice responsibilities, the city holds an annual fair housing mandatory training workshop for potential CDBG sub-recipients.

The city of Moline should have an application evaluation checklist to evaluate CDBG applications received.

A clearly stated list of objective criteria would assist the CACUP members in conducting a far and equitable evaluation of all funding applications

Rock Island's Planning & Redevelopment Division (PRD) of the city's Community and Economic Development Department is the lead agency for the planning and administration of the city's CDBG federal entitlement program funds. PRD prepares the city's Five-Year Consolidated Plan, which contains guidelines and priorities to govern entitlement fund spending. The current Consolidated Plan is effective from April 1, 2008 March 31, 2013.

Each year, Rock Island City Council approves and publishes a set of policies for allocating CDBG funds. These annual policies cover four broad policy areas: housing and neighborhood improvement, economic development activities, social services and agency allocations. These policies provide guidelines for the city's 11-member Citizen Advisory Council (CAC) that evaluates CDBG funding applications. The CDBG funding application process is an open process, but almost all of the projects selected are those submitted by city staff. CAC makes recommendations to City Council regarding project funding selection, and City Council sometimes modifies CAC's recommendations, but only in a minimal manner.

In Rock Island, the city solicits applications for both its CDBG entitlement funds and its gaming funds from the State of Illinois through direct mailings, email, news releases, website postings and local cable access channels. Each year, the city publishes packets that contain information on the CDBG application process and the city's policies for allocating funds. These packets are available on the city's website and also through direct mailings to more than 60 organizations which, in the past, have received CDBG funding, have submitted CDBG funding applications, or have shown basic interest in the CDBG program. Copies of these documents are also available at City Hall.

The funding policies packet includes information on the types of projects that the city will consider for funding and a statement of the general criteria that the CAC will use in evaluating funding requests. CAC's application evaluation criteria include an applicant's past performance and capacity, project cost effectiveness, and project objectives. The CAC application review process includes brief oral presentations made by the applicants.

Neither the application packet nor the funding allocation policy packet contains any mention of affirmatively furthering fair housing choice as a factor in the city's consideration of CDBG funding applications. In addition, these documents fail to mention that approved applicants must sign a sub-recipient agreement with the city regarding use of CDBG funds.

The city's sub-recipient agreement includes provisions requiring compliance with the Title VIII of the Civil Rights Act of 1968, as amended, to affirmatively further fair housing in the sale or rental of housing, the financing of housing, and the provision of brokerage services within the city's jurisdiction. The sub-recipient agreement also requires a sub-recipient to maintain records as required by HUD, but does not make any specific reference to records documenting fair housing compliance.

The sub-recipient agreement includes compliance with Executive Order 11063 which prohibits discrimination because of race, color, religion (creed), sex or national origin in the sale or rental of residential property and related facilities when such facilities are provided in whole or in part with federal assistance

Applicants must also agree to be subject to monitoring by the city. The sub-recipient agreement includes remedies for non-compliance with any terms of the agreement, which would include suspension or termination of the agreement.

In order to inform and educate its sub-recipients about affirmatively furthering fair housing choice responsibilities, the city holds an annual mandatory training workshop for potential CDBG sub-recipients.

The CDBG funding application packets for the three cities do not include any mention of affirmatively furthering fair housing choice as one of the criteria used to evaluate funding applications, but each of the cities holds an annual mandatory training workshop to explain the fair housing responsibilities of CDBG sub-recipients.

In Moline and Rock Island, CDBG sub-recipient agreements should be amended to include explicit references to sub-recipients' need to comply with the Fair Housing Act and state and local fair housing laws.

2. Geographic Distribution of Activities

Map 4-1 provides a geographical illustration of recent CDBG- and HOME-funded housing activities in the city of Davenport. Davenport uses CDBG and HOME funds for a variety of housing activities, including a down payment assistance program, an owner-occupied housing rehabilitation program, an accessibility program, and various housing developments in partnership with area CHDOs. As the map shows, the city's CDBG and HOME investments are scattered throughout the city and are located in both impacted and non-impacted areas.

Map 4-2 provides a geographical illustration of housing programs funded in the city of Moline. The city uses CDBG funds for its Single Family Owner-Occupied Rehab Program and State HOME funds for its Small Rental Properties Program. IT also uses State Healthy Homes Program funds for residential lead-based paint hazard reduction. These investments were scattered in both impacted and non-impacted areas.

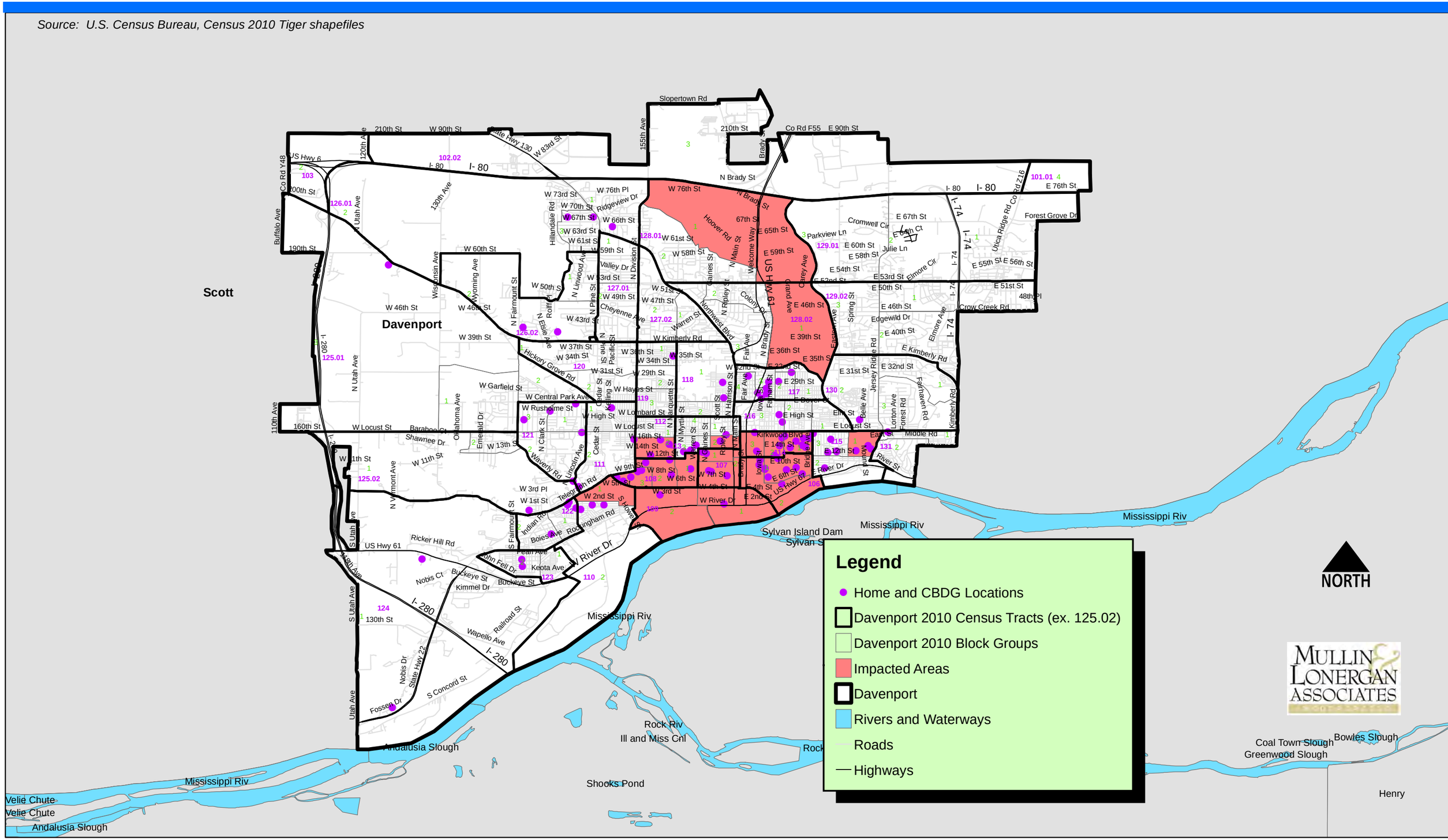
Map 4-3 provides a geographic illustration of housing programs funded in the city of Rock Island between 2007 and 2011. The city uses CDBG funds for a wide array of housing programs, including owner-occupied rehabilitation and lead-based paint abatement. Specifically, Rock Island offers several types of home improvement and housing rehabilitation loans, including the Emergency Deferred and the Emergency Standard Payment Loans, the Roof Deferred and the Roof Standard Payment Loans, the Targeted Rehabilitation Loan, the Rental Property Improvement Loan, and the Tax Increment Financing Loan. Almost all of the city's CDBG investments in housing activities over the last five years were located in the section of the city north of Rock River. These investments were scattered in both impacted and non-impacted areas. Only one housing activity in Rock Island over the past five years was located in the section of the city south of Rock River.

Map 4-4 indicates the location of recent Habitat for Humanity projects in the three cities.

Map 4-1: CDBG and HOME Funded Housing Locations: City of Davenport, Iowa

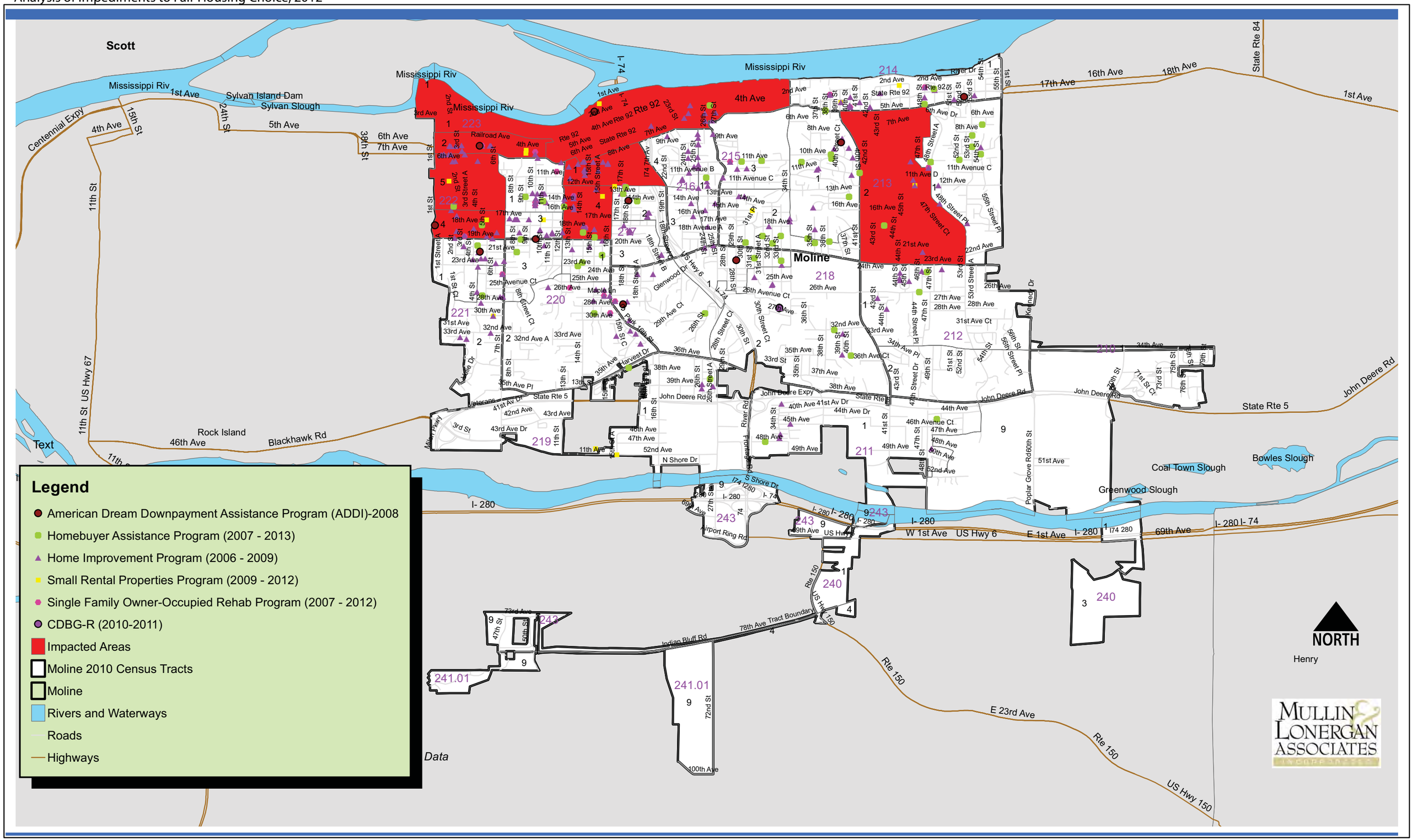
Analysis of Impediments to Fair Housing Choice, 2010

Source: U.S. Census Bureau, Census 2010 Tiger shapefiles



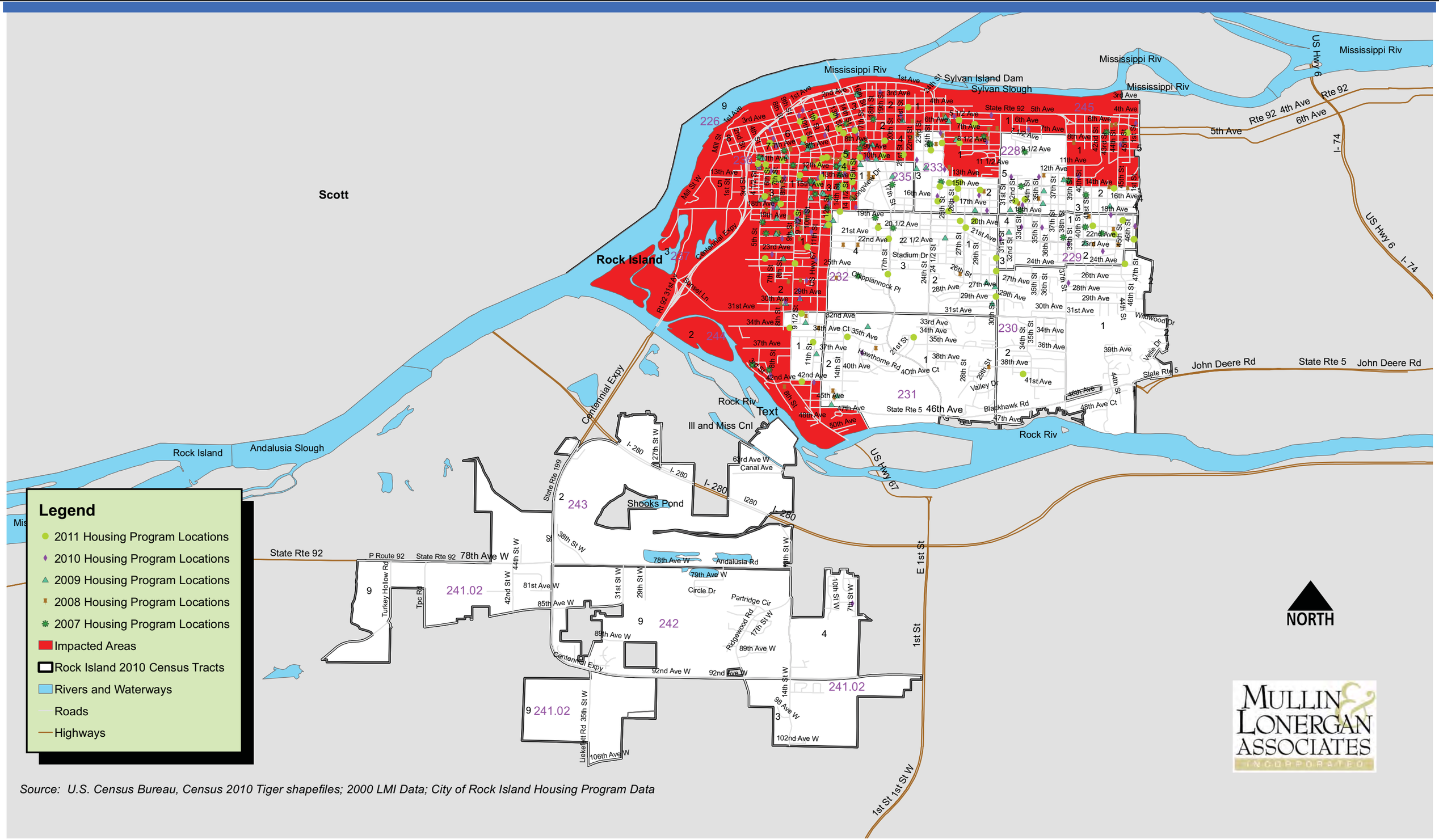
Map 4-2: City Funded Housing Programs: City of Moline, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



Map 4-3: City Funded Housing Programs 2007 - 2011: City of Rock Island, Illinois

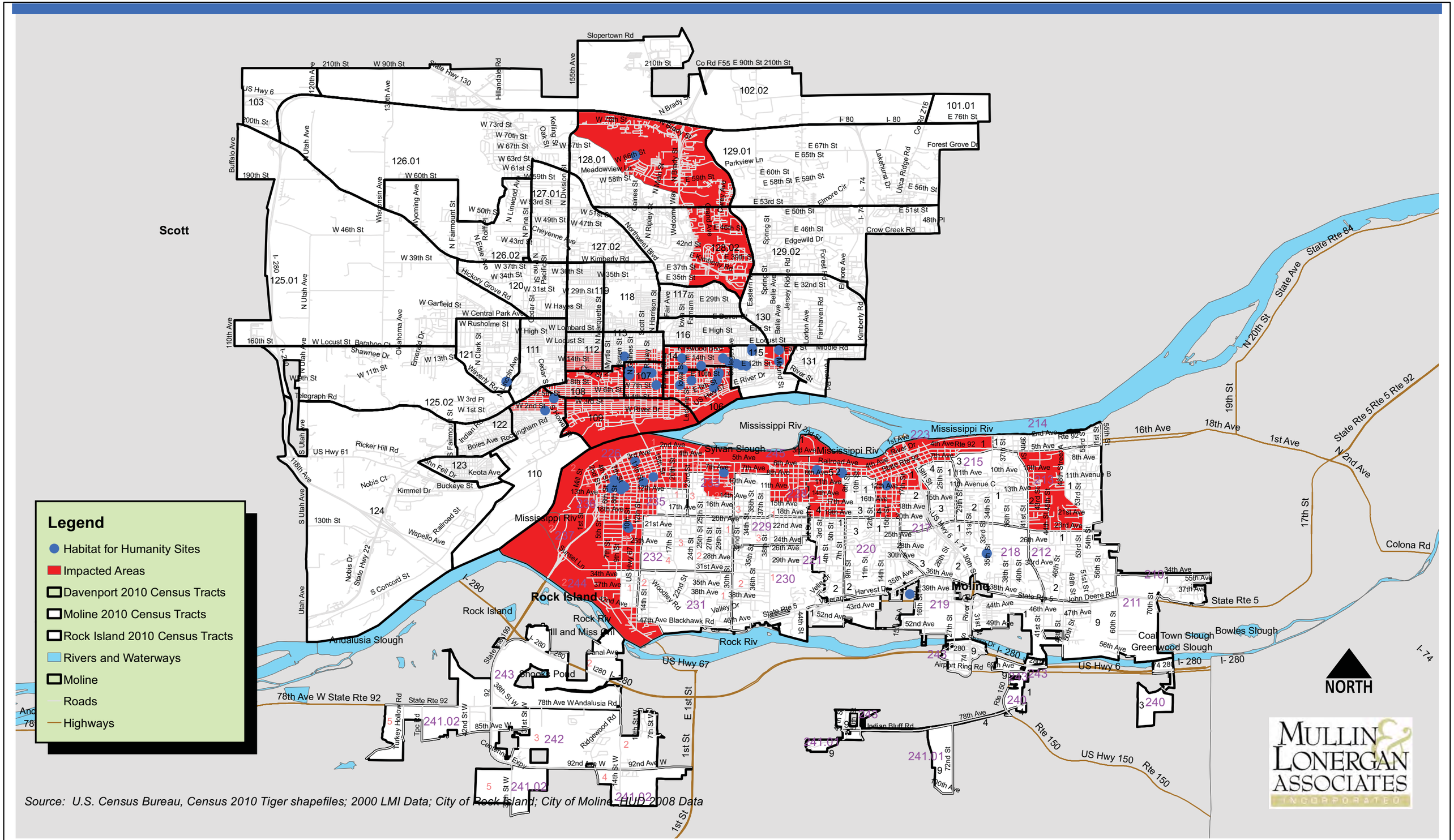
Analysis of Impediments to Fair Housing Choice, 2012



Source: U.S. Census Bureau, Census 2010 Tiger shapefiles; 2000 LMI Data; City of Rock Island Housing Program Data

Map 4-4: Habitat Housing Locations: Cities of Rock Island and Moline, Illinois and Davenport, Iowa

Analysis of Impediments to Fair Housing Choice, 2012



Source: U.S. Census Bureau, Census 2010 Tiger shapefiles; 2000 LMI Data; City of Rock Island; City of Moline; HUD 2008 Data

3. Consolidated Plans and CAPERs

Entitlement communities like the cities of Davenport, Moline, and Rock Island are required to prepare Five-Year Consolidated Plans (CPs) and Annual Plans (APs) that describe activities to be undertaken with CDBG and HOME funds. At the end of each fiscal year, a Consolidated Annual Performance and Evaluation Report (CAPER) is developed by the cities to report on their progress to achieve the housing and community development goals set forth in their respective CPs and APs and to affirmatively further fair housing. The following narrative includes an analysis of how the three cities have affirmatively furthered fair housing choice through their investment of federal entitlement funds.

The city of Davenport established the following housing objectives in its FY 2010-2014 Consolidated Plan:

- Reduce the number of under-occupied, abandoned, or vacant buildings and properties through adaptive reuse and infill, and
- Improve housing options in the downtown district.

In its FY 2010 Annual Action Plan, the city of Davenport allocated resources to a variety of housing activities, including owner-occupied rehabilitation, rental rehabilitation, homebuyer education, downpayment assistance, and acquisition/rehabilitation. In addition to federal CDBG and HOME funds, the city of Davenport uses capital improvement program funds for the HAPPEN (Housing Assistance to Protect and Preserve our Established Neighborhood) program.

The city is also committed to providing lead abatement through a three-year HUD Lead Hazard Control grant it received, through which it will remediate lead paint hazards in approximately 200 homes.

The city of Davenport's CAPER for FY 2010 was reviewed as part of this analysis. In FY 2010, Davenport spent approximately $1,474,433 in CDBG funds on housing-related activities to assist 1,885 individuals and families. In addition to CDBG activities, the City of Davenport receives HOME funding to provide affordable housing units. In FY 2010, the city expended $921,108 in HOME funds to assist with the construction or rehabilitation of 62 units of affordable housing. Over half of these units (35 total) were completed by the end of the FY 2010 program year.

The following list provides a summary of the city of Davenport's housing accomplishments outlined in its FY 2010 CAPER:

- Provided 50 home rehabilitation loans to homeowners throughout the city,
- Rehabilitated 18 homes through loans provided by sub-recipient agencies,
- Completed six Urban Homestead and two CHDO Homestead homes, and
- Entered into service 11 new low to moderate income HOME rental units.

The city of Davenport supports the work and staff of the Davenport Civil Right Commission (DCRC) through city general funds ($277,000 in 2011) and the city's Trust and Agency Fund ($75,626 in 2011 for staff benefits). In 2011, the city did not use CDBG funds to support the DCRC.

The city of Moline established the following community development objectives as priority needs in its FY 2010-2014 Consolidated Plan:

- Provide safe, affordable rental housing to meet low-income residents' most urgent needs, including housing for families with children and single-room occupancy units for individuals now living in shelters or at-risk of homelessness,
- Provide funds for repairs to owner-occupied households for low to moderate income homeowners,
- Provide downpayment assistance to qualified low income, first-time homebuyers,
- Provide funds for rental housing rehabilitation, and
- Prevent and/or eliminate vacant properties that blight Moline's neighborhoods through rehabilitation and strategic demolition where rehab is not structurally or economically feasible.

The city of Moline's FY 2010 CAPER, the first program year of the current five-year strategic planning period, was reviewed for the AI. During FY 2010, the city of Moline expended $961,863.16 in CDBG funds and $43,837.41 in federal HOME funds. Moline made substantial progress towards addressing the housing priority needs identified in its FY 2010-2014 Consolidated Plan. The following list summarizes the activities completed by the city in FY 2010:

- Funded rehabilitation activities for 69 properties through various funding sources including CDBG, CDBG-R, NSP2, and the Lead Hazard Control (LHC) Program
- Assisted seven homebuyers with closing cost and downpayment assistance
- Addressed housing issues through the Neighborhood Abatement Program, Code Enforcement, and the Neighborhood Partnership Committee
- Rehabilitated two units through the state-funded Small Rentals Property Program (SRPP)
- Assisted 44 families through the LHC Program, including three occupied rental units, six vacant units, and 35 owner-occupied units
- Assisted 12 families through the Community Housing Services Program
- Assisted one family through the Single Family Owner Occupied Rehabilitation Program

In recent years, the city of Moline has not used CDBG funds to support fair housing activities. The city does provide in-kind staff services to the Moline Human Rights Commission to perform administrative work.

The priorities outlined in the city of Rock Island's FY 2008-2013 Consolidated Plan addressed barriers to affordable housing and targeted low and moderate income homeowners and renters. The city of Rock Island included the following housing priorities and related actions in its 2008-2013 Consolidated Plan:

- Promote, increase, and maintain homeownership for low and moderate income households through the following actions:
- Offer downpayment assistance,
- Offer homebuyer classes and credit restoration programs,
- Rehabilitate owner-occupied housing units,

- Provide new homeowner opportunities through infill housing and the development of the downtown area,
- Utilize Section 8 vouchers for homeownership,
- Remediate homes with lead based paint, and
- Provide foreclosure prevention to households at risk of foreclosure.
- Provide decent, affordable housing for renters with low and moderate incomes through the following actions:
- Rehabilitate rental units to improve quality,
- Provide rental subsidies through Section 8 and emergency rental assistance programs, and
- Administer the Small Rental Properties Program (SRPP) which provides funds for housing rehabilitation.

Rock Island's most recent CAPER from FY 2009 was reviewed as part of this analysis. The city expended a total of $553,100 in FY 2009 and prior year CDBG funds towards its priority to promote, increase, and maintain homeownership among LMI households. A total of 144 total units were assisted with these funds. Specifically, housing units were rehabilitated through the city's emergency rehabilitation programs, roof replacement programs, and targeted rehab loan programs, among others.

In regard to its housing priority to provide decent and affordable rental housing to LMI households, the city completed several activities to develop standard affordable rental housing. The city of Rock Island spent $11,740 in CDBG funding and $4,398 in other funds toward its Rental Property Improvement Program through which 2 housing units were rehabilitated in FY 2009. The city also continued to operate its Rental Property Inspection Program throughout 2009-2010. During the program year, the city completed over 2,000 inspections.

The city of Rock Island has not traditionally allocated CDBG funds for fair housing activities. The city's Department of Community and Economic Development does provide in-kind staff support to the Rock Island Human Rights Commission. The city allocates 15% of its annual CDBG allocation for public services, but this entire allotment of public service funds is earmarked for the King Community Center.

The city receives $50,000 annually from State of Illinois gaming fund revenues. The city uses this money to fund a variety of public services, and fair housing activities could be funded through this source.

The cities of Moline and Rock Island should allocate 1% to 3% of their annual CDBG entitlement grants for fair housing activities.

4. Affirmative Marketing Policy

As a recipient of CDBG and/or HOME funds, the cities of Davenport, Moline and Rock Island are required to adopt affirmative marketing procedures and requirements for all CDBG and HOME-assisted housing with five or more units. Such a plan should include:

- Methods of informing the public, owners, and potential tenants about fair housing laws and the city's policies,
- A description of what the owners and/or the state will do to affirmatively market housing assisted with CDBG or HOME funds,
- A description of what the owners and/or city will do to inform persons not likely to apply for housing without special outreach,
- Maintenance of records to document actions taken to affirmatively market CDBG- and HOME-assisted units and to assess marketing effectiveness, and
- A description of how efforts will be assessed and what corrective actions will be taken where requirements are not met.

The cities of Davenport, Moline and Rock Island do not currently have an affirmative marketing policy in place.

Federal regulations require grantees such as the cities of Davenport, Moline and Rock Island to adopt affirmative marketing procedures and requirements for all CDBG and HOME-assisted housing with five or more units. The three cities should create and adopt such a policy for their respective CDBG and/or HOME programs.

Acquisition, disposition, rehabilitation, construction, and homeownership assistance are all CDBG-and HOME-eligible housing activities. The three cities should create and adopt affirmative marketing policies. The creation of an affirmative marketing policy in each community will ensure that affirmative marketing procedures and practices are in place when needed.

5. Site and Neighborhood Selection Policy

Recipients of HOME funds are required to administer their programs in compliance with the regulations found at 24 CFR 983.6(b), known as the Site and Neighborhood Standards. These standards address the site location requirements for newly constructed rental units financed with HOME funds.

Site selection for HOME-assisted construction of new rental units or rehabilitation of existing units must comply with several standards, including among other things, promoting greater choice of housing opportunities and avoiding undue concentration of assisted persons in areas containing a high concentration of LMI persons. With few exceptions, site selection must include a location that is not in an area of minority concentration.

As a recipient of HOME funds from HUD, the city of Davenport is required to have a site and neighborhood selection policy. Currently, Davenport does not have any formal site or neighborhood standards in place. Davenport's HOME funds are typically used for owner-occupied housing rehabilitation and CHDO set-aside for rental or for-sale housing rehabilitation or construction.

In accordance with HUD's HOME program regulations at 24 CFR 92.202, the city of Davenport, as a recipient of federal HOME funds, should prepare a written policy and site checklist that encompasses the requirements at 24 CFR 983.6.

The checklist and requirements should be incorporated as part of the application review and approval process for all applicable HOME-assisted projects. All housing providers, builders, and developers should receive a copy of the policy and checklist as part of the HOME application package. HUD's site and neighborhood standards should also be incorporated into the city's written agreements with developers, sub-recipients, and CHDOs. Such a policy will facilitate the city's goals toward affirmatively furthering fair housing.

B. Appointed Boards and Commissions

A community's sensitivity to fair housing issues is often determined by people in positions of public leadership. The perception of housing needs and the intensity of a community's commitment to fair housing-related goals and objectives are often measured by the extent to which members of appointed boards and commissions relate within an organized framework of agencies, groups, and individuals involved in housing matters. The expansion of fair housing choice requires a team effort, and public leadership and commitment is a prerequisite to strategic action.

The mayors and city councils of Davenport, Moline and Rock Island appoint residents to serve on various boards and commissions that focus on a wide range of issues. Housing-related boards and commissions that include adequate representation of members of the protected classes enhance the decision-making process and ensure that the cities are able to understand and serve the needs of these populations. The following bodies are especially relevant to fair housing issues. To the extent that it is available, information on the gender, race, ethnicity and disability status of board and commission members is provided.

DAVENPORT

Davenport's 2010 population was 10.8% Black and 7.3% Hispanic. In addition, almost 11% of its population age 5 and older had at least one disability.

i. Davenport City Plan and Zoning Commission

The City Plan and Zoning Commission is an appointed eleven-member citizen board that is charged with making recommendations to City Council on all matters that pertain to the city's comprehensive plan. Its work includes reviewing development plans and reviewing and making recommendations on amendments to the comprehensive plan, zoning ordinance and map, subdivision plats, right-of-way vacations, and flood plain variances.

Currently, the commission is comprised of 10 men and one woman.

ii. Davenport Citizen Advisory Committee

The Citizen Advisory Committee (CAC) is a fifteen-member committee appointed to assist with the administration of the city's federal Community Development Block Grant (CDBG) program. The CAC reviews CDBG funding applications from nonprofit organizations and makes recommendations to City Council on how CDBG funds should be allocated. In addition, the CAC monitors the performance of the activities funded and considers community needs in preparation for future funding decisions.

The current CAC membership includes eight men and seven women.

iii. Davenport Housing Commission

The Housing Commission oversees the administration of several programs that provide housing assistance to lower-income persons. City-owned facilities include the Heritage House, which provides 120 units of housing for the elderly and people with disabilities, and scattered-site public housing for 42 households. In addition, the Section 8 program provides housing assistance funding for more than 500 eligible renter households living in privately owned units. Commission members oversee the administration of these properties and consider appeals of administrative actions raised by tenants.

The commission's board is appointed by the mayor and City Council. It has four members--two males and two females, all of whom are White.

iv. Davenport Civil Rights Commission

The Davenport Civil Rights Commission is governed by a seven-member board of commissioners who are appointed by the mayor and confirmed by City Council. The current board includes two Black members, two Hispanic members and one member with a disability.

v. Zoning Board of Adjustment

The Zoning Board of Adjustment is an appointed five-member citizen board that hears appeals for zoning variances and applications for other discretionary zoning permits. The board hears and reviews requests for zoning ordinance interpretations, special exceptions, special use permits, home occupation permits.

Board members are appointed by the mayor with confirmation by City Council. The board's current membership consists of three men and two women.

Based on incomplete information concerning the race, ethnicity and disability status of board and commission members, it is impossible to determine whether Davenport's various appointed boards and commissions have adequate representation from members of the protected classes.

MOLINE

Moline's 2010 population was 5.2% Black and 15.6% Hispanic, and almost 11% of its population age 5 and older had at least one disability.

i. Moline Citizen Advisory Council of Urban Policy (CACUP)

CACUP serves as a link between the citizens of Moline and city government. CACUP makes recommendations to city officials regarding local community development issues. It reviews CDBG funding applications and makes recommendations to city council regarding the distribution of CDBG funds. Committee members are appointed by the mayor with the approval of City Council. The committee's seven members include five men and two women, all of whom are White, including one Hispanic.

ii. Moline Plan Commission

The Plan Commission's purpose is to ensure that adequate provisions are made for the preparation of a comprehensive city plan for the guidance, direction and control of development and redevelopment within the city and in surrounding areas that are not included in another municipality. The commission reviews and considers subdivision and zoning matters.

The commission has 11 members – 10 men and one woman. All members are White, and none have disabilities.

iii. Moline Housing Authority

The Moline Housing Authority's Board of Directors is an appointed five-member board that establishes policy for the administration and operation of the authority. The board is comprised of two White males, one Black male, and two White females.

iv. Moline Human Rights Commission (MHRC)

The Moline Huamn Rights Commission was established by city ordinance in 2002. The commission is comprised of seven members appointed by the mayor and approved by City Council. The commission's members include six men, one woman, two Black members and one Hispanic member.

Of the 30 selected board and commission members in Moline, 27 (90%) are White, and 24 (80%) are male. There are two Black persons (7%) and two Hispanic persons (7%) among the 30 appointed positions. Based on the information provided, none of the appointments included persons with disabilities.

Moline's population is about 5% Black and 16% Hispanic, making Blacks slightly over-represented and Hispanics significantly under-represented on Moline's housing-related appointed boards and commissions. Due to incomplete information, no determination can be made regarding the relative presence of people with disabilities on these boards and commissions.

ROCK ISLAND

Rock Island's 2010 population was 18.3% Black and 9.4% Hispanic, and 13% of its population age 5 and older had at least one disability.

i. Rock Island Board of Zoning Appeals

The Board of Zoning Appeals has final city review authority for zoning variances, discretionary zoning uses and interpretations of the zoning ordinance and map. Its seven board members are appointed by the mayor with the approval of City Council. Current board membership includes five White men, one White woman and one Black woman.

ii. Rock Island Citizens' Advisory Committee

The Citizens' Advisory Committee makes recommendations to City Council on the allocation of federal Community Development Block Grant (CDBG) funds and $50,000 of gaming funds designated for social service agencies.

The committee's 11-member board is appointed by the mayor with City Council approval and includes representation of a variety of community interests. The current board has seven White men and four White women.

iii. Rock Island Planning Commission

The Planning Commission's 11 members are appointed by the mayor with City Council approval. The commission's main duties are preparing comprehensive and neighborhood plans, preparing amendments to land development ordinances (e.g., zoning and subdivision ordinances), and conducting public hearings for zoning, site plan review, and subdivision requests initiated by citizens.

Currently, the commission consists of eight men and three women, including one Black member and one Hispanic member. None of the members have disabilities.

iv. Rock Island Housing Authority

The Rock Island Housing Authority's Board of Directors is an appointed seven-member board that establishes policy for the administration and operation of the authority. The board has four White males, two Black males, and one White female. One member has a disability.

v. Rock Island Human Rights Commission (RIHRC)

The Rock Island Human Rights Commission is comprised of 12 residents who are broadly representative of the community. These commissioners are appointed by the mayor and approved by City Council. There are currently 10 commissioners, including four women, two Blacks and one Hispanic.

Of the 46 members on appointed housing-related boards and commissions in Rock Island, 38 (83%) are White, and 32 (70%) are male. There are six Black persons (13%) and two Hispanic persons (4%) among the 46 appointed positions. One person has a disability.

Rock Island's population is about 18% Black and 9% Hispanic, making both Blacks and Hispanics significantly under-represented on Rock Island's housing-related appointed boards and commissions. Due to incomplete information, no determination can be made regarding the relative presence of people with disabilities on these boards and commissions.

Minority populations are generally under-represented on the three cities' housing-related appointed boards and commissions.

> ***The experiences and perspectives of members of the protected classes on these boards and commissions would enhance local decision-making processes and provide opportunities for affirmatively furthering fair housing choices in the three cities.***

C. Accessibility of Private Residential Dwelling Units

From a regulatory standpoint, local government measures to control land use (such as zoning regulations) define the range and density of housing that can be introduced in a community. Housing quality standards are enforced through local building codes and inspections procedures. Residential accessibility standards are established by state or local codes and compliance with these standards is achieved through design plan reviews and inspection procedures.

With regard to the accessibility of residential units, the City of Davenport follows Iowa Code 104 a.1, which requires accessibility for persons with disabilities in new residential property of four or more units. Moline and Rock Island require compliance with the Illinois Accessibility Code (71 Illinois Administrative Code 400) and the Environmental Barrier Act (410 ILCS 25) to ensure accessibility of new construction and rehabilitation of multi-story residential developments of four or

more stories that contain 10 or more units. In all three cities, HUD's Fair Housing Accessibility Guidelines are applicable to any new residential construction of four or more units not otherwise covered by the applicable state laws.

For Davenport's new HOME-assisted units, HUD requires compliance with 24 CFR Part 8, which implements Section 504 of the Rehabilitation Act of 1973. Multi-family development must comply with 24 CFR 100.204, which implements the Fair Housing Act construction requirements. To address the needs of persons with mobility impairments, a minimum of 5% of all units (or at least one unit, whichever is greater) must comply with the Uniform Federal Accessibility Standards (UFAS) required under Section 504. An additional 2% of units (or at least one unit) is required to be accessible for individuals with hearing or vision impairments.

In Davenport, the Building Inspections Division of the city's public works department reviews building construction and rehabilitation plans, issuing required permits, and conducting code compliance inspections during construction.

In 2005, the Davenport Civil Rights Commission (DCRC) conducted a survey regarding the accessibility of new residential construction and found that the city was approving building designs for new construction that did not meet the Fair Housing Act accessibility standards. Subsequently, DCRC has been involved in the city's building design review process for new residential construction and checks off on building designs as being compliant with the accessibility requirements of the Fair Housing Act. DCRC also reviews building designs for public buildings and commercial facilities for compliance with the Americans with Disabilities Act.

DCRC's 2005 survey suggests that architects, contractors, property owners and others associated with new residential construction may not be aware of their regulatory obligations in regard to accommodating persons with disabilities.

Fair Housing Best Practice:

Davenport Civil Rights Commission's participation in the City of Davenport's review of construction plans for new residential development helps ensure accessible housing for people with disabilities. The Commission employs one attorney in the position of Housing Analyst who is trained to review new residential construction plans for compliance with fair housing accessibility standards.

In Moline, the city's Buildings/Inspections Department reviews plans for building construction and rehabilitation and performs inspections during new construction and rehabilitation to ensure compliance with all applicable codes.

In Rock Island, the Inspections Division of the city's Community and Economic Development Department reviews building construction and rehabilitation plans, issues permits, and is responsible for code enforcement for all new construction and rehabilitation via periodic inspections during construction.

All three cities have residential rental property inspection programs that require regular inspection of properties and annual license and/or inspection fees. The inspections conducted for these rental properties do not include any consideration of the presence, type or condition of accessibility features. Expanding the inspection checklists for these programs to include information on

accessibility features would provide the cities with a basic inventory of the number and location of accessible rental units within their jurisdictions.

Davenport, Moline and Rock Island should amend their rental property inspection checklists to include information on interior and exterior accessibility features of the properties.

D. Language Access Plan for Persons with Limited English Proficiency

To determine whether translation of vital Community Development Block Grant programs documents is required, a HUD entitlement community must first identify the number of Limited English Proficiency (LEP) persons in a single language group who are likely to qualify for and be served by the entitlement community's programs. (The term "vital document" refers generally to any publication that is needed to gain access to the benefits of a program or service.)

In Davenport, Moline and Rock Island, Census data indicates that Spanish is the one language with significant numbers (i.e., more than 1,000) of native speakers who also speak English less than "very well." (The 1,000 person criterion is a HUD "safe-harbor" threshold for entitlement communities to use when considering the need to translate documents.)

Persons with LEP are defined as persons who have a limited ability to read, write, speak or understand English. HUD uses the prevalence of persons with LEP to identify the potential for impediments to fair housing choice due to their inability to comprehend English. Persons with LEP may encounter obstacles to fair housing by virtue of language and cultural barriers within their new environment. To assist these individuals, it is important that a community recognizes their presence and the potential for discrimination, whether intentional or inadvertent, and establishes policies to eliminate barriers. Although there is no requirement to develop a Language Access Plan (LAP) for persons with LEP, HUD entitlement communities are responsible for serving LEP persons in accordance with Title VI of the Civil Rights Act of 1964. Preparation of a LAP is the most effective way to achieve compliance.

As noted earlier, Spanish is the only native language that has more than 1,000 native speakers with LEP in each of the three cities. Davenport has a formal Language Access Plan (LAP), and the city has bi-lingual staff members who are available to assist Spanish-speaking clients. Moline has conducted an informal four-factor analysis[1] and concluded that it can best serve the local Hispanic LEP population by providing bi-lingual services within its Community Development Department. The department's services include bi-lingual staff, translator services, and bi-lingual publications and news items. Rock Island has taken steps to secure certified translation capabilities to serve immigrants and refugees. In light of the recent expansion in LEP populations in the Quad City area, Moline and Rock Island should conduct a formal four-factor analysis to determine whether each city needs to prepare and adopt an LAP.

A number of social service agency stakeholders interviewed during the preparation of the AI indicated that there is a definite need for securing the services of independent, certified translators to assist the area's growing number of persons with LEP in accessing public programs and services. However, LEP advocacy organizations noted that some Spanish-speaking minorities with

[1] As required by Executive Order 13166, guidance on HUD's four-factor analysis, officially known as "Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibitions Against National Origin Discrimination Affecting Limited English Proficient (LEP) Persons," was published in the *Federal Register* dated January 22, 2007.

LEP perceive local government as being unfriendly toward them and do not trust government organizations. For example, they are not comfortable with workshops conducted by government agencies. This is an obstacle for local governments trying to meet the needs of persons with LEP.

None of the housing authorities operating in the jurisdictions of the three entitlement communities has an LAP. The Davenport Housing Commission has not conducted a four-factor analysis, but based on an informal analysis of its program participants and Davenport's population, it provides informational brochures in Spanish and Vietnamese. The Moline Housing Authority has not conducted a four-factor analysis, but it has a large number of French-speaking residents and translates flyers from time-to-time. The Rock Island Housing Authority has conducted a four-factor analysis and determined that, thus far, it is not feasible for it to translate documents into other languages. As needed, the authority uses translators that it is able to access through partnerships with various organizations.

In light of growing LEP populations and the need for certified translators and translated documents expressed by many social service and advocacy groups, the cities of Moline and Rock Island, and the Davenport Housing Commission and Moline Housing Authority, should individually conduct the four-factor analysis to determine whether each needs to prepare and adopt a LAP.

E. Comprehensive Planning

A community's comprehensive plan is a statement of policies relative to new development and preservation of existing assets. In particular, the land use element of the comprehensive plan defines the location, type and character of future development. The housing element of the comprehensive plan expresses the preferred density and intensity of residential neighborhoods. Taken together, the land use and housing elements of the comprehensive plan define a vision of the type of community that each jurisdiction wishes to become.

The Comprehensive Plans for the city of Davenport, the city of Moline and the city of Rock Island were reviewed for the AI. The review was based primarily on the following topics, to evaluate the impact of the plans on the local fair housing landscape:

- Overall housing needs and goals,
- Designated growth areas,
- Linkage between housing and employment,
- Acknowledgement of obligation to affirmatively further fair housing, and
- Strategies to meet the housing needs of all households, regardless of race, ethnicity, income or familial status.

i. Davenport

Davenport 2025, the City's evaluation of current conditions and its vision for future development, was adopted by City Council in 2005 following a two-year process that involved extensive citizen participation. During this process, the community identified 144 policies, programs and projects for pursuit during the following two decades. The document consolidates these ideas into nine goals and 41 objectives.

With specific regard to housing, the Plan evaluates both strengths and needs in the city's market. Patterns of housing development in Davenport have been generally classified as having occurred in three phases, characterized by rings of census tracts in the general order of their annexation and expansion farther from the river. The majority of housing developed since 1970 has consisted of single-family detached homes, most of which are in the city's third-phase area of development. While the total number of housing units has doubled in the third tier since 1970, the number of units in the first-tier core development area has declined by one-quarter. As of the 2000 Census, single-family housing comprised 68% of all housing in Davenport, compared to 72% in 1970. The city's larger multi-family rental complexes are concentrated primarily downtown and along Kimberly Road.

The Plan characterizes Davenport's housing stock as "generally affordable," consisting of a variety of structure types and price ranges. However, there is acknowledgement that a full third of households in the city spend at least half of their adjusted gross income on housing, qualifying them as severely cost burdened. The city's public and assisted housing programs exist to address the mismatch between incomes and housing costs.

For the long term, the plan calls for improvement to the quality of housing in the city, reinvestment in existing built environment, and for special efforts to influence the market through incentives and rehabilitation programs, ensuring that the city's housing stock can meet the community's physical, economic and social needs. Infill is identified as an important need, as many of more than 150 abandoned properties are within the city's core development area. Davenport 2025 suggests the removal of obstacles to the development of built-out inner areas where services and facilities are already in place.

The Plan promotes the adoption of an urban service area boundary that delineates where infrastructure and services will likely be available during the next 20 years. For 2025, the boundary captures approximately 52 square miles, of which nine square miles were undeveloped in 2005. The boundary offers guidance toward the timing of development, infrastructure and transportation, discouraging sprawl.

The Plan suggests that annexation be pursued when the "urban service area" eclipses the city limits. The Plan anticipates that about 80% of the city's 64 miles will be developed by 2025, an increase of five square miles from the year 2005.

The Plan's goals, as they relate to fair housing, include:

- promoting adaptive reuse and infill
- increasing the number of mixed-use neighborhoods
- developing land-use policies that permit the development of a wide variety of building types, uses and densities
- improving housing options and multi-modal transporation linkages downtown
- developing a communitywide multi-modal transportation plan, and
- strengthening educational and recreational opportunities.

Though Davenport's comprehensive plan acknowledges an affordability mismatch, it does not go further to address the possibility of disparate need across racial/ethnic groups or special needs populations. Davenport 2025 could be improved by the adoption of a statement of the city's intention to affirmatively further fair housing and the addition of housing policies that consider the aims of desegregation and advancing the availability of access to opportunity.

ii. Moline

Moline's Comprehensive Plan, adopted in November 2001, includes 10 chapters written to guide future development through goals and objectives based on the analysis of existing conditions and the identification of conditions that could come into play. At the time of the Plan's writing, the city of Moline had "a high level of momentum," owing to its first decennial population gain since reaching a peak number of residents in 1970, successful redevelopment efforts downtown and new developments along John Deere Road. The Comprehensive Plan was intended to capture that momentum and promote reasons to invest in Moline.

According to a survey of land uses conducted in 2000, 39% of land within the city consisted of single-family detached home lots, while an additional 3.1% of land was devoted to multi-family residential uses, including duplexes, townhomes, condominiums, apartment buildings and retirement villages. While the number of acres covered by residential properties increased by 1,850, or 72% from 2,538 acres in 1963, single-family acreage grew at a greater rate than multi-family acreage. In 1963, 293 acres were classified as multi-family uses, compared to 325 in 2000. By contrast, 2,299 acres in 1963 were single-family, compared to 4,063 in 2000. Other major categories of land use included streets, which covered 21.8% of all city land in 2000, vacant property, which covered 14.1%, and commercial and mixed use, which covered 8.2%.

Notably, the proliferation of land used for single-family detached housing occurred despite only a slight population increase between 1960 (42,705) and 2000 (43,768). The Plan explains that accommodating essentially the same amount of people required much more land in 2000 due to larger lots in newer subdivisions, smaller families, more one-person households and an aging population.

The Plan notes limitations to future development, such as challenges posed by the 100-year flood plains of the Mississippi and Rock rivers, local wetlands, the presence of inactive coal mines, steep ravines and slopes, and soil characteristics along creeks. Additionally, the area is rich in sites of archaeological significance, such as camps and burial mounds.

In the Plan, the city identified major, centralized service facilities that represent focal points for development in Moline. These traffic generators, attractive resources and primary points of activity include (among others) Downtown as the city's historic commercial center, Olde Town and Uptown as neighborhood retail centers, the Avenue of the Cities as a major two-mile transportation business corridor, SouthPark Mall as a retail center, Quad City International Airport and the John Deere Road Corridor, which includes a wide variety of office and retail uses.

The category of Housing and Neighborhood Stabilization qualified as one of four "critical issues" described in the Comprehensive Plan. Citing data that showed lower-than-average owner occupancy and an increase in low-cost housing, the city observed that the young and elderly were staying, while middle-aged families were leaving due to a lack of housing stock in "the price range that appeals to this population segment." The city cited a higher-than-average per-capita income in demonstrating that Moline's workforce is strong and

capable of investing in housing stock. To address the problem of retaining middle-aged families, the Plan suggests adopting concepts that promote neighborhood well being, preserve lifestyle and improve the appearance of older neighborhoods; increase code enforcement; and consider increasing standards for landscaping and property maintenance. Additionally, the Plan noted "a market trend toward high-density residential," particularly in areas within walking distance of downtown, and suggested that the market for "high-end" rentals in Moline could be built upon.

The Plan's goals and objectives related to housing primarily relate to neighborhood preservation/beautification, ramping up code enforcement and maintenance standards, promoting rehabilitation opportunities for all ages and income groups, responding to market demand for multi-family housing above stores downtown and nearby, building upon market demand for high-end rentals, pursuing the development of new subdivisions that will provide units in the range of $150,000 to $200,000, developing quality infill standards and working with other local governments to annex enclaves of unincorporated area within the city.

The Comprehensive Plan does not identify a need to create additional affordable housing, nor does it address the housing needs of any particular population group beyond the suggestion that middle-aged families looking for mid-priced ownership opportunities are underserved. From a fair housing perspective, the Plan could be improved by the adoption of an overarching statement regarding the City's responsibility to affirmatively further fair housing and a set of housing policies that advance that aim. Housing needs particular to lower-income populations and households with special needs are monitored as a part of the Consolidated Planning process, which could factor into the development of the next edition of the Comprehensive Plan. Further, future development patterns should reflect consideration of the connection between housing and various facets of opportunity, such as access to transit, employment, health care and schools.

The Comprehensive Plans for both Moline and Davenport lack housing and land-use strategies that would expand the opportunities available to members of the protected classes.

Both plans could be strengthened by the addition of an overarching statement of intention to affirmatively further fair housing and policy goals and objectives that would serve this intention. While the needs of lower-income and special needs households are addressed in the Consolidated Planning process for entitlement funds, the aim of providing equal housing opportunity should also factor into the cities' overall housing and land-use goals.

iii. Rock Island

In lieu of communitywide comprehensive planning, the City of Rock Island has maintained a tradition of more localized planning since the 1960s. Separate community plans currently include the Andalusia Road Corridor Study, the Columbia Park Plan, the RiverVision Plan and the Downtown Strategic Plan, as well as plans for a lock and dam lighting project, bikeways and parkways. Neighborhood plans focus individually on Broadway, Chicago, Douglas Park, KeyStone and Longview, envisioning investments in the form of new commercial, residential, recreational and other development and redevelopment. With the exception of the Chicago plan, the neighborhood plans were completed in the mid-1990s.

A commitment to expanding fair housing opportunities must involve a strategy that reflects a wide-scope view of a community, considering its areas of racial and ethnic minority and poverty concentration within the context of opportunity – to what extent does the distribution of housing allow residents equal access to meaningful work, quality schools, medical

facilities and other amenities? In the absence of a communitywide consolidated plan to examine the relationship between housing, land use, transportation and other features, the City should consider drafting and adopting a stand-alone fair housing policy or diversity statement.

Rock Island's neighborhood-specific planning focus leaves a gap concerning issues best addressed at a communitywide level, such as fair housing.

Neighborhood plans can be used to implement citywide fair housing goals and objectives. In the absence of a comprehensive plan, Rock Island should consider the adoption of a stand-alone fair housing policy or diversity statement that could establish such goals.

The planning policy documents of the three cities should strive to define the location of jobs held by lower wage employees and analyze the location of affordable housing within the context of public transit routes. The stated goal should be to expand the supply of decent affordable housing that is within proximity to entry-level/lower-skill jobs.

F. Zoning Policies and Regulations

In both Illinois and Iowa, the power behind land development decisions resides with local governments through the formulation and administration of local controls. These include comprehensive plans, zoning ordinances and subdivision ordinances, as well as building and development permits. Land use controls have a direct and substantial effect on the location of housing opportunities affordable and accessible to members of the protected classes. In addition to discrimination that expressly intends to limit or prevent the development of affordable or accessible housing, even policies that appear neutral may have the potential for disparate impact on vulnerable populations.

For this analysis, zoning ordinances for the city of Davenport, the city of Moline and the city of Rock Island were reviewed. Summaries of the zoning ordinances reviewed to identify regulations that may impede fair housing choice are included in Appendix B.

The analysis of zoning regulations was based on the following five topics raised in HUD's Fair Housing Planning Guide, which include:

- The opportunity to develop various housing types (including apartments and housing at various densities),
- The opportunity to develop alternative designs (such as cluster developments, planned residential developments, inclusionary zoning, and transit-oriented developments),
- Minimum lot size requirements (lot sizes that are too large can discourage affordable housing development),
- Dispersal requirements and regulatory provisions for housing facilities for persons with disabilities (e.g. group homes) in single-family zoning districts, and

- The definition of family and restrictions on the number of unrelated persons in dwelling units.

In addition, the review considered the amount of land zoned and available for multi-family housing. Other provisions related to housing that were reviewed to determine compliance with state and federal statutes include where mobile homes, modular housing, and prefabricated housing are permitted, where mobile home parks are permitted, and regulations concerning accessory dwelling units.

i. Regional Coordination

In 1995, the cities of Moline and Rock Island collaborated with the City of East Moline and Rock Island County to develop and adopt a Unified Zoning Ordinance. In an effort to standardize their local ordinances to the greatest extent possible, the cities adopted a set of shared land use definitions. However, as this review verified, substantial differences in procedures and administration remain. Moline's ordinance, for instance, contains fewer and broader land uses than were established in the regional code. Overall, the regional code has introduced some common ground to the regulation of specific land uses, in terms of the districts in which they are permitted by right, permitted conditionally or prohibited.

ii. Date of Ordinance

Generally speaking, the older a zoning ordinance, the less effective it will be. Older zoning ordinances have not evolved to address changing land uses, lifestyles and demographics. However, the age of the zoning ordinance does not necessarily mean that the regulations impede housing choice by members of the protected classes.

Davenport's ordinance was by far the oldest among the three reviewed, originally adopted in 1960. Moline's ordinance was adopted in 2006, and Rock Island's was adopted in 2002. All three have been amended incrementally to reflect updates or changes to specific sections. No outdated or potentially offensive terminology was noted in any of the three ordinances.

iii. Residential Zoning Districts and Permitted Dwelling Types

The number of residential zoning districts is not as significant as the characteristics of each district, including permitted land uses, minimum lot sizes, and the range of permitted housing types. However, the number of residential zoning districts is indicative of the municipality's desire to promote and provide a diverse housing stock for different types of households at a wide range of income levels.

Similar to excessively large lots, restrictive forms of land use that exclude any particular form of housing, particularly multi-family housing, discourage the development of affordable housing. Allowing varied residential types reduces potential impediments to housing choice by members of the protected classes. The significant elements reviewed for the AI were the location, size and availability of developable land in zoning districts where multi-family dwellings and group homes are permitted.

The City of Moline has established four residential zones. The city's R-2 district, which spans the vast majority of residentially zoned space, allows single-family detached homes at the relatively low density of six units per gross acre. However, "twin houses" and zero-lot line developments are permitted by right in particularly designated infill areas of R-2, and townhouses and multiplexes are conditionally permitted as well in those areas. The R-4 district, scattered more sparsely across the city, provides areas for medium-density development (up to 14 dwelling units/acre) of single-family detached and attached homes, duplexes, townhomes and garden apartments. The city's R-6 district is its most urban in

character (more than 14 dwelling units per acre) and allows a wide range of unit types, including multi-level apartment buildings. According to the 2010 zoning map, this zoning category appears to be fitted only to a handful of existing high-density developments, which would indicate that the supply of land available and zoned for larger apartment buildings is limited. Finally, a separate category carves out space where mobile homes and mobile home parks may be located. This R-7 district is concentrated in one area near the Rock River.

Moline's zoning code allows some residential uses in districts other than the strictly residential districts noted above; however, in such cases, some residential unit types may require a special use permit depending on size, intensity, etc. Thus, residential development is permitted throughout the city with the exception of industrial zoning districts.

Davenport's zoning ordinance contains a more extensive set of categories, including eight residential districts as well as a handful of others where some dwelling uses are permitted. The R-1 and R-2 districts, reserved for single-family detached housing at low densities, exist primarily at the outskirts of the city's residential areas, with a large swath of R-1 bordering land zoned for agriculture and R-2 along the city's eastern side. The R-3 and R-4 districts additionally allow for duplexes, but only on certain lots. The R-4 district covers the majority of residentially zoned land in the city. Areas zoned as R-5, which allow duplexes without restriction, are much smaller and appear to be site-specific. Multi-family housing is allowed in the R-5M (walkup apartments, garden apartments, group/row houses) and R-6M districts (also high-rise apartments). The amount of land designated as R-5M or R-6M is minimal and scattered. Davenport has also established a separate land use category for mobile home parks, R-7. Three sizable blocks of land on the western side of the City are dedicated to this purpose.

Rock Island's ordinance establishes seven residential zoning districts and four agricultural or suburban areas where some residential uses are permitted. The suburban categories, which allow single-family detached homes at the very low densities of one unit per acre and one unit per five acres, do not appear on the city's latest zoning map. The two agricultural districts referred to in the ordinance text also do not appear on the zoning map. These classifications were included in the ordinance to allow the City to zone accordingly to address future needs, particularly regarding property that is not now in the City, but could be annexed. The largest portion of Rock Island's residential area is classified as R-2, allowing only single-family detached homes by right. Duplexes are additionally allowed in R-3, which also covers a substantial land area. The R-4 district, located mostly north of 18th Avenue, adds boarding/lodging facilities. The city's multi-family districts, R-5 and R-6, are much more limited and scattered. Similar to the other cities, Rock Island maintains a separate category for mobile homes and manufactured housing, which must locate in specific areas near and south of the Rock River.

The zoning categories established by each city provide for a wide variety of housing types. However, the amount of land zoned and available for multi-family housing appears to be minimal.

While the percentage of land zoned for multi-family uses that is vacant and available for development is undetermined, a review of zoning maps for each city indicates that apartments are permitted to be located in only a small fraction of areas. A lack of land vacant and available for the development of this housing type could limit more

affordable housing options for members of the protected classes, who are disproportionately represented among the cities' renter populations.

iv. Permitted Residential Lot Sizes

Because members of the protected classes are often also in low-income households, a lack of affordable housing may impede housing choice by members of the protected classes. Excessively large lot sizes may deter development of affordable housing. A balance should be struck between areas with larger lots and those with smaller lots that will more easily support creation of affordable housing. Finally, the cost of land is an important factor in assessing affordable housing opportunities. Although small lot sizes of 10,000 square feet or less may be permitted, if the cost to acquire such a lot is prohibitively expensive, then new affordable housing opportunities may be severely limited, if not non-existent.

While lot sizes are prohibitively large in the agriculturally oriented and resource conservation zones of each city, in no case are these areas large enough to threaten the availability of alternative land uses and smaller lot sizes, which all three cities offer in abundance. In Moline, the largest minimum lot size for new construction is 5,000 to 6,000 square feet. This minimum exists in R-2, while lots in R-6 and R-7 may be as small as 1,250 square feet. Non-conforming lots are subject to exceptions to setback requirements to make them buildable, and staff members additionally have the authority to approve further variance up to 10%. Davenport maintains lot minimums of an imposing 10,000-20,000 square feet in its low-density R-1 and R-2 districts, but these areas comprise a reasonably small portion of the City's total land area. In Davenport's other residential districts, minimum lot sizes range from 8,500 square feet down to 1,000 square feet per dwelling unit in R-6M, the high-density dwelling district. In Rock Island, minimums in residential districts range from 7,500 square feet to "not applicable" in multi-family districts.

v. Alternative Design

Allowing alternative designs provides opportunities for affordable housing by reducing the cost of infrastructure spread out over a larger parcel of land. Alternative designs may also increase the economies of scale in site development, further supporting the development of lower-cost housing. Alternative designs can promote other community development objectives, including agricultural preservation or protection of environmentally sensitive lands, while off-setting large-lot zoning and supporting the development of varied residential types. However, in many communities, alternative design developments often include higher-priced homes. Consideration should be given to alternative design developments that seek to produce and preserve affordable housing options for working and lower-income households.

Some alternative design is evident in the three ordinances reviewed:

- To provide for the efficient use of large, vacant parcels in its R-2 district, Moline has established a set of standards by which more compact and dense infill development can occur by right.
- Moline accommodates persons with disabilities by administratively approving accessibility ramps that would otherwise violate set-back requirements and by allowing designated handicap parking spaces in front of homes where spaces otherwise would not be permitted on a public street.

- Moline provides administrative approvals for granting variances up to 10% for residential development on non-conforming lots.
- Davenport regulates the conversion of all multi-family units to condominiums or co-ops with the understanding that such conversions "have the potential to affect the supply of rental housing within the city and to displace households residing in the rental units to be converted."
- Davenport allows for Traditional Neighborhood Development, which encourages mixed-use, compact development with an integration of land uses, at infill sites in largely developed areas of the city.
- In order to expand the range of structure types where appropriate, Davenport established an Attached Dwelling Overlay that allows for attached dwellings in certain areas where they would otherwise not be a permitted use. For example, the overlay would allow a four-plex in R-3, a district primarily devoted to single-family detached homes.
- Rock Island amended its zoning ordinance to permit rebuild infill activities on original building footprints, which has stimulated rebuilding and reinvestment in older neighborhoods with affordable housing stock. Additionally, the city issues rebuild letters to appraisers and banks to certify that in-fill building can occur on non-conforming lots. Previously, banks were denying mortgages because lots were non-conforming and underwriters were fearful that the ordinance would not permit rebuilding on original building footprints.
- Planned Unit Development districts, of which each city has at least one category, are established for the purpose of constructing homes in a cluster arrangement on smaller lots with larger common areas of green space available. The concept of including an affordable housing set-aside within this arrangement is not common. Consequently, PUDs generally tend to include very low density, non-affordable homes. There are exceptions, such as in Rock Island, where the PUD classification can be applied to any property greater than 60,000 square feet and provides substantial flexibility, allowing mixed-use projects, higher density, compact development and other accommodations that would encourage affordable housing types. City staff members offered the example of a residential development rezoned to PUD to allow for a combination of rental or for-sale condominiums designed for small families, empty nesters or starter units.
- One additional potential consideration for future implementation is transit-oriented development strategies, which promote compact, mixed-use development in the vicinity of transit access and high-quality pedestrian environments. Opportunities currently exist, particularly in Davenport, where the integration of affordable housing and access to transit options would expand choice for lower-income households. Stakeholders interviewed during the development of the AI suggested that group home and multi-family developments across the three cities are often placed in locations where there is no public transit and where providing such service would be economically infeasible. These locations sometimes have physical features (steep slopes, cul-de-sacs, etc) that make bus service impossible.

vi. Definition of Family

Restrictive definitions of family may impede unrelated individuals from sharing a dwelling unit. Defining family broadly advances non-traditional families and supports the blending of families who may be living together for economic purposes. Restrictions in the definition of

family typically cap the number of unrelated individuals that can live together. These restrictions can impede the development of group homes, effectively impeding housing choice for the disabled. However, in the absence of an occupancy ordinance, caps on unrelated individuals residing together may be warranted to avoid overcrowding that may create health and safety concerns.

All three cities limit the number of unrelated individuals who may live together. In Moline and Rock Island, this limit is three, while Davenport allows for up to five unrelated persons to share a home. While this cap can restrict housing choice for non-traditional families, the regulations do make exceptions for group homes for persons with disabilities by classifying them as a separate type of use.

Rock Island provides for an administrative exception for up to five unrelated individuals to live together, but requires that certain conditions be met, including a 300-foot buffer between houses with more than three unrelated individuals. According to interviews, this policy exists to restrict Augustana College students from overcrowding housing in neighborhoods immediately surrounding the college. However, these restrictions would also restrict choice for small group homes for persons with disabilities that wish to locate in single-family districts.

Each city's cap on the number of unrelated individuals who may live together as a family limits non-traditional housing arrangements, many of which exist for economic reasons.

A more ideal definition, from a fair housing perspective, would not distinguish between unrelated and related persons, but would focus on the manner in which persons live together as a cohesive household. The exception to this would be college students sharing a dwelling unit.

vii. Regulations for Group Homes for Persons with Disabilities

Group homes are residential uses that do not adversely impact a community. Efforts should be made to ensure group homes can be easily accommodated throughout the community under the same standards as any other residential use. Of particular concern are those that serve members of the protected classes such as persons with disabilities. Because a group home for people with disabilities serves to provide a non-institutional experience for its occupants, imposing conditions are contrary to the purpose of a group home. More importantly, the restrictions, unless executed against all residential uses in the zoning district, are an impediment to the siting of group homes in violation of the Fair Housing Act.

Two primary purposes of a group home residence are normalization and community integration. By allowing group residences throughout the community in agreement with the same standards as applied to all other residential uses occupied by a family, the purposes of the use are not hindered and housing choice for people with disabilities is not impeded. Toward this end, municipalities may not impose distancing requirements on group homes for persons with disabilities.

Interviews conducted with staff members in all three cities indicated that group homes are being approved by planning commissions, even despite "not-in-my-backyard" opposition from residents.

Moline classifies group homes as a "group residential" use, divided into two types: small, including facilities for up to eight persons, and large, for more than eight. As defined, "group residential" includes retirement homes, convents and dormitories as well as community-based residential facilities, such as those serving persons with disabilities. Group homes may be developed in a variety of residential districts (R-4, R-6, R-7, agriculture, conservation, conditionally in R-2). However, no group home in Moline, small or large, may be located within 2,500 feet of any other group home, regardless of its capacity. Additionally, applicants proposing new group homes must demonstrate that the total capacity of all community living arrangements of all capacities in the city shall not exceed 1% of the total population, unless a special use permit is granted following a public hearing. These requirements directly limit fair housing choice for persons with disabilities, and they are therefore inconsistent with the Fair Housing Act.

With specific regard to group residential uses, Moline's ordinance specifies that the Planning Commission is authorized to waive or vary provisions of the zoning code when necessary to reasonably accommodate the rights of persons with disabilities, "to ensure the full exercise and enjoyment of a disabled person's right to the residential housing of his or her choosing." However, the process still requires an applicant proposing a group home for persons with disabilities to file a request for a special use requiring a reasonable accommodation, and for that reason the system as it is arranged presents barriers to the development of housing options for persons with disabilities. By carving out "group homes for persons with disabilities" as an entirely separate use and ensuring that they are treated as single-family homes, able to exist by right in any residential district, the city could remove these barriers.

Moline's zoning ordinance requires applicants proposing group homes for persons with disabilities to request a reasonable accommodation to avoid the mandated buffer requirement and needs assessment required of other use types in the "group residential" category.

By defining "group homes for persons with disabilities" as a separate category, the city could remove this barrier. Fair housing standards call for group homes serving persons with disabilities to be treated as other single-family homes and permitted by right in all single family residential zoning districts.

In Davenport, group homes of up to five may exist as single-family households, while those including six or more unrelated persons are classified as an institutional use. The institutional category also includes colleges, hospitals and transitional housing for the homeless, among other uses. According to the ordinance, institutions are allowed by right beginning with the R-5M (medium-density) dwelling district through the C-4 Central Business district. Institutional uses may locate in other districts with special use permits.

The city has realized the limitations of grouping disparate uses together in the institutional category. In January 2012, planning staff imposed a six-month moratorium on the establishment of all new and expanded "homeless housing uses that meet the

definition of an institution," not to include uses that fall under the definition of "family" (five or fewer unrelated persons). The purpose of the moratorium is to allow staff to research and draft new regulations without the pressure of consideration of specific proposals.

In drafting its new regulations, the city should consider and incorporate the fair housing principles explained above, chief among which is the right of group homes for persons with disabilities to exist in any residential neighborhood absent additional restrictions or requirements that would not apply to other homes in those areas. Ideally, group homes for up to eight persons should be permitted to locate in all single-family districts.

Davenport's revision of the zoning ordinance as it relates to "institutional" housing uses should incorporate fair housing principles for group homes for persons with disabilities.

Removing restrictions on this housing type is important to ensuring that affordable, accessible and non-institutional housing opportunities are available to disabled persons.

Rock Island's "care home" category, divided between small facilities (serving up to eight persons) and large facilities (serving more than eight persons), encompasses the group home use defined in the AI. Small care homes are permitted by right in all residential districts. Large care homes are permitted upon approval by the Board of Zoning Appeals in R-4 and must be at least 1,000 feet from an existing similar use. In the restrictions for the College/University District, the city specifies that small care homes must be at least 1,000 feet from any other community residence, must be locally or state licensed and must have a certificate of occupancy from the Building Official. These restrictions are not specified for the care home use in any other zone.

G. Public Housing

Three public housing authorities serve lower-income households in the cities of Davenport, Moline, and Rock Island: the Davenport Housing Commission (DHC), the Moline Housing Authority (MHA), and the Rock Island Housing Authority (RIHA). Each of these authorities provides housing in a different manner. DHC has scattered-site public housing, Section 8 Housing Choice Vouchers and a project-based development for the elderly and persons with disabilities, while MHA and RIHA both have traditional public housing communities and Section 8 Housing Choice Voucher programs.

The following information was developed from stakeholder interviews, responses to the AI questionnaires completed by the three public housing authorities (PHA), and the analysis of several policy documents provided by the PHAs.

i. Davenport Housing Commission Public Housing

DHC's housing inventory consists of 42 units in 21 public housing sites scattered across the City and 120 units for seniors and people with disabilities in a Section 8 project-based development called The Heritage located downtown.

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 requires that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, a Public Housing Authority's (PHA) administrative offices, application offices and other non-residential facilities must be accessible to persons with disabilities.

The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible. Federal regulations at 24 CFR 8.26 and HUD Public and Indian Housing (PIH) Notice 2002-1 describe the obligation of PHAs to provide UFAS-accessible units at each project site and in a sufficient range of bedroom sizes. The intent of requiring the distribution of UFAS-accessible units in a variety of bedroom sizes and in a variety of locations is to ensure that people with disabilities have choices of living arrangements comparable to those of other families eligible for assistance under public housing programs.

Currently, 20 of DHC's project-based units at The Heritage are UFAS units, and it is using Capital Funds to make two of its scattered-site public housing units UFAS units.

Information collected during the development of the AI indicated that DHC recently completed its Section 504 Needs Assessment to determine whether its units and facilities are adequately accessible to persons with mobility and sensory disabilities. DHC has entirely renovated the 20 accessible units at The Heritage to UFAS standards. This includes reconstructing bathrooms and minor modifications to closets to permit easier access. The 5% mobility requirement was met through the renovations, and the 2% sensory requirement will be met as new residents request modifications to their units on a case-by-case basis. In addition, DHC is using Capital Funds to make two of its scattered site units UFAS compliant. Staff does not currently track how many Section 8 Housing Choice Voucher units are UFAS compliant, but will begin tracking. Staff believes that there are currently two Section 8 units UFAS compliant.

The Davenport Housing Commission should complete its Section 504 Needs Assessment and Transition Plan and promptly take required remedial actions.

Figure 4-1 contains information provided by DHC on its current public housing residents and applicants. One consequence of the scarcity of affordable housing for members of the protected classes is their reliance on assisted housing to meet their housing needs. The relative presence of members of the protected classes as current and prospective public housing and Section 8 tenants is evidence of this situation. According to DHC staff, a majority of the public housing tenants are occupied by minority female-headed households with children.

In 2010, 11% of Davenport's population was Black. In February 2012, Black households comprised 84% of DHC's public housing tenants and 53% of its public housing waiting list. Blacks are thus very much overrepresented in Davenport's current and prospective public housing tenants.

By contrast, although 7% of Davenport's population in 2010 was Hispanic, in February 2012, none of DHC's public housing tenants was Hispanic, but 5% of the households on DHC's public housing waiting list were Hispanic. This underrepresentation of Hispanics in Davenport's public housing supports anecdotal information provided by stakeholders

interviewed during the AI process. These interviewees stated that Hispanics want to live in houses, not apartments.

Davenport's public housing program provides 42 units of housing for families requiring two or more bedrooms, i.e., families with children. Due to Davenport's inadequate supply of affordable housing for families with children, such families must rely on public housing to meet their needs.

Census data indicates that, in 2010, 11% of Davenport's population that was age 5 or older had at least one disability. In February 2012, 7% of DHC's public housing households were families that had at least one member with a disability. At the same time, 9% of DHC's public housing waiting list households were such families. Thus families that had at least one member with a disability were slightly underrepresented as both current and prospective public housing tenants.

In February 2012, 1,505 families were on the waiting list for DHC public housing. There is a four year waiting list for the scattered-site units.

Figure 4-1
DHC Public Housing Residents and Applicants, 2012

	Current Residents		Waiting List Applicants	
Total households	**43**	**100.0%**	**1,505**	**100.0%**
Income level				
Extremely low income (30% or less of AMI)	34	79.1%	1,337	88.8%
Very low income (30.1% to 50% of AMI)	9	20.9%	161	10.7%
Low income (50.1% to 80% of AMI)	0	0.0%	7	0.5%
Household type*				
Families with children	39	90.7%	1,493	99.2%
Elderly	1	2.3%	10	0.7%
Member with a disability	3	7.0%	132	8.8%
Race and ethnicity				
Black	36	83.7%	799	53.1%
White	7	16.3%	556	36.9%
Asian	0	0.0%	8	0.5%
Other race	0	0.0%	142	9.4%
Hispanic**	NA	0.0%	80	5.3%
Characteristics by bedroom size				
1 Bedroom	0	0.0%	0	0.0%
2 Bedroom	14	32.6%	941	62.5%
3 Bedroom	25	58.1%	479	31.8%
4 Bedroom	4	9.3%	85	5.6%
5+ Bedroom	0	0.0%	0	0.0%

* Categories are not mutually exclusive.

** Hispanics are counted as an Ethnic group, not a Race.

Source: Davenport Housing Commission, 2012

During the preparation of the AI, an interview with DHC staff revealed that Davenport City Council occasionally considers selling the city-owned 42 units of scattered-site public housing. These units provide affordable housing for minority female-headed families with

children, a protected class under fair housing laws. The four-year waiting list for these units testifies to the scarcity of this type of housing for this group. It is critical that these units remain available as public housing for the city to fulfill its role in affirmatively furthering fair housing choice. Davenport Housing Commission should retain its city-owned 42 units of scattered-site public housing to provide affordable housing for minority female-headed households with children as an example of the city's commitment to affirmatively further fair housing choice for protected classes.

The Admission and Continued Occupancy Plan (ACOP) includes a PHA's policies on the selection and admission of applicants from a waiting list, screening of applicants for tenancy, occupancy standards and policies, informal review/grievance hearing procedures, rent determinations, procedural guidelines on conducting inspections, and other matters. DHC's ACOP was reviewed from a fair housing perspective to ensure that members of the protected classes are afforded adequate housing choices. Specifically, the ACOP was reviewed to determine the presence of the following policies and whether these policies were in compliance with the Fair Housing Act:

- Fair housing and equal opportunity non-discrimination clause that provides a list of the protected classes within a PHA's jurisdiction,
- Reasonable accommodation policies for persons with disabilities (relative to the application process, unit selection, and grievance procedures),
- Accommodations for persons with limited English proficiency (LEP) and a list of services a PHA is willing to provide such persons,
- Definition of "family" and whether or not it includes non-traditional households with unrelated individuals,
- Tenant selection policies and waiting list preferences to determine whether members of the protected classes are given any special consideration or if the local preferences restrict their housing choice,
- Accommodations for applicants who refuse a unit offered due to a disability or other special circumstance,
- Transfer policies and procedures and whether such policies impede housing choice for members of the protected classes,
- Pet policy accommodations for persons with disabilities who require service or assistance animals, and
- Grievance policies and procedures.

The Davenport ACOP does not contain a fair housing policy in which DHC states its anti-discrimination policy. The list of protected classes should include race, color, religion, sex, national origin, age, familial status, disability, creed, marital status, sexual orientation and gender identity.

DHC's policy relative to reasonable accommodations is not clearly outlined, but Section III. A. under "Occupancy Standards" sets forth guidelines for a live-in aide to care for a family member who is disabled. DHC also provides a list of properties available for rent and the level of accessible features. DHC's written documents, e.g., intake application, reexamination documents, and notices of adverse action by DHC, do not include inquiries as to whether applicants and tenants require any type of accommodations.

DHC's policy relative to applicants with limited English proficiency (LEP) is not stated. DHC does provide brochures in Spanish and Vietnamese, in addition to language services, but no services are clearly stated as a matter of policy.

DHC's ACOP does not provide a clear definition of "family." Under Section III, A. "Occupancy Standards," a determination of the unit size for which a family qualifies is outlined, but no definition of family is provided.

Section II of DHC's ACOP provides the agency's tenant selection policies and waiting list preferences. Under Section F, families on the waiting list who have indicated that they require a handicap accessible unit will be contacted when such a unit is available. These families take precedence over families not requiring a handicap accessible unit. Section H, "Admissions Preferences" part d. provides for the transfer of families already living in public housing taking precedence over emergencies, the "overhoused", and the "underhoused" if there is a medical justification, such as the need for a handicap accessible unit.

No clear accommodation is outlined for applicants who refuse a unit offered due to a disability or other special circumstances.

No pet policy is outlined that provides accommodation for persons with disabilities who require service or assistance animals.

Section IX of the ACOP provides grievance procedures. The procedures provide for due process in cases of tenant complaints or grievances. A grievance or complaint can be filed due to any dispute with respect to a City action or inaction in accordance with lease requirements or interpretation of the City's regulations, policies, or procedures that affects the rights, duties, welfare, or status of the complainant. Any grievance or complaint must be presented, in writing, to DHC within ten calendar days of the action grieved. A hearing is then scheduled and a written notification provided concerning the time and place of the hearing.

The Davenport Housing Commission must amend its ACOP to meet all HUD requirements relative to fair housing laws.

ii. DHC Section 8 Housing Choice Voucher Program

In addition to administering the public housing program, the Davenport Housing Commission also administers the Section 8 Housing Choice Voucher program for the city.

In June 2011 (the most recent data available), there were 595 Section 8 Housing Choice Voucher Holder households, and an additional 3,721 families on the waiting list. There is a seven-year waiting list for vouchers.

DHC provided data on its current voucher holders, as described in the following table. Over 60% of its voucher holder households are Black, much higher than the 10.2% overall share of Black households in Davenport. In addition, 55% of prospective voucher holders were Black households.

Information on Hispanic Section 8 tenants in June 2011 was not available, but in February 2012, Hispanics made up 4% of the DHC Section 8 waiting list households. In contrast, Hispanic households were 4.2% of City households overall.

Another protected class overrepresented in DHC's Section 8 housing is families with children. Families with children compose 47% of Davenport's total family households, but they are 64% of its current Section 8 tenants and represent 65% of its Section 8 waiting list.

Census data indicates that, in 2010, 11% of Davenport's population age 5 or older had at least one disability. In February 2012, 23% of DHC's Section 8 tenants were families with

at least one member who had a disability. At the same time, 24% of DHC's Section 8 waiting list families were in this category. Thus families with members with disabilities were overrepresented as current and prospective Section 8 tenants.

Income data was limited for voucher holders, but information on unit size indicates that one-, two- and three-bedroom units are most commonly in demand. Families with children represent 65% of the households on the waiting list, the largest share by household type.

Figure 4-2
DHC Section 8 Voucher Holders, 2011

	Current Voucher Holders		Waiting List Applicants	
Total households	**595**	**100.0%**	**3,721**	**100.0%**
Income level				
Extremely low income (30% or less of AMI)	469	78.8%	3,250	87.3%
Very low income (30.1% to 50% of AMI)	116	19.5%	462	12.4%
Low income (50.1% to 80% of AMI)	10	1.7%	9	0.2%
Household type*				
Families with children	380	63.9%	2,406	64.7%
Elderly	79	13.3%	196	5.3%
Member with a disability	136	22.9%	898	24.1%
Race and ethnicity				
Black	365	61.3%	2,050	55.1%
White	207	34.8%	1,364	36.7%
Asian	6	1.0%	15	0.4%
Other race	3	0.5%	292	7.8%
Characteristics by bedroom size				
1 Bedroom	2	0.3%	1,228	33.0%
2 Bedroom	116	19.5%	1,509	40.6%
3 Bedroom	240	40.3%	787	21.2%
4 Bedroom	217	36.5%	163	4.4%
5+ Bedroom	2	0.3%	29	0.8%

* Categories are not mutually exclusive.

Source: Davenport Housing Commission, 2012

Black households and families with children are disproportionately represented among Davenport's current and prospective public housing and Section 8 tenants, and families with disabilities are disproportionately represented among current and prospective Section 8 tenants, indicating a disproportionate need of these groups for affordable housing.

DHC's four year waiting list for public housing and seven year waiting list for Section 8 vouchers underscore the need for affordable housing.

According to recent interviews with DHC, the Commission has 520 vouchers under lease, but 575 are authorized. Currently, the Commission's payment standard is 100% of fair market rent (FMR). DHC has had few problems getting landlords to participate in the Section 8 program, but DHC's most recent data indicates that 28% of new vouchers

holders were unable to secure units in the private market housing due mainly to poor credit and/or rental history, inability to afford the security deposit or obtain a utility account, or unreasonable expectations concerning appropriate units (e.g., higher cost unit).

The high percentage of Section 8 voucher holders who cannot secure private market housing due to inadequate financial resources underscores the need for additional efforts to increase employment opportunities for low-income residents.

The Housing Choice Voucher Administrative Plan (Administrative Plan) is the policy and procedure manual that includes the regulations governing this housing assistance program. Generally, the Administrative Plan includes policies that describe the selection and admission of applicants from the PHA Section 8 waiting list, the issuance and denial of vouchers, occupancy policies, landlord participation, subsidy standards, informal review/hearing procedures, payment standards, the Housing Quality Standard (HQS) inspection process, and reasonable rents. DHC's Administrative Plan was reviewed from a fair housing perspective to ensure that members of the protected classes are afforded adequate housing choices. Specifically, the Plan was reviewed to determine the presence of the following policies and whether these policies were in compliance with the Fair Housing Act:

- Fair housing and equal opportunity non-discrimination clause that provides a list of the protected classes within a PHA's jurisdiction,
- Reasonable accommodation policies for persons with disabilities (in the application process, unit search and selection, and grievance process),
- Accommodations for persons with limited English proficiency (LEP) and a list of services a PHA is willing to provide such persons,
- Definition of "family" and whether or not it includes non-traditional households with unrelated individuals,
- Tenant selection policies and waiting list preferences to determine whether members of the protected classes are given any special consideration or if the local preferences restrict their housing choice,
- Recruitment of landlords who own properties in non-impacted areas,
- Portability policies and procedures and their effect on members of the protected classes,
- Higher payment standards for units that accommodate persons with disabilities, and
- Grievance policies and procedures.

The Administrative Plan does not contain a fair housing policy in which DHC states its anti-discrimination policy. The list of protected classes should include race, color, religion, sex, national origin, age, familial status, disability, marital status, sexual orientation and gender identity. Section VII, Illegal Discrimination: Assistance to Families, does state that if a family claims that illegal discrimination has prevented them from leasing a suitable unit under the program, the PHA will provide the family with a copy of HUD's brochure, "Fair Housing; It's Your Right" and a copy of form HUD-903, Housing Discrimination Complaint.

DHC's policy relative to reasonable accommodations is not clearly outlined, but Section XII. A. under "Subsidy Standards" sets forth guidelines for a live-in aide to care for a family

member who is disabled. DHC also provides a list of properties available for rent and the level of accessible features.

DHC's policy relative to those applicants with limited English proficiency (LEP) is not stated for Housing Choice Voucher holders.

In order to be eligible to receive a Section 8 Housing Choice Voucher, the applicant must be a "family." In Section XI, "Occupancy Policies of the Administrative Plan", DHC defines "family" in the following manner: a family with a child or children, a group of persons consisting of two or more adults, at least one of whom is elderly or disabled, a single person, or a child who is temporarily away from home because of placement in foster care is considered a member of the family.

The Administrative Plan does not contain tenant selection policies and waiting list preferences.

DHC outlines a process to encourage participation by private property owners in Section VIII. This is in "order to encourage participation by owners of suitable units that are located outside areas of low income or minority concentration." These procedures include the following: publish and disseminate information about the program to interested owners, maintain a rental book in which owners may list units available for rent, and provide program information to local landlord associations.

During an interview with DHC, the issue of voucher portability was addressed. For the most part, there is a balance between vouchers ported into and out of Davenport. Vouchers are distributed uniformly throughout the city. Approximately six Section 8 HCV holders currently occupy units outside of the city.

No higher payment standards for units that accommodate persons with disabilities is outlined in the Administrative Plan. The Plan does state in Section IV, Establishing Payment Standards for the Voucher Program, that payment standards for each unit will be established at 100% of the published Fair Market Rent (FMR) for that unit size. No payment standard is specified to accommodate persons with disabilities.

Section XVIII of the Administrative Plan covers Complaints and Appeals. The procedures provide for due process in cases of complaints. DHC investigates and responds to complaints by program participants and applicants denied vouchers. Complaints other than those regarding housing quality standards must be submitted in writing. When DHC denies assistance to an applicant for the voucher program, it provides written notice containing the reasons. The notice states that the applicant may request in writing an informal review within 10 calendar days of the denial and describes how to obtain the review. The review is conducted by a DHC-designated person who was not involved in the original decision. The applicant is given the opportunity to present written or oral objections to DHC's decision. Following the informal hearing, DHC will notify the applicant of its decision, including its reasoning. A similar procedure is in place for grievances by current voucher holders. Neither set of procedures provides a statement that reasonable accommodations will be made for persons with disabilities.

The Davenport Housing Commission must amend its Section 8 Housing Choice Voucher Administrative Plan to meet all HUD requirements relative to fair housing laws.

iii. MHA Public Housing

The Moline Housing Authority (MHA) operates 486 public housing units and administers 234 Section 8 Housing Choice Vouchers. The public housing units are located in three

community development sites: Spring Valley, 182 units (elderly, persons with disabilities and single persons), Hillside, 120 units (elderly, persons with disabilities and single persons), and Spring Brook, 184 units (family). The waiting list is currently open for both public housing and Section 8 units.

Two of Moline's three public housing sites are in Impacted Areas. (See Map 4-6.)

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 requires that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, a Public Housing Authority's (PHA) administrative offices, application offices and other non-residential facilities must be accessible to persons with disabilities.

The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible. Federal regulations at 24 CFR 8.26 and HUD Public and Indian Housing (PIH) Notice 2002-1 describe the obligation of PHAs to provide UFAS-accessible units at each project site and in a sufficient range of bedroom sizes. The intent of requiring the distribution of UFAS-accessible units in a variety of bedroom sizes and in a variety of locations is to ensure that people with disabilities have choices of living arrangements comparable to those of other families eligible for assistance under public housing programs.

A current Section 504 Plan was not available for review.

Figure 4-3 contains information provided by MHA on its current residents and applicants for public housing. In Moline in 2010, 5% of the city's population was Black. In February 2012, Black households comprised 42% of the MHA's public housing tenants and 53% of its public housing waiting list. Blacks were thus substantially overrepresented among Moline's current and prospective public housing tenants.

Although 16% of Moline's population in 2010 was Hispanic, in February 2012, just 5% of its public housing tenants and 4% of its prospective public housing tenants were Hispanic, making Hispanics very much underrepresented in both categories. (This data was provided separately from the data provided in the following table.)

Families with children are 42% of Moline's total family households. In February 2012, families with children made up 23% of current MHA public housing tenants and 28% of MHA's public housing waiting list, significant underrepresentations.

Census data indicates that, in 2010, 11% of Moline's population age 5 and older had at least one disability. For current MHA public housing tenants, families with at least one member with a disability represented 30% of public housing tenants – an overrepresentation – and 9% of the families on the public housing waiting list – a slight underrepresentation.

Figure 4-3
MHA Public Housing Residents and Applicants, 2012

	Current Residents		Waiting List Applicants	
Total households	**482**	**100.0%**	**197**	**100.0%**
Income level				
Extremely low income (30% or less of AMI)	297	61.6%	122	61.9%
Very low income (30.1% to 50% of AMI)	68	14.1%	54	27.4%
Low income (50.1% to 80% of AMI)	88	18.3%	21	10.7%
Household type*				
Families with children	111	23.0%	57	28.9%
Elderly	61	12.7%	2	1.0%
Member with a disability	146	30.3%	19	9.6%
Race and ethnicity				
Black	204	42.3%	106	53.8%
White	276	57.3%	77	39.1%
Asian	3	0.6%	3	1.5%
Other race	2	0.0%	1	0.5%
Characteristics by bedroom size				
1 Bedroom	147	30.5%	67	34.0%
2 Bedroom	87	18.0%	35	17.8%
3 Bedroom	30	6.2%	23	11.7%
4 Bedroom	11	2.3%	1	0.5%
5+ Bedroom	0	0.0%	0	0.0%

* Categories are not mutually exclusive.
Note: Totals do not match due to inavailability of some data for some applicants or residents.
Source: Moline Housing Authority, 2012

MHA's ACOP was not made available for review.

iv. MHA Section 8 Housing Choice Voucher Program

In addition to administering the public housing program, MHA administers the Section 8 Housing Choice Voucher program in Moline.

MHA manages 234 tenant-based vouchers through its rental subsidy programs with private landlords. Currently, there are 211 vouchers in use. One hundred Section 8 units are apartments; the remaining 134 units are rental houses.

In 2010, 5% of the City's population was Black. In February 2012, Black households represented 44% of MHA's Section 8 tenants, and 67% of its Section 8 waiting list. Black households are thus very much overrepresented in Moline's Section 8 housing.

Data on Hispanics indicated that, although 9% of Moline's population in 2010 was Hispanic, in February 2012, just 5% of its Section 8 tenants was Hispanic, i.e., an underrepresentation. No data was provided on Hispanics on the Section 8 waiting list.

In terms of families with children, 42% of Moline's total family households in 2010 were families with children. In February 2012, 56% of MHA's Section 8 tenants were families with children, making this protected class overrepresented in Section 8 housing. Families with children were 59% of prospective Section 8 tenants, another overrepresentation.

In 2010, 11% of Moline's population age 5 or older had at least one disability. In February 2012, 3% of its Section 8 tenants were families with at least one member with a disability – a significant underrepresentation. Further, just one such family (0.4%) was on MHA's Section 8 waiting list– a substantial underrepresentation.

MHA provided data on its current voucher holders and waiting list applicants, as described in the table below.

Figure 4-4
MHA Section 8 Voucher Holders, 2012

	Current Voucher Holders		Waiting List Applicants	
Total households	**210**	**100.0%**	**287**	**100.0%**
Income level				
Extremely low income (30% or less of AMI)	157	74.8%	NA	NA
Very low income (30.1% to 50% of AMI)	48	22.9%	NA	NA
Low income (50.1% to 80% of AMI)	5	2.4%	NA	NA
Household type*				
Families with children	117	55.7%	170	NA
Elderly	35	16.7%	5	NA
Member with a disability	74	35.2%	1	NA
Race and ethnicity				
Black	92	43.8%	191	66.6%
White	117	55.7%	81	28.2%
Asian	0	0.0%	0	0.0%
Other race	1	0.5%	15	5.2%
Characteristics by bedroom size				
0 Bedroom	2	1.0%	NA	NA
1 Bedroom	46	21.9%	NA	NA
2 Bedroom	80	38.1%	NA	NA
3 Bedroom	69	32.9%	NA	NA
4 Bedroom	11	5.2%	NA	NA

* Categories are not mutually exclusive.
Source: Moline Housing Authority, 2012

MHA indicated that 90%of all new voucher holders return their vouchers to MHA after 60 days due to their inability to secure private rental housing. This percentage drops to 70% after 120 days of searching for suitable units. MHA's Section 8 Housing Choice Voucher Administrative Plan was not made available for review.

The large number of MHA new voucher holders who return their vouchers due to inability to find suitable units in the private market underscores the need to increase the supply of such units and the need to solicit more landlords to participate in the Section 8 program.

Black households are disproportionately represented among MHA's current and prospective public housing and Section 8 tenants, and families with children are disproportionately represented among current and prospective Section 8 tenants, indicating a disproportionate need for affordable housing among these protected classes.

v. RHA Public Housing

The Rock Island Housing Authority's (RIHA) public housing inventory consists of 487 public housing units. In addition, there are two Low Income Housing Tax Credit (LIHTC) projects. Douglas Park Place is an 8-unit, rental development for women who are recovering from intense substance abuse. There is a six-month maximum stay for these units. Cascade Gardens is a 70-unit facility for the general public that provides a preference for households that include one person with a disability. Figure 4-5 provides an overview on RIHA units. Three of Rock Island's four public housing sites are located in Impacted Areas. (See Map 4-7.)

Section 504 of the Rehabilitation Act of 1973 and 24 CFR Part 8 requires that 5% of all public housing units be accessible to persons with mobility impairments. Another 2% of public housing units must be accessible to persons with sensory impairments. In addition, a Public Housing Authority's (PHA) administrative offices, application offices and other non-residential facilities must be accessible to persons with disabilities.

The Uniform Federal Accessibility Standards (UFAS) is the standard against which residential and non-residential spaces are judged to be accessible. Federal regulations at 24 CFR 8.26 and HUD Public and Indian Housing (PIH) Notice 2002-1 describe the obligation of PHAs to provide UFAS-accessible units at each project site and in a sufficient range of bedroom sizes. The intent of requiring the distribution of UFAS-accessible units in a variety of bedroom sizes and in a variety of locations is to ensure that people with disabilities have choices of living arrangements comparable to those of other families eligible for assistance under public housing programs.

Figure 4-5
Characteristics of RIHA Developments, 2012

Name	Units	Type
Spencer Towers	199	Elderly and Disabled
Sunset Heights	141	Adults
Lincoln Homes	45	Family
Manor Homes	102	Family
Total	**487**	

Source: Rock Island Housing Authority, 2012

RIHA's Section 504 Plan was updated in 2009 and used to complete modifications in 2011 with American Recovery and Reinvestment Act (ARRA) funds. RIHA received a national award from the National Association of Housing and Redevelopment Officials (NAHRO) for its Spencer Towers 504 Relocation Assistance Program. This effort successfully relocated residents through a detailed implementation plan.

The following table contains information provided from RIHA on its current residents and applicants for public housing. There is an approximate three-year wait for those on RIHA's public housing waiting list.

In 2010, 18% of Rock Island's population was Black. In February 2012, Black households represented 51% RIHA's public housing tenants and 54% of its public housing waiting list. Black households are very much overrepresented among Rock Island's current and prospective public housing tenants.

Although 9% of Rock Island's population in 2010 was Hispanic, in February 2012, just 4% of its public housing tenants were Hispanic. Also in February 2012, Hispanics made up 5% of RIHA's public housing waiting list. Therefore, in Rock Island, Hispanics were underrepresented among RIHA's current and prospective public housing tenants.

In terms of families with children, 46% of Rock Island's total family households in 2010 were families with children. In February 2012, 27% of RIHA's public housing tenants and 61% of its prospective tenants were families with children, making this protected class underrepresented among current public housing tenants, but were overrepresented as prospective public housing tenants.

In 2010, 13% of Rock Island's population age 5 or older had at least one disability. In February 2012, 34% of RIHA's public housing tenants were families that had at least one member who had a disability – a substantial overrepresentation for this group. By contrast, just 6% of its public housing waiting list families had a member with a disability – a significant underrepresentation.

Figure 4-6
RIHA Public Housing Residents and Applicants, 2012

	Current Residents		Waiting List Applicants	
Total households	**475**	**100.0%**	**544**	**100.0%**
Household type*				
Families with children	129	27.2%	331	60.8%
Elderly	66	13.9%	9	1.7%
Families with disabilities	161	33.9%	35	6.4%
Race and ethnicity				
Black	242	50.9%	295	54.2%
White	176	37.1%	215	39.5%
Asian	57	12.0%	31	5.7%
Other race	0	0.0%	3	0.6%
Hispanic**	18	3.8%	26	4.8%
Characteristics by bedroom size				
1 Bedroom	318	66.9%	173	31.8%
2 Bedroom	105	22.1%	191	35.1%
3 Bedroom	42	8.8%	155	28.5%
4 Bedroom	10	2.1%	25	4.6%
5+ Bedroom	0	0.0%	0	0.0%

* Categories are not mutually exclusive.

** Hispanics are counted as an Ethnic group, not a Race.

Source: Rock Island Housing Authority, 2012

RIHA's ACOP was reviewed to determine the presence of the following policies and whether these policies were in compliance with the Fair Housing Act:

- Fair housing and equal opportunity non-discrimination clause that provides a list of the protected classes within a PHA's jurisdiction,
- Reasonable accommodation policies for persons with disabilities (relative to the application process, unit selection, and grievance procedures),
- Accommodations for persons with limited English proficiency (LEP) and a list of services a PHA is willing to provide such persons,

- Definition of "family" and whether or not it includes non-traditional households with unrelated individuals,
- Tenant selection policies and waiting list preferences to determine whether members of the protected classes are given any special consideration or if the local preferences restrict their housing choice,
- Accommodations for applicants who refuse a unit offered due to a disability or other special circumstance,
- Transfer policies and procedures and whether such policies impede housing choice for members of the protected classes,
- Pet policy accommodations for persons with disabilities who require service or assistance animals, and
- Grievance policies and procedures.

RIHA's ACOP clearly prohibits discrimination in housing. The list of protected classes includes race, color, religion, sex, national origin, age, familial status, disability, marital status, sexual orientation and gender identity.

RIHA's policy relative to reasonable accommodations is clearly outlined. Part II, Section 2-II.B. provides a definition of reasonable accommodation. RIHA distributes forms for the request of accommodations with each application and also includes related information with notifications to tenants of re-examination or notices of adverse action by RIHA. All decisions granting or denying requests are made in writing. In order to receive a reasonable accommodation, a person must have a "physical or mental impairment that substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such impairment." The requested accommodation must be related to the disability and be considered reasonable, as in not causing an undue financial and administrative burden or representing a fundamental alteration in the nature of RIHA's program.

RIHA's policy relative to those applicants with limited English proficiency (LEP) is stated in Chapter 2, Part III. This section provides guidance on improving access to services for persons with LEP. This chapter also lists the services RIHA is willing to provide, including oral interpretation and written translation services.

RIHA's ACOP provides a clear definition of family, including non-traditional households with unrelated individuals.

The ACOP provides the agency's tenant selection policies and waiting list preferences. Preferences are given in the following order: victims of domestic violence, families that have been involuntarily displaced, veterans of the United States Armed Forces, and working families.

There are accommodations outlined for applicants who refuse a unit offered due to a disability or other special circumstances in Section 5-II.D of the ACOP. Policies are clearly outlined for the approval/denial of a requested accommodation in Section 2-II.E.

The document outlines policies for persons with disabilities and pets (Chapter 10). The pet policy provides accommodation for persons with disabilities who require service or assistance animals. The guidelines include having the pet on a leash when it is outside of the unit and cleaning up after the pet.

Grievance policies and procedures for persons with discrimination complaints and those with disabilities are outlined in the ACOP. Applicants or tenant families who believe that

they have been discriminated against by RIHA must notify the agency either orally or in writing. RIHA is required to provide a copy of a discrimination complaint form to the complainant and provide them with information on how to complete and submit the form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).

vi. RIHA Section 8 Housing Choice Voucher Program

In addition to administering the public housing program, RIHA administers the Housing Choice Voucher program in Rock Island.

RIHA manages 313 vouchers through its rental subsidy program with private landlords, with roughly 225-230 vouchers currently being utilized. While the Section 8 waiting list is currently closed, the agency maintains a list of applicants which represents approximately 357 families (February 7, 2012). RIHA also has 25 units of Family Unification Vouchers and Shelter Plus Care vouchers.

In 2010, 18% of Rock Island's population was Black. In February 2012, Black households represented 59% of RIHA's Section 8 tenants and 73% of its Section 8 waiting list. Blacks are very much overrepresented among RIHA's current and prospective Section 8 housing tenants.

Although 9% of Rock Island's population in 2010 was Hispanic, in February 2012, just 8% of its Section 8 tenants were Hispanic. Also in February 2012, Hispanics made up 3% of RIHA's Section 8 waiting list. Therefore, Hispanics were proportionately represented among RIHA's current Section 8 tenants and significantly underrepresented as current Section 8 tenants.

In terms of families with children, 46% of Rock Island's total family households in 2010 were families with children. In February 2012, 62% of RIHA's Section 8 tenants were families with children, making this protected class overrepresented in Section 8 housing. At the same time, families with children constituted 67% of RIHA's prospective Section 8 tenants, an even greater overrepresentation.

In 2010, 13% of Rock Island's population age 5 or older had at least one disability. In February 2012, 24% of RIHA's Section 8 tenants were families with at least one member with a disability – an overrepresentation. By contrast, just 6% of RIHA's Section 8 waiting list consisted of this type of family–a significant underrepresentation.

RIHA provided additional data on its current voucher holders as indicated in the following figure. Information on unit size indicates that two- and three-bedroom units are most commonly in demand. Families with children represent 62.4% of the list, the largest share by household type. There is an approximate three-year wait for those on RIHA's Section 8 waiting list.

Figure 4-7
RIHA Section 8 Voucher Holders, 2012

	Current Voucher Holders		Waiting List Applicants	
Total households	**234**	**100.0%**	**357**	**100.0%**
Household type*				
Families with children	146	62.4%	238	66.7%
Elderly	23	9.8%	4	1.1%
Families with disabilities	56	23.9%	23	6.4%
Race and ethnicity				
Black	139	59.4%	261	73.1%
White	94	40.2%	95	26.6%
Asian	0	0.0%	0	0.0%
Other race	1	0.0%	1	0.3%
Hispanic**	18	7.7%	10	2.8%
Characteristics by bedroom size				
1 Bedroom	44	18.8%	106	29.7%
2 Bedroom	84	35.9%	141	39.5%
3 Bedroom	75	32.1%	91	25.5%
4 Bedroom	27	11.5%	17	4.8%
5+ Bedroom	4	1.7%	2	0.6%

* Categories are not mutually exclusive.

** Hispanics are counted as an Ethnic group, not a Race.

Source: Rock Island Housing Authority, 2012

According to interviews with RIHA staff, there needs to be more outreach to landlords to get additional Section 8 participating landlords. For the fourth consecutive year, HUD has given RIHA a Section 8 Management Assessment Program (SEMAP) rating of High Performer.

Black households are disproportionately represented among Rock Island's current and prospective public housing and Section 8 tenants, and families with children are disproportionately represented among current and prospective Section 8 tenants, indicating a disproportionate need of these groups for affordable housing among these protected classes.

RIHA's three-year waiting list for public housing and five-year waiting list for Section 8 vouchers underscores the need for decent affordable housing in Rock Island.

The Housing Choice Voucher Administrative Plan (Administrative Plan) is the policy and procedure manual that includes the regulations governing the Section 8 program. Generally, the Administrative Plan includes policies that describe the selection and admission of applicants from the PHA Section 8 waiting list, the issuance and denial of vouchers, occupancy policies, landlord participation, subsidy standards, informal review/hearing procedures, payment standards, the Housing Quality Standard (HQS)

inspection process, and reasonable rents. RIHA's Administrative Plan was reviewed from a fair housing perspective to ensure that members of the protected classes are afforded adequate housing choices. Specifically, the Plan was reviewed to determine the presence of the following policies and whether these policies were in compliance with the Fair Housing Act:

- Fair housing and equal opportunity non-discrimination clause that provides a list of the protected classes within a PHA's jurisdiction,
- Reasonable accommodation policies for persons with disabilities (in the application process, unit search and selection, and grievance process),
- Accommodations for persons with limited English proficiency (LEP) and a list of services a PHA is willing to provide such persons,
- Definition of "family" and whether or not it includes non-traditional households with unrelated individuals,
- Tenant selection policies and waiting list preferences to determine whether members of the protected classes are given any special consideration or if the local preferences restrict their housing choice,
- Recruitment of landlords who own properties in non-impacted areas,
- Portability policies and procedures and their effect on members of the protected classes,
- Higher payment standards for units that accommodate persons with disabilities, and
- Grievance policies and procedures.

The Administrative Plan contains a fair housing policy in which RIHA states its anti-discrimination policy. The list of protected classes includes race, color, religion, sex, national origin, age, familial status, disability, marital status. sexual orientation and gender identity.

RIHA's policy relative to reasonable accommodation for persons with disabilities is clearly outlined. Part II. A. under "Policies Related to Persons with Disabilities" sets forth guidelines for reasonable accommodation, including a definition of reasonable accommodation and the process to request accommodation. RIHA provides Section 8 landlords with copies of the ADA regulations explaining tenant/landlord rights and responsibilities.

RIHA's policy relative to those applicants with limited English proficiency (LEP) is clearly stated for Housing Choice Voucher holders in Part III. This section, similar to the ACOP, provides guidance on improving access to services for persons with LEP. This chapter also lists the services RIHA is willing to provide, including oral interpretation and written translation services.

In order to be eligible to receive a Section 8 Housing Choice Voucher, the applicant must be a family. The document does provide a clear definition of "family," including non-traditional households with unrelated individuals.

The Administrative Plan, similar to the ACOP, provides the agency's tenant selection policies and waiting list preferences. Preferences are given in the following order: victims of domestic violence, families that have been involuntarily displaced, and working families. Unlike the ACOP, no preference for veterans of the United States Armed Forces is indicated.

RIHA outlines a process to encourage participation by landlords in Chapter 13. This is in "order to encourage participation by owners of suitable units that are located outside areas

of low income or minority concentration." These procedures include the following: publish and disseminate information about the program to interested owners, maintain a rental book in which landlords may list units available for rent, and provide program information to local landlord associations. During the interviews for the AI, it was noted that more outreach to landlords was needed to obtain additional Section 8 participating landlords. RIHA has in the past removed landlords from the Section 8 program for improper treatment of tenants.

RIHA outlines a process for portability in Chapter 10, Part II. The chapter provides an overview on the process that must be followed by applicant families, including determining income eligibility.

RIHA provides higher payment standards (either within the acceptable range or with HUD approval) if RIHA determines this is necessary to enable a person with disabilities to obtain a suitable housing unit.

Chapter 16 of the Administrative Plan covers program administration, including grievance policies and procedures. The procedures provide for due process in cases of complaints, often initially under an informal hearing process. When RIHA denies assistance to an applicant for the voucher program, it provides written notice containing the reasons. The notice states that the applicant may request in writing an informal review within 10 calendar days of the denial and describes how to obtain the review. In turn, RIHA must respond within 10 days. The review is conducted by a RIHA-designated person who was not involved in the original decision. The applicant is given the opportunity to present written or oral objections to RIHA's decision. Following the informal hearing, RIHA will notify the applicant of its decision, including its reason for denial. A similar procedure is in place for grievances by current voucher holders.

H. Other Assisted Housing

Along with public housing units and Housing Choice Vouchers, assisted rental housing in Davenport, Moline, and Rockport includes private units of affordable housing developed with public assistance, through such programs as HUD Section 202 (supportive housing for low-income elderly persons), Section 811 (supportive housing for persons with disabilities), Low-Income Housing Tax Credits or other sources.

i. Davenport

The city of Davenport's 2010-2015 Consolidated Plan includes an inventory of such units. This data, combined with data from HUD's 2008 inventory of other assisted housing units, is summarized in the following table.

Figure 4-8
Other Assisted Housing Inventory, Davenport, 2012

Site	Units	Type
Lend-A-Hand	100	Seniors (Section 8)
Spring Village	120	Seniors (Tax Credit)
Luther Tow er	50	Seniors
Brookside Apartments	76	Seniors (Tax Credit)
St. Katharine Apartments	38	Seniors (Tax Credit)
Marycrest Senior Campus	80	Seniors (Tax Credit)
Meadow crest	48	Seniors (Tax Credit)
Brady Village	44	Family Housing (Section 8)
Castlew ood	96	Family Housing (Section 8)
Westview Terrace	56	Family Housing
Horizon Homes (Fairmount Pines)	110	Family Housing (Section 8)
Emeis Park	67	Family Housing (Section 8)
EHDG	25	Family Housing (Tax Credit)
Cobblestone Place	28	Family Housing (Tax Credit)
Sieg Iron Lofts	37	Family/Disabled Housing (Tax Credit)
Davenport Lofts	49	Family Housing (Tax Credit)
Courtland Apartments	36	Tax Credit
Cobblestone Terrace	10	Family Housing (Tax Credit)
Courtyards I, II, III	144	Tax Credit
Jersey Ridge Apartments	100	Tax Credit
Luther Crest	77	Seniors
HDC Group Homes	15	Special Needs
Vera French Commons	10	Special Needs
Vera French Terrace	10	Special Needs
Cross Creek	192	Tax Credit
Total	**1,618**	

Source: 2008 HUD: A Picture of Subsidized Housing; 2010-2015 City of Davenport Consolidated Plan

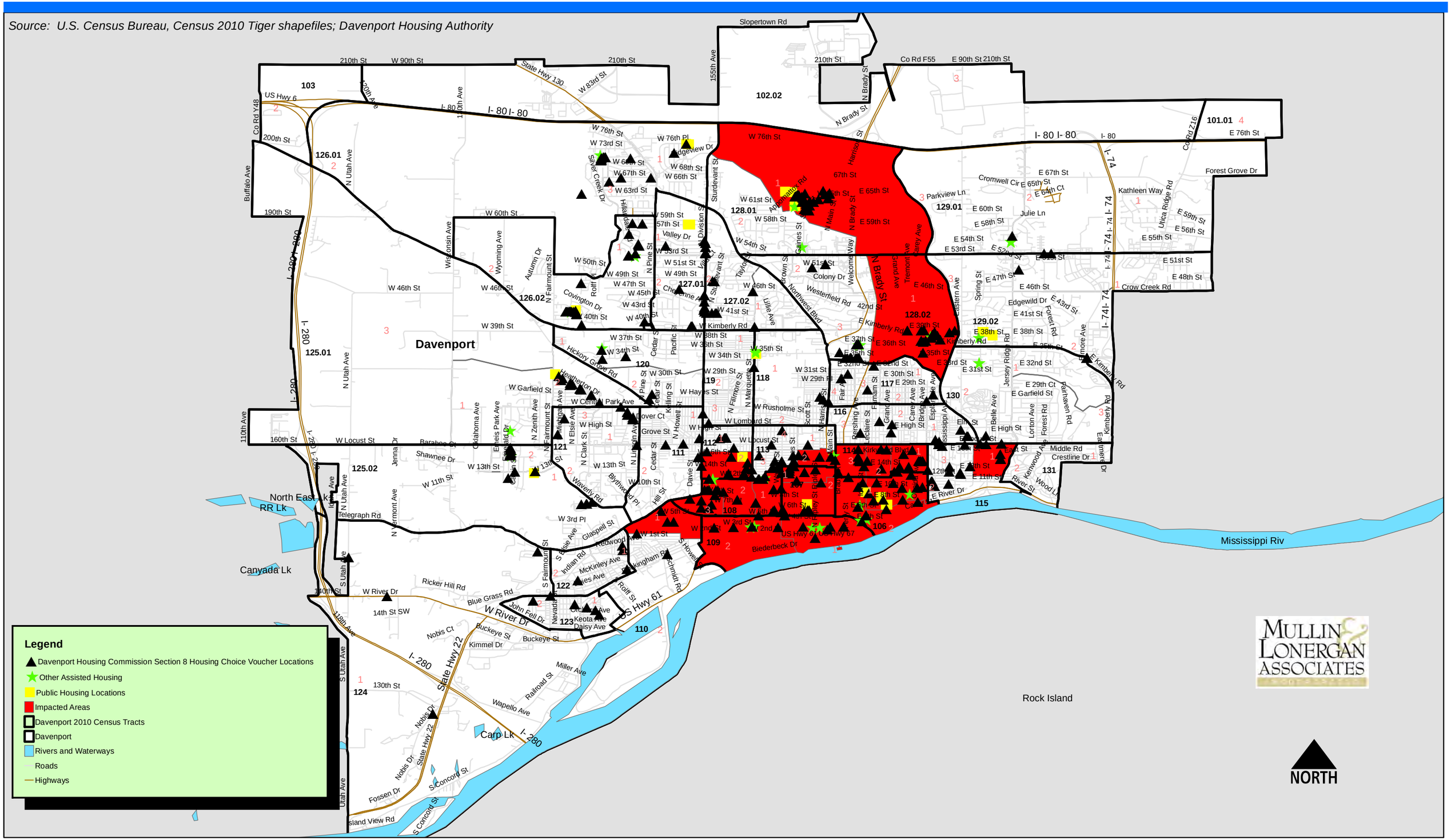
In total, there were 1,618 units of privately owned assisted housing in Davenport in 2012, about half of which were designated as elderly developments. The other half consisted of units designated for families or special needs populations. These developments are generally scattered across Davenport, with some in impacted areas and others outside of impacted areas.

Maps 4-5 shows the location of public housing units, Section 8 units and other assisted housing in Davenport.

Map 4-5: Davenport Public Housing, Section 8, and Other Assisted Housing Locations: City of Davenport, Iowa

Analysis of Impediments to Fair Housing Choice, 2012

Source: U.S. Census Bureau, Census 2010 Tiger shapefiles; Davenport Housing Authority



ii. Moline

The city of Moline's 2010-2014 Consolidated Plan has an inventory of assisted units. This data, combined with data from HUD's 2008 inventory of other assisted housing units, is summarized in the following table.

Figure 4-9
Other Assisted Housing Inventory, Moline, 2008

Site	Units	Type
Westwood Terrace	97	Section 8 (Seniors/disabled)
Sanders Apartments	40	Section 8 (Family)
Highland Manor	78	Section 8 (Family)
Moline High School Lofts	54	Tax Credit
Fiesta Manor	6	Section 8 (Family)
LeClair Apartments	110	Tax Credit
PedCor/Valley View Apartments	192	Tax Credit
Pheasant Ridge Apartments	216	Tax Credit
Moline Enterprise Lofts	69	Tax Credit
Total	**862**	

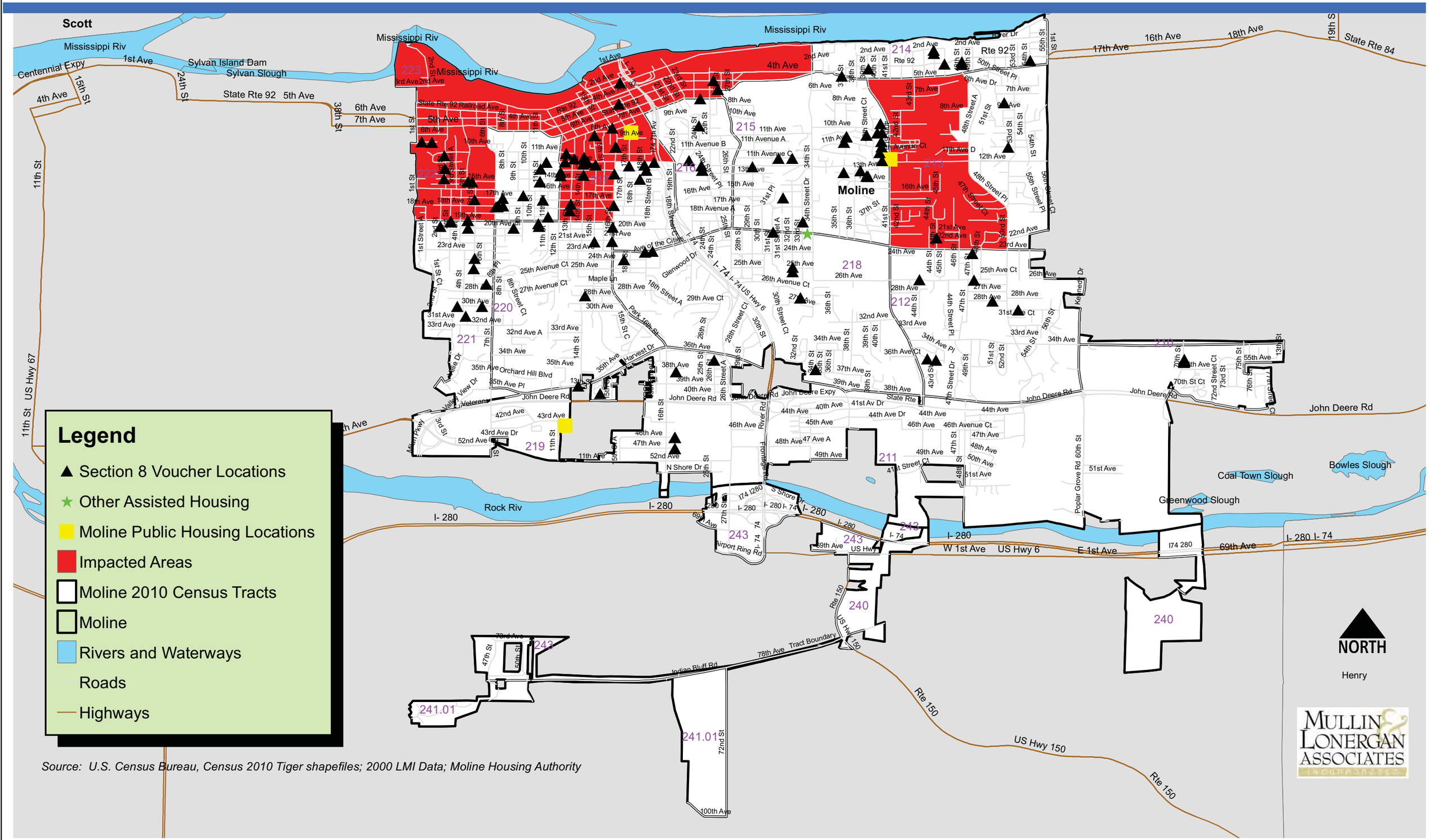
Source: 2008 HUD: A Picture of Subsidized Housing; 2010-2014 City of Moline Consolidated Plan

In total, there were 862 units of privately owned assisted housing in Moline in 2012. Developments are generally scattered across the city, located both in impacted areas and outside impacted areas.

Map 4-6 shows the location of public housing units, Section 8 units and other assisted housing in Moline.

Map 4-6: Moline Public Housing, Section 8, and Other Assisted Housing Locations: City of Moline, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



iii. Rock Island

The city of Rock Island's 2008-2013 Consolidated Plan includes an inventory of privately owned assisted units. This data, combined with data from HUD's 2008 inventory of other assisted housing units, is summarized in the following table.

Figure 4-10
Other Assisted Housing Inventory, Rock Island, 2008

Site	Units	Type
Cotton Mill Living Center	31	Elderly (Tax Credit)
Watch Hill Tower	140	Section 8
Maple Ridge Apartments	160	Section 8
Heather Ridge Apartments	171	Section 8 (Family)
Sala Flats	25	Tax Credit
Old Chicago Family Housing	11	Tax Credit
Coventry Apartments	147	Elderly (Section 8)
Century Apartments	230	Family (Section 8)
Goldman Apartments	19	Tax Credit
Voss Brothers Lofts	26	Tax Credit
Renassiance Lofts	16	Tax Credit
Jackson Square	20	NSP and Other Public Subsidies
Total	**996**	

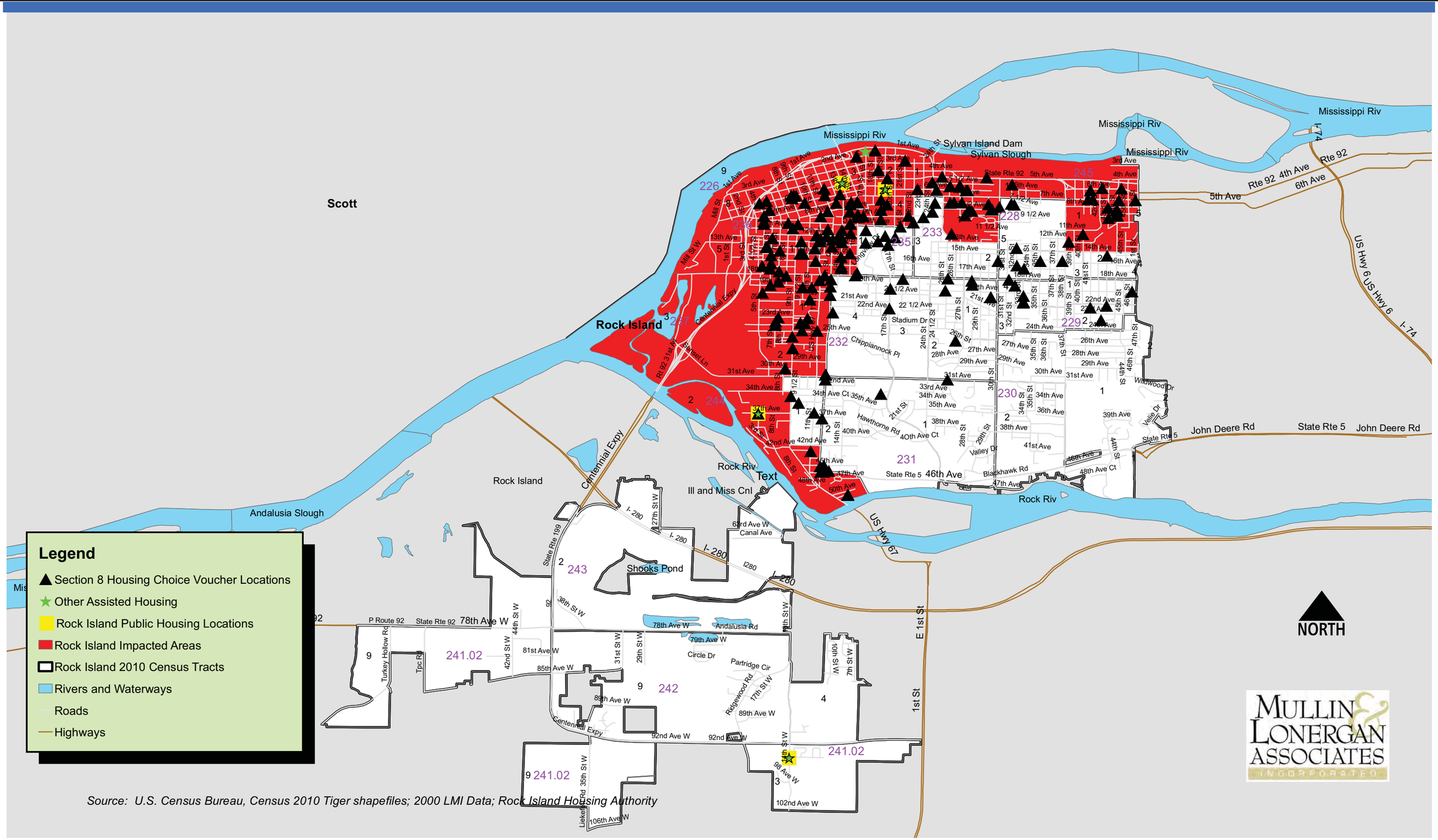
Sources: 2008 HUD: A Picture of Subsidized Housing; 2008-2013 City of Rock Island Consolidated Plan; City staff

In total, there were 996 units of privately owned assisted housing in Rock Island in 2012. Developments are generally scattered across Rock Island, with some in impacted areas and others outside impacted areas.

Map 4-7 shows the location of public housing units, Section 8 units and other assisted housing in Rock Island.

Map 4-7: Rock Island Public Housing, Section 8, and Other Assisted Housing Locations: City of Rock Island, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



Source: U.S. Census Bureau, Census 2010 Tiger shapefiles; 2000 LMI Data; Rock Island Housing Authority

I. Taxes

Taxes impact housing affordability. While not an impediment to fair housing choice, real estate taxes can impact the choice that households make regarding where to live. Tax increases can be burdensome to low-income homeowners, and tax increases are usually passed on to renters through rent increases. Tax rates for specific taxing districts and the assessed value of all properties are the two major factors that taxing bodies use to calculate their tax revenues. Determining a jurisdiction's relative housing affordability, in part, can be accomplished using tax rates.

However, straight comparison of tax rates to determine whether a property is affordable or unaffordable gives an incomplete and unrealistic picture of property taxes. Local governments with higher property tax rates, for example, may have higher rates because the assessed values of properties in the community are low, resulting in a fairly low tax bill for any given property. In all of the communities surrounding a jurisdiction, comparable rates for various classes of property (residential, commercial, industrial, etc) are assigned to balance each community's unique set of resources and needs. These factors and others out of the municipality's control must be considered when performing tax rate comparisons.

Due to the number and complexity of state and local variables and exemptions involved in determining property taxes, direct and accurate comparisons between and among the three cities cannot be made. Therefore, the following tax comparisons should be construed as broad in nature and are presented only for general consideration.

Iowa conducts a statewide property reassessment, or equalization, every two years, thereby minimizing inequity in the taxation system. The state also applies a "rollback" value to properties when necessary, to avoid dramatic increases in individuals' tax liabilities due to inflation.[1] The rollback rate establishes the taxable value of a property. The property tax for non-military personnel in Scott County, where the City of Davenport is situated, is calculated as follows:

- Gross Tax = (Assessed value of property x Rollback rate) x Consolidated tax levy
- Net Tax, or a property owner's tax liability = Gross Tax – Homestead Credit and Other Credits

In 2010, the rollback rate for residential property was 48.5299% of assessed value, and the consolidated tax levy in the City of Davenport was 40.29606 per $1,000 taxable value of the property. The effective tax rate then was 19.55/$1,000 assessed value. Therefore, for a house with an assessed value of $100,000, the gross tax would be $1,955, or about $163 per month.

In Iowa in 2009, 42.0% of property taxes went to fund K-12 schools, while about 29.7% was used to fund city and municipal governments.[2] Because property taxes account for such a significant part of local budgets, tax credits and exemptions may require localities to reduce spending on schools and other social services, or for municipalities to find other sources of revenue. Lower income residents who depend on such services may be negatively impacted by these budget cuts or by increases in taxes like sales taxes.

In the cities of Moline and Rock Island, IL, property tax rates vary by area and are a consolidation of county, city, fire (Moline), township (Rock Island) and school district levies. Illinois figures taxes on equalized assessed value that is 1/3 of the market value and a tax rate stated in dollars per $100 of

[1] The Iowa Department of Revenue applies equalization every two years by comparing aggregate values to an independently completed sales ratio study, adjusting the assessment accordingly. "Rollback" refers to an assessment limitation formula intended to control increases in assessed value for residential and agricultural property.
[2] Iowa Department of Revenue, *www.iowa.gov/tax/educate/78573.html*.

assessed valuation. [1] The average tax rate in Rock Island was $2.796 and for Moline $2.871 per $100 of equalized assessed value. Thus, a house with an equalized assessed value of $100,000, with no credits or exemptions, would have an average annual property tax ranging from $2,796 (Rock Island) to $2,871 (Moline), or $233 to $239 per month.

Figure 4-11
Effective Tax Rate per $1,000 Assessed Value in Moline and Rock Island, 2010

City	Tax Rate
Moline	28.7100
Rock Island	27.9600

**Effective tax rate combines both the rollback rate and consolidated tax levy.*

Source: Illinois Department of Revenue and Rock Island County Treasurer; Calculations by Mullin and Lonergan Associates, Inc.

All three municipalities offer exemptions and credits for the elderly and disabled, in addition to a home improvement exemption (Rock Island County). Additional efforts have been made in recent years to reduce residents' tax liabilities. Regular equalization and reassessment policies in both Iowa and Illinois ("Township Equalization Factor") also reduce the likelihood of inequality among tax rates, and help to ensure residents are being taxed appropriately.

If residential property taxes were the only factor in a person's decision where to live, then Davenport's lower taxes provide reduced housing costs.

J. Public Transportation

Households without a vehicle, which in most cases are low-moderate income households, are at a disadvantage in accessing jobs and services, particularly if public transit is inadequate or absent. Access to public transit is critical to these households. Without convenient access to public transportation, employment is potentially at risk and the ability to remain housed is threatened. The transportation linkages between residential areas (of concentrations of minority and low and moderate-income persons) and employment opportunities are key to insuring and expanding fair housing choice.

There are two public transit systems operating in the area of the three entitlement cities---Citibus in Davenport and MetroLINK in Moline and Rock Island. Davenport Citibus, a division of the city's Department of Public Works, offers fixed bus routes Monday through Friday from 6:00 AM to 6:30 PM, and on Saturday from 9:00 AM to 6:30 PM. It also provides a demand-response Saturday subscription service from 6:00 AM to 9:00 AM which requires reservations. There is no service on Sundays or major holidays.

The City of Davenport contracts with River Bend Transit to provide Americans with Disabilities Act paratransit service for those who are unable to access Citibus's fixed route service.

River Bend Transit also operates a Job Access and Reverse Commute (JARC) Program in Davenport. JARC is a time and space available work shuttle transit program that provides curb-to-

[1] Quad Cities First web site, Illinois Taxes.

curb service for work and work-related trips, including child care, training programs, and job search. This program is available to low-income Davenport residents who are not served or are underserved by public transit.

MetroLINK operates in Moline and Rock Island. It has fixed bus routes with the following hours of operation: Monday through Friday from 5:00 AM to 9:45 PM, Saturday from 7:00 AM to 6:30 PM, and Sunday from 8:00 AM to 4:30 PM. (The system's Tyson Foods route operates 3:15 AM to 1:15 AM Monday through Friday.)

MetroLINK offers paratransit service to those who are unable to use regular bus service. Paratransit service is provided "curb-to-curb" and is limited to locations within three-fourths of a mile of fixed route service. Paratransit service is available Monday through Friday from 7:00 AM to 9:00 PM, Saturday from 7:00 AM to 5:00 PM, and Sunday from 8:00 AM to 5:00 PM.

1. Destinations and Routes

Fixed-route buses provide service to public housing and other assisted housing sites in the three entitlement cities. These fixed routes also traverse or are within walking distance of areas of racial and ethnic concentrations, shopping opportunities, medical services, schools, and employment centers that supply low-skill and entry-level jobs.

However, many stakeholders interviewed during the preparation of the AI noted the limited operating hours of the area public transit systems and the difficulties this poses for second and third shift workers whose shifts begin or end before or after the systems' daily operating hours. Limited resources often prevent adequate service offerings for these workers.

Stakeholders also noted the long travel times needed for commutes that require transfers between routes and the difficulties encountered in relying on public transit for travel from one side of the river to the other.

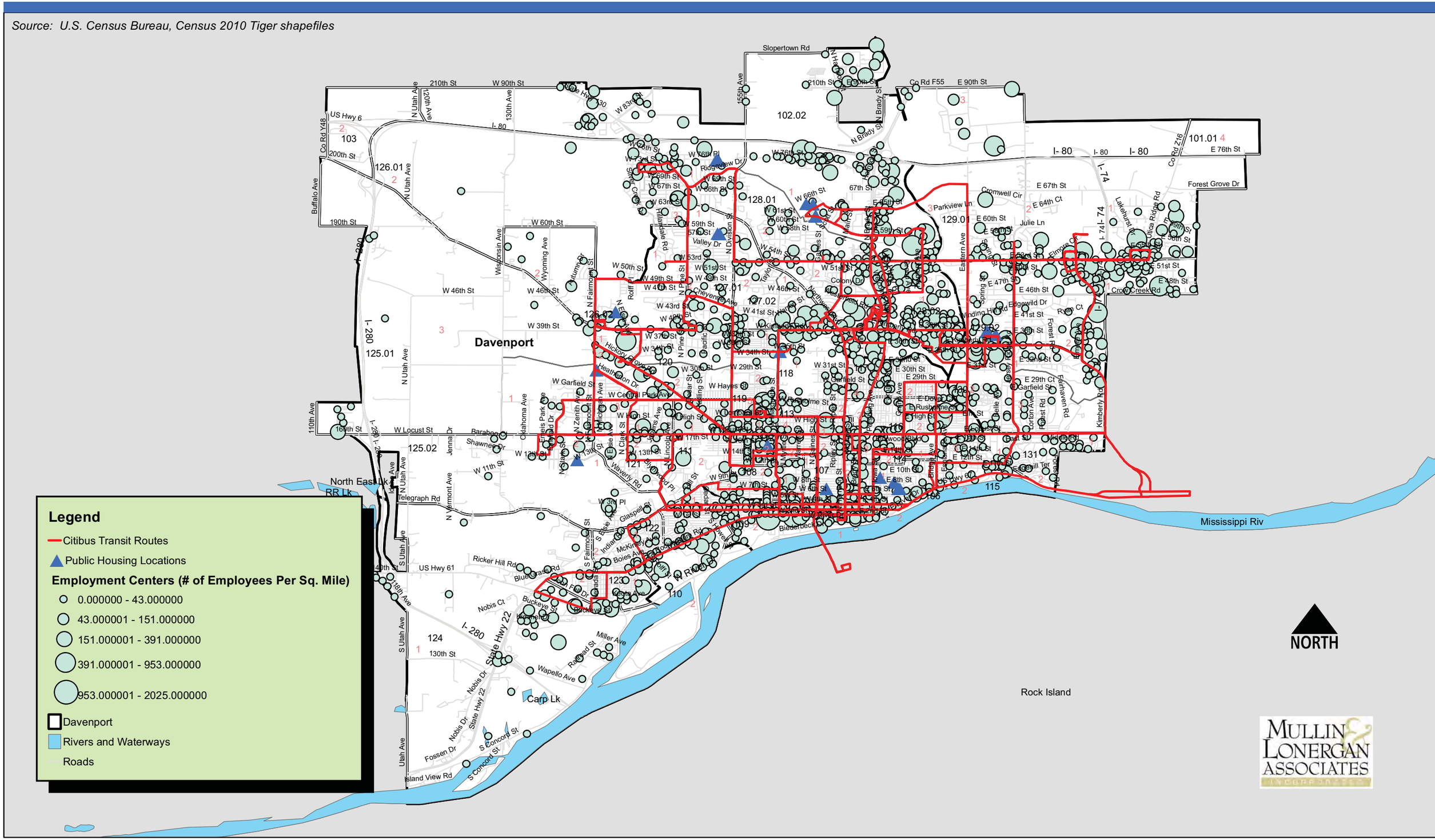
Public transit service availability is limited due to inadequate funding. However, Citibus and MetroLINK have worked to ensure transit connections where they are most needed (e.g., linking lower-income populations and employment centers) to the greatest extent possible. (MetroLINK's aforementioned Tyson Food route is an example of a fixed route that was specifically designed to accommodate the work schedules of lower-income employees at the Tyson Foods plant.)

Maps 4-8, 4-9 and 4-10 illustrate existing transit routes and their proximity to public housing sites and employment centers.

Map 4-8: Davenport Public Housing Locations, Transportation, and Employment Centers: City of Davenport, Iowa

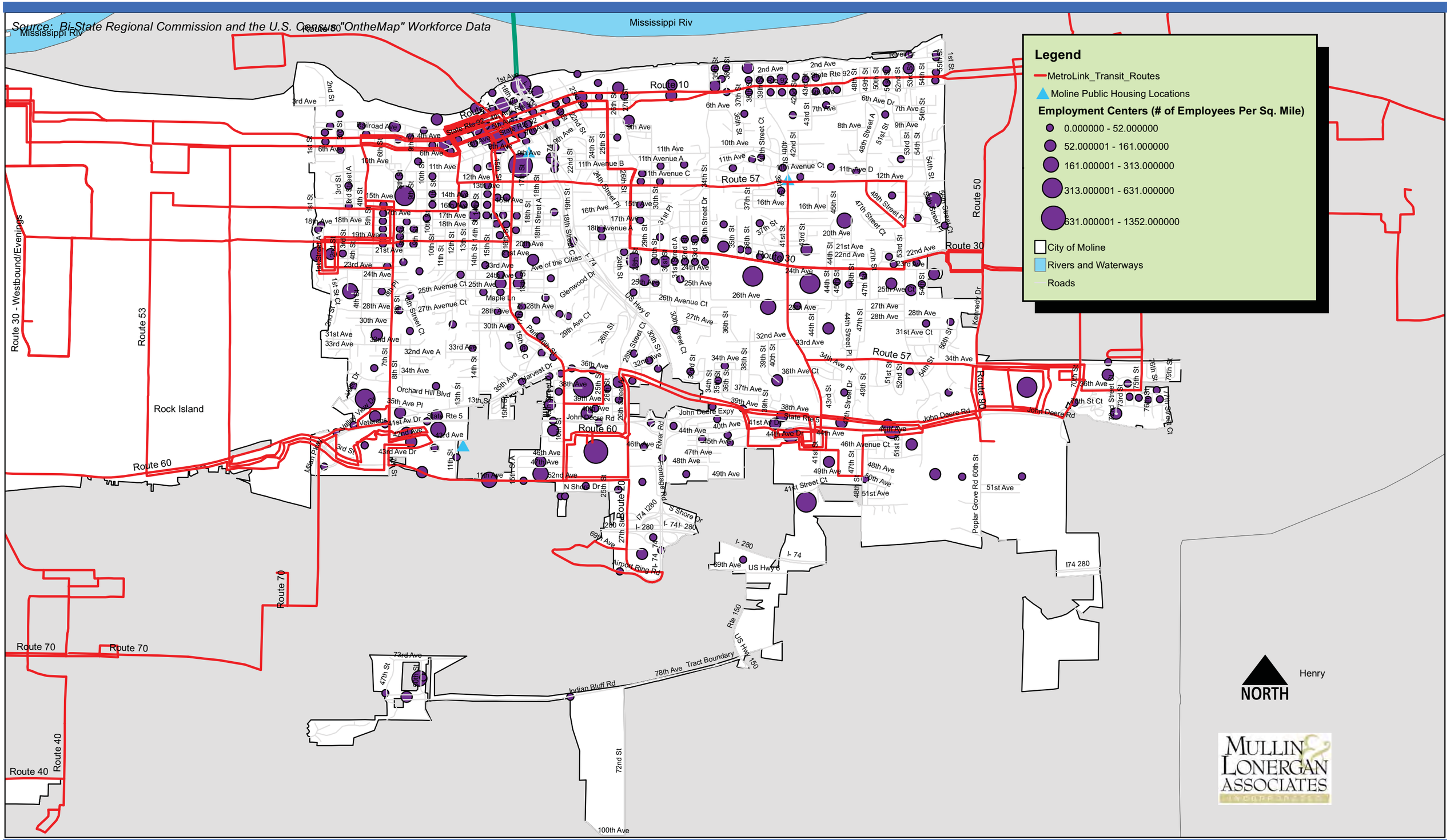
Analysis of Impediments to Fair Housing Choice, 2012

Source: U.S. Census Bureau, Census 2010 Tiger shapefiles



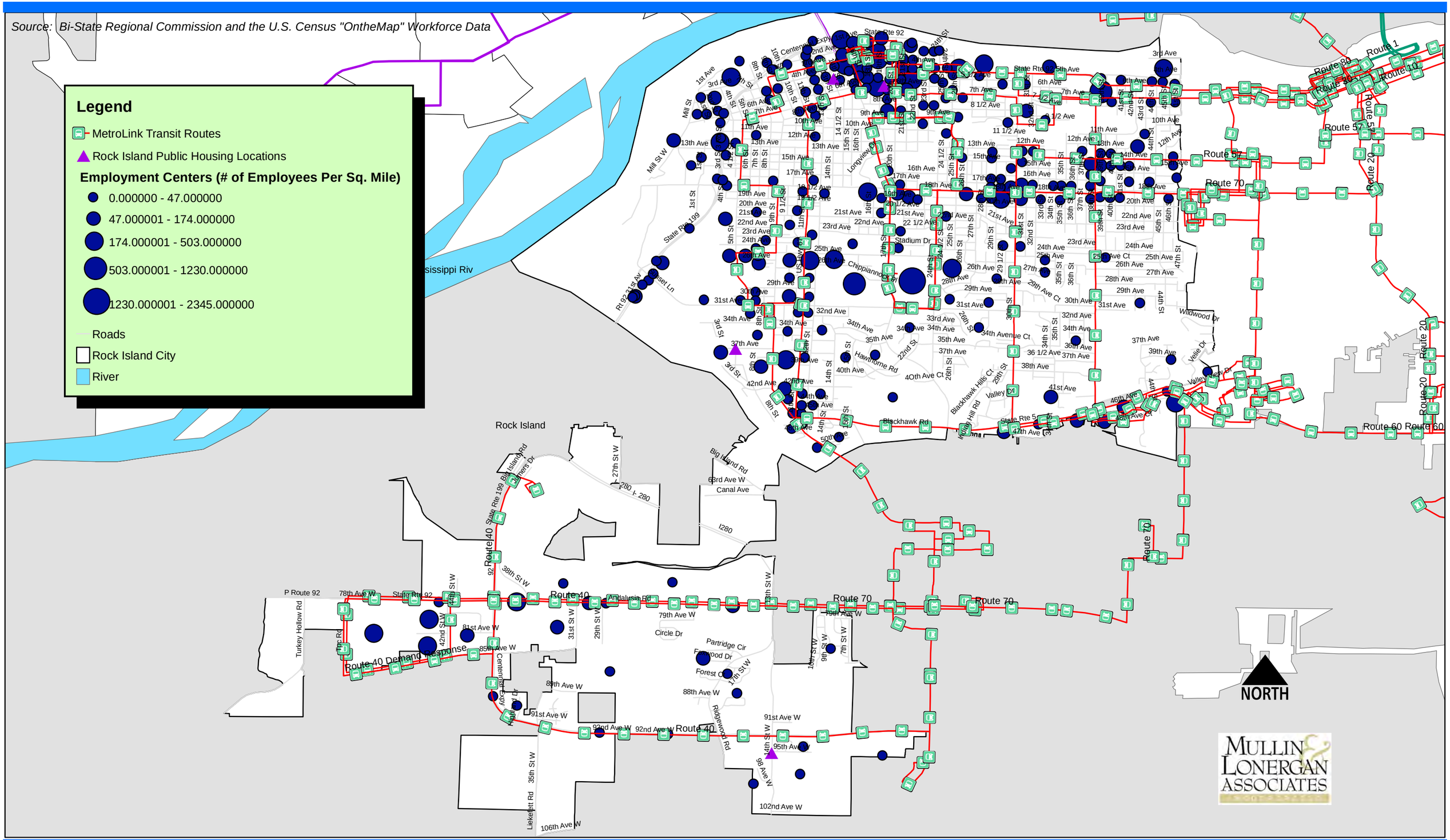
Map 4-9: Moline Public Housing Locations, Transportation and Employment Centers: Rock Island, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



Map 4-10: Rock Island Public Housing Locations, Transportation and Employment Centers: Rock Island, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



2. Accessibility

All Citibus and MetroLINK fixed-route buses are equipped with wheelchair lifts in accordance with the American with Disabilities Act (ADA). For those unable to access fixed-route bus services, both Citibus and MetroLINK provide ADA paratransit services.

3. Transportation Planning

The Bi-State Regional Commission, the Quad Cities' Metropolitan Planning Organization (MPO) for transportation, has produced a long range transportation plan, the 2040 Long Range Transportation Plan. In the citizen input survey conducted for this study, about 25% of the survey respondents rated ease of travel by public transit and frequency of bus service as bad or very bad. These opinions were echoed by a number of stakeholders interviewed during the AI process. As noted above, the lack of regular, fixed-route bus service with adequate frequency and hours of service places transit-dependent residents at a distinct disadvantage concerning access to housing, jobs and services.

Stakeholders and transit agencies cited the following priority public transit issues/needs in Davenport, Moline and Rock Island:

- Need for adequate public transit funding
- Need for better coordination and communication between and among area transit agencies
- Consideration of public transit issues when siting group homes and multifamily residential developments, e.g., proximity of existing bus routes, topography suitable for bus access, site design that accommodates bus turning movements, etc. Municipal land development processes should include working with developers to incorporate public transit considerations into their site selection and design processes prior to final plan design and construction.
- Need for extended hours of operation for fixed routes in Davenport to mirror service hours in Moline and Rock Island and/or increased JARC-funded service or affordable taxi service to give second and third shift workers more options
- Need for more frequent bus service
- Need for increased coordination between Citibus and MetroLINK to allow better city-to-city/state-to-state access to jobs
- Increased density of those residents most likely to use public transit

MetroLINK is involved in the transit-oriented developments (TODs) in Moline and Rock Island. The creation of higher density, mixed-use TODs proximate to public transit facilities can provide an opportunity for the inclusion of an affordable housing component and, therefore, greater housing choice for members of the protected classes in Davenport, Moline and Rock Island.

In 2011, Moline applied for a $1.2 million HUD Sustainable Communities Initiative grant for a project to create an alternative transportation network that would connect the downtown Moline Centre with adjacent neighborhoods and the neighborhoods with one another. The proposed transportation corridors were intended to accommodate trolley, bicycle and pedestrian traffic that would link people, housing and jobs. Anticipated

project benefits included more housing choices, economically viable neighborhoods, infill development, targeted residential rehabilitation, and redevelopment opportunities in neighborhoods adjacent to downtown Moline. These benefits would produce sustainable neighborhoods with healthy living environments and linkages among jobs, housing and transit. Unfortunately, HUD did not select Moline's grant application for funding, but the city's application demonstrates its commitment to enhanced connectivity between residents, housing and jobs.

The lack of public transit service between the hours of 8 pm and 5 am, generally, is an impediment to fair housing choice because limited service hours and routes greatly restrict housing choice and job linkages for lower income, transit-dependent residents who work late evening and overnight shifts.

Fair Housing Best Practice:

Moline modified its development code to make transit accessibility a requirement for approval of residential development plans.

5. Evaluation of Private Sector Policies

In addition to the public sector policies that influence fair housing choice, there are private sector policies that can influence the development, financing, and advertising of real estate. While the cities cannot be held responsible for impediments to fair housing choice identified in private sector policies, each local government does have an obligation to identify such impediments and bring them to the attention of the appropriate entity. In some cases, it is appropriate and even expected that the local government will attempt to communicate the existence of such impediments to the appropriate entity. For example, if real estate advertisements in a local publication are noted to contain questionable language that may be discriminatory, grantees should advise the publication of its legal obligations under the Fair Housing Act, and state and local fair housing laws..

In this section of the AI, mortgage lending practices, high-cost lending and real estate advertising are analyzed.

A. Mortgage Lending Practices

The Fair Housing Act prohibits lenders from discriminating against members of the protected classes in granting mortgage loans, providing information on loans, imposing the terms and conditions of loans (such as interest rates and fees), conducting appraisals, and considering whether to purchase loans. Unfettered access to fair housing choice requires fair and equal access to the mortgage lending market regardless of race, color, national origin, religion, sex, familial status, disability, marital status, sexual orientation, gender identity, or any other state or local statutorily protected basis.

An analysis of mortgage applications and their outcomes can identify possible discriminatory lending practices and patterns in a community. Home Mortgage Disclosure Act (HMDA) data contains records for all residential loan activity reported by banks pursuant to the requirements of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989. Any commercial lending institution that makes five or more home mortgage loans annually must report all residential loan activity to the Federal Reserve Bank, including information on applications denied, withdrawn, or incomplete by race, sex, and income of the applicant. This information is used to determine whether financial institutions are serving the housing needs of their communities.

The most recent HMDA data available for the cities of Davenport, Moline and Rock Island is from 2008 to 2010. The data included for analysis constitutes all types of applications received by lenders by families: home purchase, refinancing, or home improvement mortgage applications for one- to four-family dwellings and manufactured housing units for each of the three cities. The demographic and income information provided pertains to the primary applicant only. Co-applicants were not included in the analysis.

Each of the three cities will be treated separately for purposes of the analysis.

i. Davenport Mortgage Applicant Characteristics

Across the city of Davenport during the last three years, lenders received 13,098 applications for mortgage refinancing, 7,856 applications for home purchase mortgages, and 2,074 applications for home improvement equity loans. Of these, home improvement loans were the most likely to be successful, as 59.5% were originated. Almost 9% of home improvement loan applications were withdrawn or left incomplete, and 15.8% were denied. By comparison, over half (52.4%) of home purchase loans were originated. Thirty-six percent of home purchase loans were withdrawn or incomplete. Over 36% were denied,

the highest rate of all applications. Refinancing loans represent the largest share of all applications, with 56.9% of the total.

The vast majority of applications involved one- to four-family housing structures, with only 287 applications (just over 1%) requesting financing for manufactured units. The denial rate for manufactured units, 38.7%, was substantially higher than the overall denial rate of 13.5% for one-to-four family units.

The most commonly sought type of financing was conventional loans, a category that represented over two-thirds of all loan applications. An additional 28.4% of applications were for loans insured by the Federal Housing Administration (FHA), a type of federal assistance that has historically benefited lower-income residents. Smaller percentages of applications were for loans backed by the Department of Veterans Affairs (VA). Only four loans were backed by the Farm Services Administration or Rural Housing Service (FSA/RHS).

The racial composition of loan applicants differs somewhat from the city's general demographic distribution. While 4.2% of all Davenport households in 2010 were Hispanic, Hispanic households constitute only 3.2% of the loan applications for which racial/ethnic data were reported. Similarly, 10.2% of all households in the city were Black, while only 3.5% of the loan applications for which race was reported were filed by Black households. White households are overrepresented among mortgage applicants, representing a share of applications exceeding their share of all households citywide. Asian households represent 1.5% of the city's total households and 1.3% of the loan applications for which race was reported. Lower participation in the market for home mortgages by Black and Hispanic households is likely a reflection of the lower median incomes among those groups.

Grouping all three years of data into the analysis increases the likelihood that differences among groups are statistically significant. This is especially important in view of the data on mortgage application denials, which also suggests differences according to race and ethnicity.

Figure 5-1
Cumulative Summary Report Based on Action Taken Mortgage Data in Davenport, 2008-2010

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/ Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Purpose										
Home purchase	7,856	34.1%	4,119	52.4%	207	2.6%	609	7.8%	2,862	36.4%
Refinancing	13,098	56.9%	6,409	48.9%	626	4.8%	2,021	15.4%	3,781	28.9%
Home improvement	2,074	9.0%	1,234	59.5%	84	4.1%	544	26.2%	184	8.9%
Loan Type										
Conventional	15,814	68.7%	8,486	53.7%	684	4.3%	2,297	14.5%	4,098	25.9%
FHA	6,543	28.4%	2,935	44.9%	222	3.4%	834	12.7%	2,462	37.6%
VA	667	2.9%	339	50.8%	11	1.6%	42	6.3%	266	39.9%
FHS/RHS	4	0.0%	2	50.0%	0	0.0%	1	25.0%	1	25.0%
Property Type										
One to four-family unit	22,632	98.3%	11,602	51.3%	883	3.9%	3,050	13.5%	6,750	29.8%
Manufactured housing unit	287	1.2%	73	25.4%	31	10.8%	111	38.7%	72	25.1%
Applicant Race										
Native American	78	0.3%	30	38.5%	4	5.1%	28	35.9%	15	19.2%
Asian	307	1.3%	158	51.5%	18	5.9%	66	21.5%	57	18.6%
Black	804	3.5%	364	45.3%	33	4.1%	207	25.7%	187	23.3%
Hawaiian	43	0.2%	25	58.1%	1	2.3%	6	14.0%	11	25.6%
White	17,495	76.0%	10,218	58.4%	786	4.5%	2,490	14.2%	3,719	21.3%
No information	1,401	6.1%	617	44.0%	66	4.7%	356	25.4%	318	22.7%
Not applicable	2,900	12.6%	350	12.1%	9	0.3%	21	0.7%	2,520	86.9%
Hispanic**	736	3.2%	401	54.5%	39	5.3%	141	19.2%	135	18.3%
Total	**23,028**	**100.0%**	**11,762**	**51.1%**	**917**	**4.0%**	**3,174**	**13.8%**	**6,827**	**29.6%**

Source: Federal Financial Institutions Examination Council, 2008 to 2010

Note: Percentages in the Originated, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated from their respective total

* Total applications also include loans purchased by another institution.

** Hispanic ethnicity is counted independently of race.

ii. Davenport Mortgage Application Denials

During the years 2008 through 2010, a total of 3,174 mortgage loan applications were denied across Davenport. The overall cumulative denial rate was 13.8%, with denials by race and ethnicity ranging from 14.2% for White households to 35.9% for Native American households. In reporting denials, lenders are required to list at least one primary reason for denial and may list up to two secondary reasons. A substantial proportion of denials did not list a reason. The primary basis for the rejection of 2,958 applications, or 93% of all denials, was left blank. Typically, common reasons given for denial include lack of collateral, debt-to-income ratio, and credit history. Due to the lack of information, it is impossible to analyze the reasons for mortgage loan application denials.

Mortgage loan denial rates among racial and ethnic minority applicants were higher than the denial rate for White applicants between 2008 and 2010.

Rejections for Black, Hispanic, and Other Race applicants were less likely to be accompanied by a reason for denial. Overall, the reasons for denial were limited.

For this analysis, lower-income households include those with incomes between 0%-80% of MFI, while upper-income households include households with incomes above 80% MFI. Applications made by lower-income households accounted for 35.9% of all denials between 2008 and 2010, though they accounted for 36.3% of total applications for those three years.

Figure 5-2 distributes the denials by income level among racial and ethnic groups. Among lower-income households, denial rates were generally higher for minorities. While the overall lower-income denial rate was 13.6%, the denial rates for lower-income households of Blacks, Other Race (consisting primarily of Native Americans), and Hispanics, were 23.1%, 17.0%, and 14.6%, respectively.

The overall denial rate for upper-income households was 13.8%. Notably, denial rates for upper-income minority households were higher (in some cases much higher) than for lower-income minority households across the racial/ethnic group spectrum. Lower-income White households were less likely to experience denial than any of the upper-income minority groups analyzed. This pattern is consistent with discrimination.

Figure 5-2
Mortgage Application Denials by Household Race/Ethnicity in Davenport, 2008-2010

		Total	White	Black	Asian	Other	No data	Hispanic*
Lower-Income	Total Applications	8,363	6,992	372	177	53	769	350
	Denials	1,141	900	86	20	9	126	51
	% Denied	**13.6%**	**12.9%**	**23.1%**	**11.3%**	**17.0%**	**16.4%**	**14.6%**
Upper-Income	Total Applications	11,325	9,578	375	120	63	1,189	348
	Denials	1,568	1,210	98	38	19	203	66
	% Denied	**13.8%**	**12.6%**	**31.7%**	**19.0%**	**30.2%**	**17.1%**	**26.1%**
Total	Total Applications	23,028	17,495	804	307	121	4,301	736
	Denials	3,174	2,490	207	66	34	377	141
	% Denied	**13.8%**	**14.2%**	**25.7%**	**21.5%**	**28.1%**	**8.8%**	**19.2%**

Note: Total also includes 465 applications for which no income data was reported.
* Hispanic ethnicity is counted independently of race.
Source: Federal Financial Institutions Examination Council, 2008 to 2010

Over the course of the three years studied, upper-income minority households experienced denial rates that were higher than those of lower-income White households.

Among upper-income Asian, Hispanic, Other Race (primarily Native American), and Black households, mortgage denial rates were 31.7%, 19.0%, 30.2%, and 26.1%, respectively, compared to a denial rate of 12.6% among upper-income Whites. While this fact alone does not imply an impediment to fair housing choice, the pattern is consistent with discrimination.

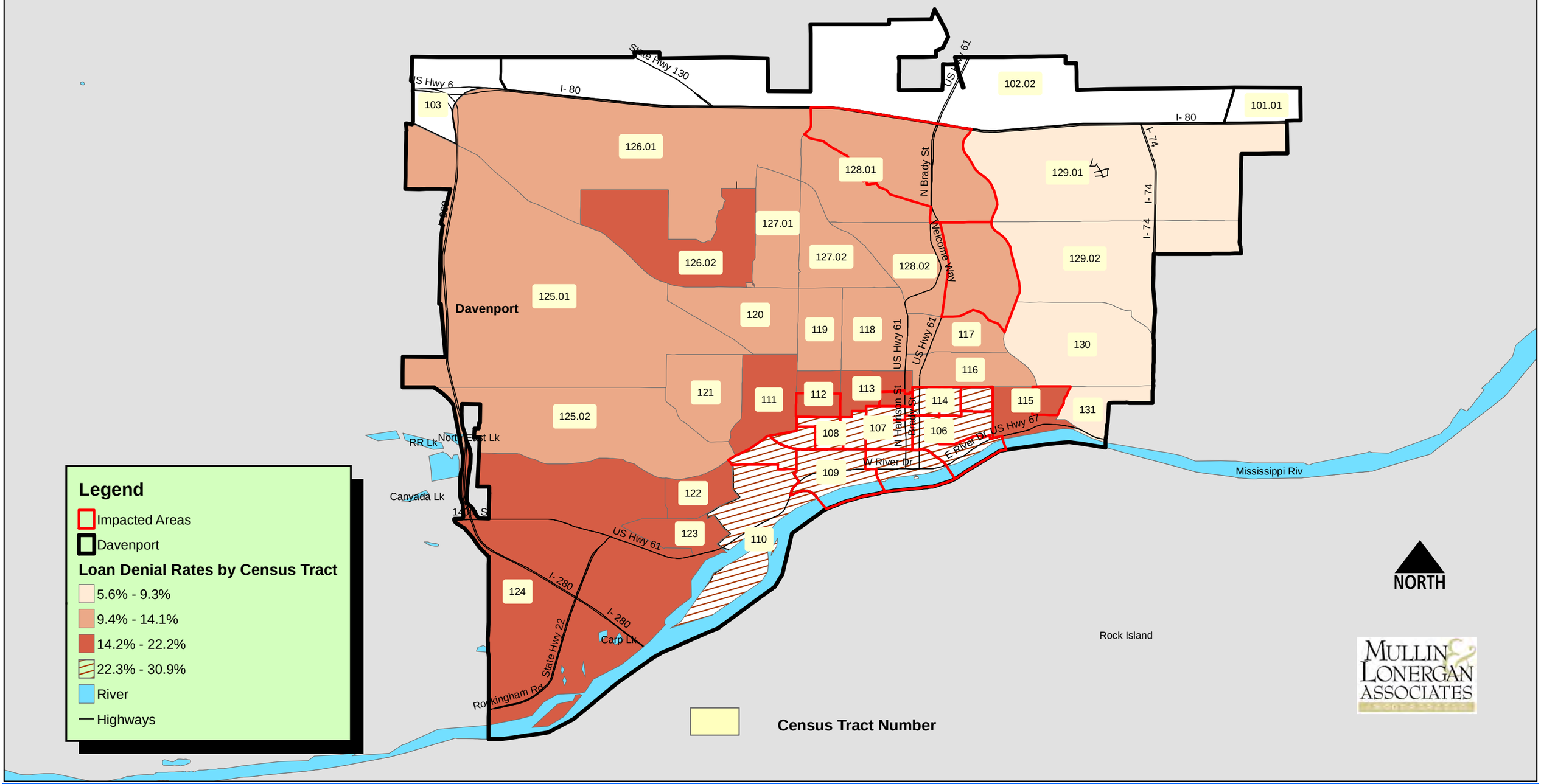
Denial rates by census tract across Davenport are illustrated in Map 5-1. Of the 33 total tracts within the City, census tract 109 reported a denial rate of 30.9%, and two other tracts, 106 and 108, had denial rates of 28.1% and 27.3%, respectively. These census tracts are located in an area of minority and/or LMI concentration.

Map 5-1: Loan Denial Rates by Census Tract, 2008 - 2010: City of Davenport, Iowa

Analysis of Impediments to Fair Housing Choice, 2012

Source: U.S. Census Bureau, Census 2010 Tiger shapefiles, 2008 - 2010 Federal Financial Institution Examination Council (FFIEC) HMDA Data

Note: Areas in white do not contain any houses, therefore, loan denial rate data is not applicable in these areas.



iii. High-Cost Lending in Davenport

The widespread housing finance market crisis of recent years has brought a new level of public attention to lending practices that victimize vulnerable populations. Subprime lending, designed for borrowers who are considered a credit risk, has increased the availability of credit to low-income persons. At the same time, subprime lending has often exploited borrowers, piling on excessive fees, penalties, and interest rates that make financial stability difficult to achieve. Higher monthly mortgage payments make housing less affordable, increasing the risk of mortgage delinquency and foreclosure and the likelihood that properties will fall into disrepair.

Some subprime borrowers have credit scores, income levels, and down payments high enough to qualify for conventional, prime loans, but are nonetheless steered toward more expensive subprime mortgages. This is especially true of minority groups, which tend to fall disproportionately into the category of subprime borrowers. The practice of targeting minorities for subprime lending qualifies as mortgage discrimination.

Since 2005, HMDA data has included price information for loans priced above reporting thresholds set by the Federal Reserve Board. This data is provided by lenders via Loan Application Registers and can be aggregated to complete an analysis of loans by lender or for a specified geographic area. HMDA does not require lenders to report credit scores for applicants, so the data does not indicate which loans are subprime. It does, however, provide price information for loans considered "high-cost."

A loan is considered high-cost if it meets one of the following criteria:

- A first-lien loan with an interest rate at least three percentage points higher than the prevailing U.S. Treasury standard at the time the loan application was filed. The standard is equal to the current price of comparable-maturity Treasury securities.
- A second-lien loan with an interest rate at least five percentage points higher than the standard.

Not all loans carrying high APRs are subprime, and not all subprime loans carry high APRs. However, high-cost lending is a strong predictor of subprime lending, and it can also indicate a loan that applies a heavy cost burden on the borrower, increasing the risk of mortgage delinquency.

Between 2008 and 2010, there were 11,762 home purchase, refinance, or home improvement loans made for single-family or manufactured units in Davenport. Of this total, 10,407 disclosed the borrower's household income and 904 reported high-cost mortgages. Overall, upper-income Black and Hispanic households were slightly more likely to have high-cost mortgages than lower-income White households.

An analysis of loans in Davenport by race and ethnicity reveals varying results. Among Blacks, Asians and Hispanics, regardless of income, rates of high-cost mortgages exceeded the overall rates of 8.9% for lower-income applicants, and 8.1% for upper-income applicants. Among Blacks and Hispanics, upper-income households were more likely to receive high-cost loans.

Disparities were also apparent among upper-income households. White households were the least likely to have high-cost mortgages (8.3%). The high-cost mortgage rate for upper-income Black households was 15.6%, while Hispanic households experienced a high-cost loan rate of 12.4%. By comparison, the high-cost loan rate for Black upper-income

households was almost twice as high as the rate for White households. Details appear in Figure 5-3 and in Map 5-2

Figure 5-3
High-Cost Loans by Race/Ethnicity and Income in Davenport, 2008-2010

		Total	White	Black	Asian	Other	No data	Hispanic*
Lower-Income	Total Originations	4,623	4,038	137	53	26	369	172
	High-Cost	411	361	19	9	5	17	20
	% High-Cost	**8.9%**	**8.9%**	**13.9%**	**17.0%**	**19.2%**	**4.6%**	**11.6%**
Upper-Income	Total Originations	5,784	5,018	180	84	21	481	193
	High-Cost	466	414	28	7	1	16	24
	% High-Cost	**8.1%**	**8.3%**	**15.6%**	**8.3%**	**4.8%**	**3.3%**	**12.4%**
Total	Total Originations	11,762	10,218	364	158	55	967	401
	High-Cost	904	790	48	16	6	44	44
	% High-Cost	**7.7%**	**7.7%**	**13.2%**	**10.1%**	**10.9%**	**4.6%**	**11.0%**

Note: Total also includes 1,355 loans for which no income data was reported.
* Hispanic ethnicity is counted independently of race.
Source: Federal Financial Institutions Examination Council, 2008 to 2010

Lower-income Asian, Black and Hispanic households in Davenport were more likely to receive high-cost mortgage loans than lower-income White households. In addition, upper-income Black households were twice as likely to receive high-cost mortgage loans than upper-income White households.

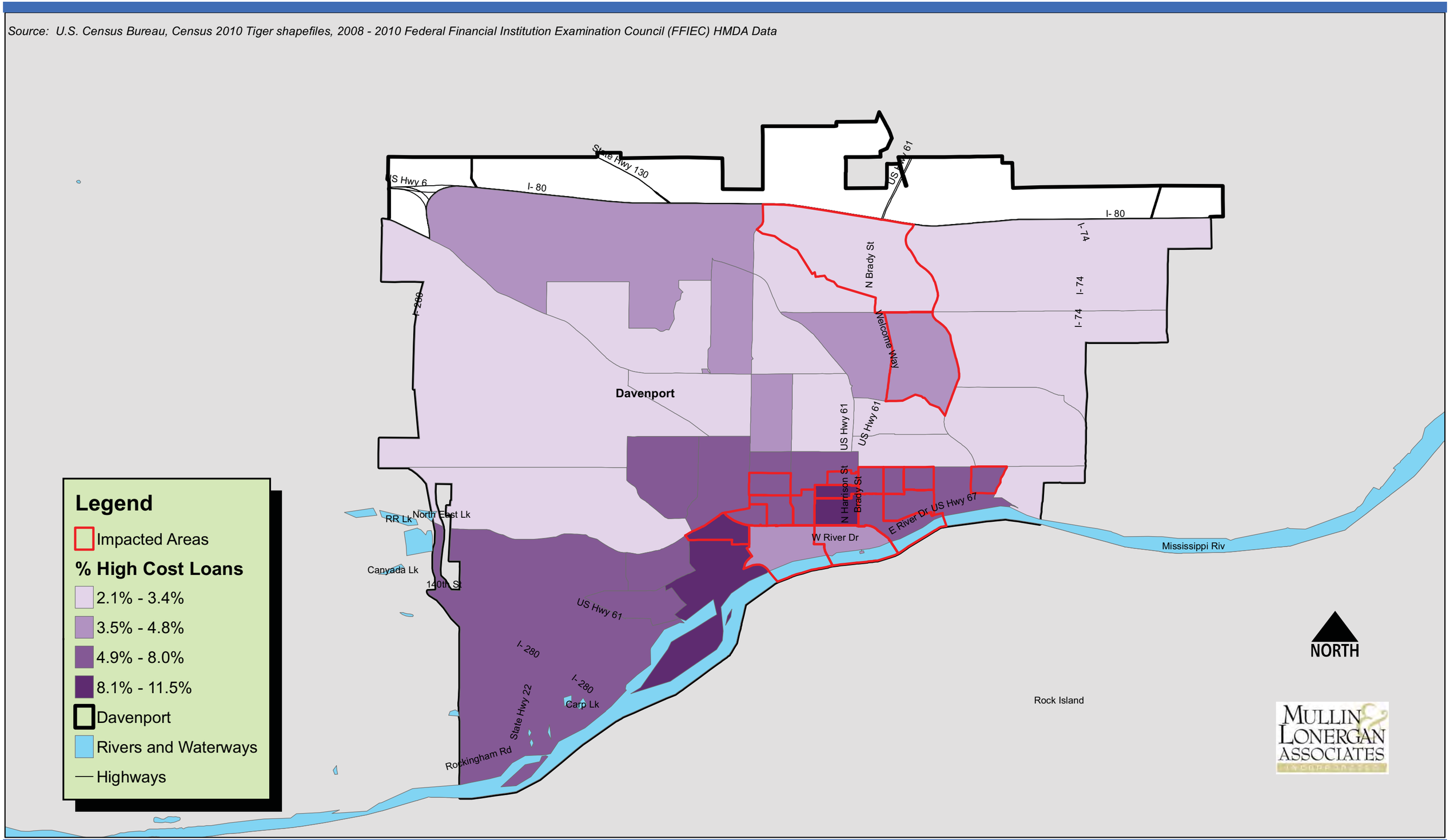
This trend places minority homeowners at greater risk for eviction, foreclosure, and bankruptcy. In addition, the patterns are consistent with discriminatory lending.

The distribution of high-cost loans by census tract across Davenport is depicted on Map 5-2. There are 13 tracts (tracts 106, 107, 108, 110, 111, 112, 113, 114, 115, 121, 122, 123 and 124) where high-cost mortgages constitute more than 4.8% of all mortgage loans, including two tracts where at least one in every 10 loans is high-cost. These two census tracts are CT 107, which has 11.5% high-cost mortgages, and CT 110, which has 10.2% high-cost mortgages. As Map 5-2 shows, most of the high-cost loan tracts are in Impacted Areas.

Map 5-2: High Cost Loans by Census Tract, 2008 - 2010: City of Davenport, Iowa

Analysis of Impediments to Fair Housing Choice, 2012

Source: U.S. Census Bureau, Census 2010 Tiger shapefiles, 2008 - 2010 Federal Financial Institution Examination Council (FFIEC) HMDA Data



iv. Annual Trends in Davenport

Studying mortgage application data on an annual basis allows insight into the influence of housing market trends on the behavior of applicants and banks. Figure 5-4 illustrates annual change.

Figure 5-4
Mortgage Application Loan Results in Davenport, 2008-2010

	2008		2009		2010	
	#	%	#	%	#	%
Total loans						
Applied for	**6,988**	**100.0%**	**8,595**	**100.0%**	**7,445**	**100.0%**
Black	298	4.3%	286	3.3%	220	3.0%
White	5,347	76.5%	6,507	75.7%	5,641	75.8%
Asian	113	1.6%	117	1.4%	77	1.0%
Hispanic*	263	3.8%	259	3.0%	214	2.9%
Other race	37	0.5%	46	0.5%	38	0.5%
No information/NA	1,193	17.1%	1,639	19.1%	1,469	19.7%
Originated	**3,319**	**47.5%**	**4,433**	**51.6%**	**4,010**	**53.9%**
Black	120	40.3%	137	47.9%	107	48.6%
White	2,818	52.7%	3,884	59.7%	3,516	62.3%
Asian	56	49.6%	63	53.8%	39	50.6%
Hispanic*	139	52.9%	148	57.1%	114	53.3%
Other race	11	29.7%	27	58.7%	17	44.7%
No information/NA	314	26.3%	322	19.6%	331	22.5%
Originated - High Cost	**569**	**17.1%**	**341**	**7.7%**	**127**	**3.2%**
Black	31	25.8%	17	12.4%	3	2.8%
White	490	17.4%	300	7.7%	122	3.5%
Asian	11	19.6%	2	3.2%	-	0.0%
Hispanic*	31	22.3%	13	8.8%	1	0.9%
Other race	4	36.4%	11	40.7%	-	0.0%
No information/NA	33	10.5%	11	3.4%	2	0.6%
Denied	**1,263**	**18.1%**	**1,017**	**11.8%**	**894**	**12.0%**
Black	96	32.2%	66	23.1%	45	20.5%
White	981	18.3%	814	12.5%	695	12.3%
Asian	21	18.6%	26	22.2%	19	24.7%
Hispanic*	59	22.4%	37	14.3%	45	21.0%
Other race	20	54.1%	8	17.4%	6	15.8%
No information/NA	145	12.2%	103	6.3%	129	8.8%

Note: Data is for home purchase, refinance and improvement loans for owner-occupied one-to-four family and manufactured units. Other application outcomes include approved but not accepted, withdrawn, incomplete or purchase by another institution.

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2008-10

Housing markets across the country have experienced steep declines in sales volume and mortgage applications since 2008 as a result of buyer reticence in an unstable market. Counter to national trends, the number of applications in Davenport rose from 6,988 in 2008 to 7,445 in 2010.

Over the course of the three years studied, the percentage of applications that resulted in loan originations increased, on the whole and across most (with the exception of Whites) racial and ethnic groups. The number of loans that were high-cost dropped substantially from 2008 to 2010. This is likely a direct result of increasing statutory control over predatory lending practices. It is also possible that education and outreach related to borrowing has contributed to the decline in high-cost loans. Between 2008 and 2010, the proportion of applications resulting in denials declined from 18.1% to 12%. This change also occurred across all minority groups, with the exception of Asians, who experienced an increase.

Between 2008 and 2010, high-cost lending rates dropped substantially, on the whole and across all racial and ethnic groups.

This is likely a direct result of increased statutory control over predatory lending practices, as well as increasing borrower awareness.

v. Moline Mortgage Applicant Characteristics

Across the City of Moline during the last three years, lenders received 6,677 applications for mortgage refinancing, 3,541 applications for home purchase mortgages, and 1,202 applications for home improvement equity loans. Of these, home improvement loans were the most likely to be successful, as 64% were originated. Over 5% of home improvement loan applications were withdrawn or left incomplete, and 22% were denied. By comparison, over half (54.7%) of home purchase loans were originated. Almost 4% percent of home purchase loans were withdrawn or incomplete. Over 7% were denied, the lowest denial rate of all applications. Refinancing loans represent the largest share of all applications, with 58.5% of the total.

The vast majority of applications involved one- to four-family housing structures, with only 119 applications (1%) requesting financing for manufactured units. The denial rate for manufactured homes, 34.5%, was substantially higher than the overall denial rate of 12.5% for one-to-four family units.

The most commonly sought type of financing was conventional loans, a category that represented almost three-quarters of all loan applications. An additional 23.8% of applications were for loans insured by the Federal Housing Administration (FHA), a type of federal assistance that has historically benefited lower-income residents. Smaller percentages of applications were for loans backed by the Department of Veterans Affairs (VA). Only two loans were backed by the Farm Services Administration or Rural Housing Service (FSA/RHS).

The racial composition of loan applicants differs somewhat from the city's general demographic distribution. While 10.7% of all Moline households in 2010 were Hispanic, Hispanic households constitute only 6.6% of the loan applications for which racial/ethnic data were reported. Similarly, 3.5% of all households in the city were Black, while only 1.8% of the loan applications for which race was reported were filed by Black households.

White households are also underrepresented among mortgage applicants, representing a share of applications (81.1%) that is less than their share of all households citywide (87.7%). Asian households represent 2.0% of the city's households and 0.9% of the loan applications for which race was reported. Lower participation in the market for home mortgages by Black and Hispanic households is likely a reflection of the lower median incomes among those groups.

Grouping all three years of data into the analysis increases the likelihood that differences among groups are statistically significant. This is especially important in view of the data on mortgage application denials, which also suggests differences according to race and ethnicity.

Figure 5-5
Cumulative Summary Report Based on Action Taken Mortgage Data in Moline, 2008-2010

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/ Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Purpose										
Home purchase	3,541	31.0%	1,938	54.7%	127	3.6%	267	7.5%	132	3.7%
Refinancing	6,677	58.5%	3,629	54.4%	352	5.3%	918	13.7%	532	8.0%
Home improvement	1,202	10.5%	769	64.0%	51	4.2%	266	22.1%	68	5.7%
Loan Type										
Conventional	8,357	73.2%	5,004	59.9%	423	5.1%	1,093	13.1%	524	6.3%
FHA	2,721	23.8%	1,195	43.9%	99	3.6%	335	12.3%	188	6.9%
VA	340	3.0%	181	53.2%	8	2.4%	22	6.5%	20	5.9%
FHS/RHS	2	0.0%	1	50.0%	0	0.0%	1	50.0%	0	0.0%
Property Type										
One to four-family unit	11,271	98.7%	6,331	56.2%	502	4.5%	1,408	12.5%	718	6.4%
Manufactured housing unit	119	1.0%	26	21.8%	24	20.2%	41	34.5%	14	11.8%
Applicant Race										
Native American	44	0.4%	23	52.3%	0	0.0%	14	31.8%	3	6.8%
Asian	98	0.9%	55	56.1%	5	5.1%	14	14.3%	9	9.2%
Black	201	1.8%	102	50.7%	9	4.5%	50	24.9%	16	8.0%
Hawaiian	12	0.1%	6	50.0%	3	25.0%	3	25.0%	0	0.0%
White	9,265	81.1%	5,839	63.0%	469	5.1%	1,234	13.3%	623	6.7%
No information	593	5.2%	258	43.5%	40	6.7%	132	22.3%	80	13.5%
Not applicable	1,207	10.6%	98	8.1%	4	0.3%	4	0.3%	1	0.1%
Hispanic**	754	6.6%	422	56.0%	63	8.4%	159	21.1%	42	5.6%
Total	**11,420**	**100.0%**	**6,381**	**55.9%**	**530**	**4.6%**	**1,451**	**12.7%**	**732**	**6.4%**

Source: Federal Financial Institutions Examination Council, 2008 to 2010

Note: Percentages in the Originated, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated from their respective total

* Total applications also include loans purchased by another institution.

** Hispanic ethnicity is counted independently of race.

vi. Moline Mortgage Application Denials

During the years 2008 through 2010, a total of 1,451 mortgage loan applications were denied across Moline. The overall cumulative denial rate was 12.7%, with denials by race and ethnicity ranging from 13.3% for White households to 31.8% for Native American households. In reporting denials, lenders are required to list at least one primary reason for denial and may list up to two secondary reasons. A substantial proportion of denials did not list a reason. The primary basis for the rejection of 1,321 applications, or 91% of all

denials, was left blank. This was far more prevalent in the denials for Black households, almost all of which (94%) were rejected without a reported reason. Other common reasons given for denial include lack of collateral, debt-to-income ratio, and credit history. Due to the lack of information, it is impossible to analyze the reasons for mortgage loan application denials.

Mortgage loan denial rates among racial and ethnic minority applicants were higher than the denial rate for White applicants between 2008 and 2010.

Rejections for Black, Hispanic, and Other Race applicants were less likely to be accompanied by a reason for denial. Overall, the reasons for denial were limited, particularly among Black applicants. Nearly all mortgage loan applications denied among Black households did not list a reason for the denial.

For this analysis, lower-income households include those with incomes between 0%-80% of MFI, while upper-income households include households with incomes above 80% MFI. Applications made by lower-income households accounted for 29.9% of all denials between 2008 and 2010, though they accounted for 34.1% of total applications for those three years.

Figure 5-6 distributes the denials by income level among racial and ethnic groups. Among lower-income households, denial rates were generally higher for minorities. While the overall lower-income denial rate was 11.1%, the denial rates for lower-income households of Other Race (consisting primarily of Native Americans), Hispanics, and Blacks were 17.9%, 15%, and 14.1%, respectively.

While denial rates were are generally lower for upper-income households, the HMDA data for Moline revealed a different trend, possibly due to the sample size. The overall upper-income denial rate was 11.8%, compared to 15.5%, 24.1%, 35.7%, and 22.1% for upper-income Asian, Hispanic, Other Race, and Black households, respectively. Lower-income White households were less likely to experience denial than any of these four upper-income minority groups. This pattern is consistent with discrimination.

Figure 5-6
Mortgage Application Denials by Household Race/Ethnicity in Moline, 2008-2010

		Total	White	Black	Asian	Other	No data	Hispanic*
Lower-Income	Total Applications	3,904	3,449	85	23	28	319	420
	Denials	434	372	12	1	5	44	63
	% Denied	**11.1%**	**10.8%**	**14.1%**	**4.3%**	**17.9%**	**13.8%**	**15.0%**
Upper-Income	Total Applications	6,041	5,348	104	71	28	490	290
	Denials	713	599	23	11	10	70	70
	% Denied	**11.8%**	**11.2%**	**22.1%**	**15.5%**	**35.7%**	**14.3%**	**24.1%**
Total	Total Applications	11,420	9,265	201	98	56	1,800	754
	Denials	1,451	1,234	50	14	17	136	159
	% Denied	**12.7%**	**13.3%**	**24.9%**	**14.3%**	**30.4%**	**7.6%**	**21.1%**

Note: Total also includes 312 applications for which no income data was reported.

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2008 to 2010

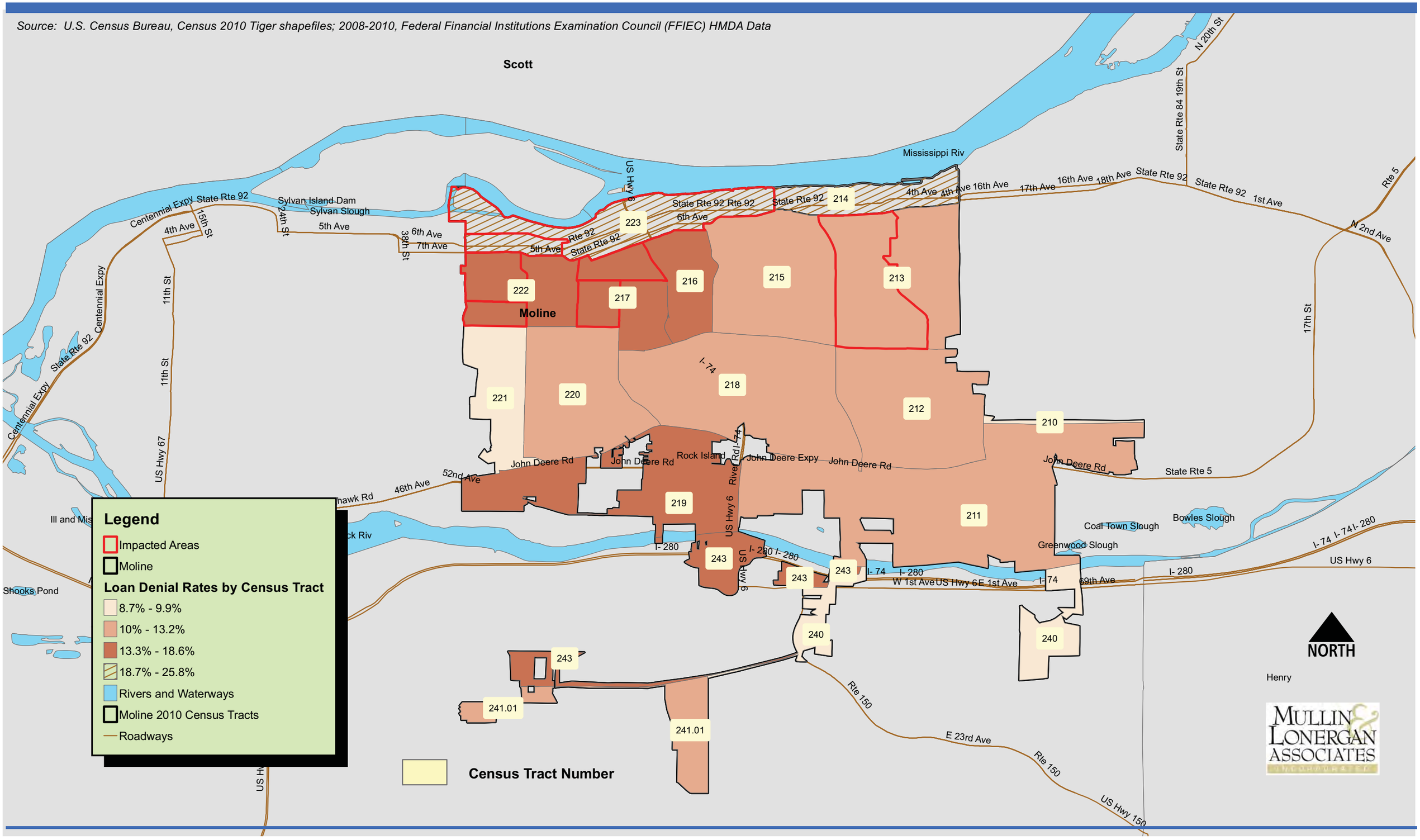
Over the course of the three years studied, upper-income minority households in Moline experienced denial rates that were higher than those of lower-income White households.

Among upper-income Asian, Hispanic, Other Race (primarily Native American), and Black households, mortgage denial rates were 15.5%, 24.1%, 35.7%, and 22.1%, respectively, compared to a denial rate of 11.2% among upper-income Whites. While this fact alone does not imply an impediment to fair housing choice, the pattern is consistent with discrimination.

Denial rates by census tract across Moline are illustrated in Map 5-3. Of the 17 total tracts within the City, two census tracts, 214 and 223, had denial rates of 23.5% and 25.8%, respectively. These census tracts are located in an area of minority and/or LMI concentration.

Map 5-3: Loan Denial Rates by Census Tract, 2008 - 2010, City of Moline, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



vii. High-Cost Lending in Moline

Between 2008 and 2010, there were 6,381 home purchase, refinance, or home improvement loans made for single-family or manufactured units in Moline. Of this total, 5,634 disclosed the borrower's household income and 468 reported high-cost mortgages. Overall, upper-income households, with the exception of Black households, were slightly less likely to have high-cost mortgages than lower-income households.

An analysis of loans in Moline by race and ethnicity reveals that among lower-income minority households, 17.6% of mortgages obtained by Asians, 7.7% of mortgages obtained by Blacks, and 18% of those obtained by Hispanics were high-cost, compared to 8.6% of the mortgages obtained by lower-income White households.

Disparities were also apparent among upper-income households. White households were the least likely to have high-cost mortgages (6.1%). The high-cost mortgage rate for upper-income Black households was 11.1%, the highest of any upper-income group, while Hispanic households experienced a high-cost loan rate of 6.4%. By comparison, the high-cost loan rate for Black upper-income households was almost twice as high as the rate for White households. Details appear in Figure 5-7 and in Map 5-4.

Figure 5-7
High-Cost Loans by Race/Ethnicity and Income in Moline, 2008-2010

		Total	White	Black	Asian	Other	No data	Hispanic*
Lower-Income	Total Originations	2,289	2,102	39	17	10	121	172
	High-Cost	197	181	3	3	1	9	31
	% High-Cost	**8.6%**	**8.6%**	**7.7%**	**17.6%**	**10.0%**	**7.4%**	**18.0%**
Upper-Income	Total Originations	3,345	3,041	54	27	16	207	203
	High-Cost	202	187	6	1	0	8	13
	% High-Cost	**6.0%**	**6.1%**	**11.1%**	**3.7%**	**0.0%**	**3.9%**	**6.4%**
Total	Total Originations	6,381	5,839	102	55	29	356	422
	High-Cost	468	435	9	4	1	19	48
	% High-Cost	**7.3%**	**7.4%**	**8.8%**	**7.3%**	**3.4%**	**5.3%**	**11.4%**

Note: Total also includes 747 loans for which no income data was reported.
* Hispanic ethnicity is counted independently of race.
Source: Federal Financial Institutions Examination Council, 2008 to 2010

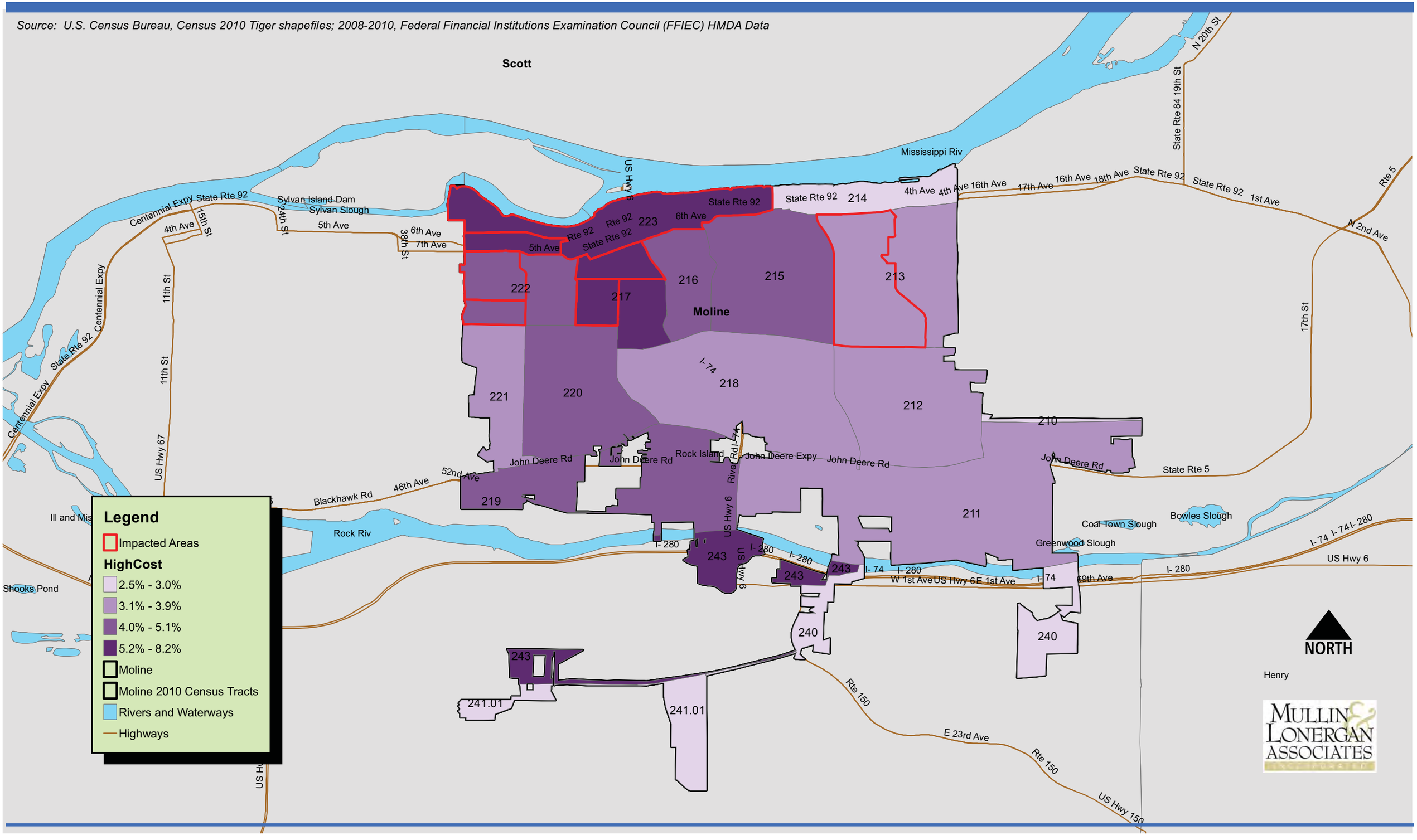
Lower-income Asian and Hispanic households in Moline were more likely to receive high-cost mortgage loans than lower-income White or Black households. More notably, upper-income Black households were more likely to receive high-cost mortgage loans than both lower-income and upper-income White households.

This trend places minority homeowners at greater risk for eviction, foreclosure, and bankruptcy. In addition, the patterns are consistent with discriminatory lending behavior.

The distribution of high-cost loans by census tract across Moline is depicted on Map 5-4. There are eight census tracts (tracts 215, 216, 217, 219, 220, 222, 223 and 243) where high-cost mortgages constitute more than 4.0% of all mortgage loans. Of these eight census tracts, five are Impacted Areas.

Map 5-4: High Cost Loans by Census Tract, 2008 - 2010, City of Moline, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



viii. Annual Trends in Moline

Studying mortgage application data on an annual basis allows insight into the influence of housing market trends on the behavior of applicants and banks. Figure 5-8 illustrates annual change.

Figure 5-8
Mortgage Application Loan Results in Moline, 2008-2010

	2008		2009		2010	
	#	%	#	%	#	%
Total loans						
Applied for	**3,143**	**100.0%**	**4,368**	**100.0%**	**3,909**	**100.0%**
Black	58	1.8%	83	1.9%	60	1.5%
White	2,601	82.8%	3,511	80.4%	3,153	80.7%
Asian	21	0.7%	34	0.8%	43	1.1%
Hispanic*	197	6.3%	275	6.3%	282	7.2%
Other race	16	0.5%	23	0.5%	17	0.4%
No information/NA	447	14.2%	717	16.4%	636	16.3%
Originated	**1,622**	**51.6%**	**2,501**	**57.3%**	**2,258**	**57.8%**
Black	24	41.4%	47	56.6%	31	51.7%
White	1,478	56.8%	2,305	65.7%	2,056	65.2%
Asian	10	47.6%	17	50.0%	28	65.1%
Hispanic*	102	51.8%	165	60.0%	155	55.0%
Other race	4	25.0%	17	73.9%	8	47.1%
No information/NA	106	23.7%	115	16.0%	135	21.2%
Originated - High Cost	**223**	**13.7%**	**174**	**7.0%**	**71**	**3.1%**
Black	5	20.8%	3	6.4%	1	3.2%
White	206	13.9%	161	7.0%	68	3.3%
Asian	2	20.0%	1	5.9%	1	3.6%
Hispanic*	17	16.7%	19	11.5%	12	7.7%
Other race	-	0.0%	1	5.9%	-	0.0%
No information/NA	10	9.4%	8	7.0%	1	0.7%
Denied	**528**	**16.8%**	**447**	**10.2%**	**476**	**12.2%**
Black	20	34.5%	20	24.1%	10	16.7%
White	458	17.6%	378	10.8%	398	12.6%
Asian	3	14.3%	4	11.8%	7	16.3%
Hispanic*	43	21.8%	47	17.1%	69	24.5%
Other race	8	50.0%	4	17.4%	5	29.4%
No information/NA	39	8.7%	41	5.7%	56	8.8%

Note: Data is for home purchase, refinance and improvement loans for owner-occupied one-to-four family and manufactured units. Other application outcomes include approved but not accepted, withdrawn, incomplete or purchase by another institution.

* Hispanic ethnicity is counted independently of race.

Source: Federal Financial Institutions Examination Council, 2008-10

Housing markets across the country have experienced steep declines in sales volume and mortgage applications since 2008 as a result of buyer reticence in an unstable

market. Counter to national trends, the number of applications in Moline rose from 3,143 in 2008 to 3,909 in 2010.

Between 2008 and 2010, the percentage of applications that resulted in loan originations increased, on the whole and across most racial and ethnic groups. The number of loans that were high-cost dropped substantially from 2008 to 2010. This is likely a direct result of increasing statutory control over predatory lending practices. It is also possible that education and outreach related to borrowing has contributed to the decline in high-cost loans. Between 2008 and 2010, the proportion of applications resulting in denials declined from 16.8% to 12.2%. This change also occurred across all minority groups, with the exception of Asians, who experienced an increase.

Between 2008 and 2010, high-cost lending rates in Moline dropped substantially, on the whole and across all racial and ethnic groups.

This is likely a direct result of increased statutory control over predatory lending practices, as well as increasing borrower awareness.

ix. Rock Island Mortgage Applicant Characteristics

Across the city of Rock Island during the last three years, lenders received 5,204 applications for mortgage refinancing, 2,481 applications for home purchase mortgages, and 1,136 applications for home improvement equity loans. Of these, home improvement loans were the most likely to be successful, as 60.6% were originated. Over 8% of home improvement loan applications were withdrawn or left incomplete, and 26% were denied. By comparison, over half (57%) of home purchase loans were originated. Thirty-one percent of home purchase loans were withdrawn or incomplete. Over 8% were denied, the lowest denial rate of all applications. Refinancing loans represent the largest share of all applications, with 59% of the total.

The vast majority of applications involved one- to four-family housing structures, with only 35 applications (0.4%) requesting financing for manufactured units. The denial rate for manufactured homes, 62.9%, was substantially higher than the overall denial rate of 15.2% for one-to-four family units.

The most commonly sought type of financing was conventional loans, a category that represented almost three-quarters of all loan applications. An additional 25.8% of applications were for loans insured by the Federal Housing Administration (FHA), a type of federal assistance that has historically benefited lower-income residents. Smaller percentages of applications were for loans backed by the Department of Veterans Affairs (VA). No loans were reported backed by the Farm Services Administration or Rural Housing Service (FSA/RHS).

The racial composition of loan applicants differs somewhat from the city's general demographic distribution. While 4.8% of all Rock Island households in 2010 were Hispanic, Hispanic households constitute only 4.2% of the loan applications for which racial/ethnic data were reported. Similarly, 18.0% of all households in the city were Black, while only 6.6% of the loan applications for which race was reported were filed by Black households. White households represent a share of applications (77.7%) comparable to their share of all households citywide (78.4%). Asian households represent 0.3% of the city's households and 0.4% of the loan applications for which race was reported. Lower participation in the

market for home mortgages by Black and Hispanic households is likely a reflection of the lower median incomes among those groups.

Grouping all three years of data into the analysis increases the likelihood that differences among groups are statistically significant. This is especially important in view of the data on mortgage application denials, which also suggests differences according to race and ethnicity.

Figure 5-9
Cumulative Summary Report Based on Action Taken Mortgage Data in Rock Island, 2008-2010

	Total Applications*		Originated		Approved Not Accepted		Denied		Withdrawn/ Incomplete	
	#	%	#	%	#	%	#	%	#	%
Loan Purpose										
Home purchase	2,481	28.1%	1,413	57.0%	69	2.8%	208	8.4%	770	31.0%
Refinancing	5,204	59.0%	2,701	51.9%	293	5.6%	852	16.4%	1,270	24.4%
Home improvement	1,136	12.9%	688	60.6%	41	3.6%	300	26.4%	98	8.6%
Loan Type										
Conventional	6,342	71.9%	3,688	58.2%	316	5.0%	1,065	16.8%	1,185	18.7%
FHA	2,278	25.8%	1,009	44.3%	81	3.6%	274	12.0%	884	38.8%
VA	197	2.2%	104	52.8%	5	2.5%	20	10.2%	68	34.5%
FHS/RHS	4	0.0%	1	25.0%	1	25.0%	1	25.0%	1	25.0%
Property Type										
One to four-family unit	8,756	99.3%	4,771	54.5%	402	4.6%	1,334	15.2%	2,132	24.3%
Manufactured housing unit	35	0.4%	7	20.0%	1	2.9%	22	62.9%	4	11.4%
Applicant Race										
Native American	26	0.3%	13	50.0%	2	7.7%	8	30.8%	2	7.7%
Asian	36	0.4%	25	69.4%	0	0.0%	8	22.2%	3	8.3%
Black	581	6.6%	228	39.2%	24	4.1%	197	33.9%	117	20.1%
Hawaiian	8	0.1%	4	50.0%	1	12.5%	2	25.0%	1	12.5%
White	6,858	77.7%	4,264	62.2%	348	5.1%	980	14.3%	1,185	17.3%
No information	507	5.7%	195	38.5%	22	4.3%	160	31.6%	109	21.5%
Not applicable	805	9.1%	73	9.1%	6	0.7%	5	0.6%	721	89.6%
Hispanic**	372	4.2%	202	54.3%	22	5.9%	78	21.0%	65	17.5%
Total	**8,821**	**100.0%**	**4,802**	**54.4%**	**403**	**4.6%**	**1,360**	**15.4%**	**2,138**	**24.2%**

Source: Federal Financial Institutions Examination Council, 2008 to 2010

Note: Percentages in the Originated, Approved Not Accepted, Denied, and Withdrawn/Incomplete categories are calculated for each line item with the corresponding Total Applications figures. Percentages in the Total Applications categories are calculated from their respective total

* Total applications also include loans purchased by another institution.

** Hispanic ethnicity is counted independently of race.

x. Rock Island Mortgage Application Denials

During the years 2008 through 2010, a total of 1,360 mortgage loan applications were denied across Rock Island. The overall cumulative denial rate was 15.4%, with denials by race and ethnicity ranging from 14.3% for White households to 33.9% for Black households. In reporting denials, lenders are required to list at least one primary reason for denial and may list up to two secondary reasons. A substantial proportion of denials did not list a reason. The primary basis for the rejection of 1,260 applications, or 90% of all denials, was left blank. This was far more prevalent in the denials for Black households, almost all of which (93%) were rejected without a reported reason. Other common reasons given for denial include lack of collateral, debt-to-income ratio, and credit history. Due to the lack of information, it is impossible to analyze the reasons for mortgage loan application

denials. Banks and other lending institutions should be required to provide a feasible reason for denial to allow for better credit counseling and home ownership preparation.

Mortgage loan denial rates among racial and ethnic minority applicants in Rock Island were higher than the denial rate for White applicants between 2008 and 2010.

Rejections for Black, Hispanic, and Other Race applicants were less likely to be accompanied by a reason for denial. Overall, the reasons for denial were limited, particularly among Black applicants. Nearly all mortgage loan application denials among Black households did not list a reason for denial.

For this analysis, lower-income households include those with incomes between 0%-80% of MFI, while upper-income households include households with incomes above 80% MFI. Applications made by lower-income households accounted for 38.4% of all denials between 2008 and 2010, while they accounted for 38.8% of total applications for those three years.

Figure 5-10 distributes the denials by income level among racial and ethnic groups. Among lower-income households, denial rates were generally higher for minorities. While the overall lower-income denial rate was 15.6%, the denial rates for lower-income households of Other Race (consisting primarily of Native Americans), Hispanics, and Blacks were 22.2%, 12.7%, and 28.2%, respectively. Asian households had the highest denial rate, at 55.6%, but due to the small number of total applications and denials it is difficult to determine a clear pattern

While denial rates were generally lower for upper-income households, differences persisted across racial and ethnic groups. The overall upper-income denial rate was 14.5%, compared to 8.7%, 30.2%, 32%, and 37.3% for upper-income Asian, Hispanic, Other Race, and Black households, respectively. Lower-income White households were less likely to experience denial than any of the upper-income Hispanic, Other race, and Black households. This pattern is consistent with discrimination.

Figure 5-10
Mortgage Denials by Household Race/Ethnicity in Rock Island, 2008-2010

		Total	White	Black	Asian	Other	No data	Hispanic*
Lower-Income	Total Applications	3,395	2,774	312	9	9	291	213
	Denials	529	369	88	5	2	65	27
	% Denied	**15.6%**	**13.3%**	**28.2%**	**55.6%**	**22.2%**	**22.3%**	**12.7%**
Upper-Income	Total Applications	4,391	3,752	236	23	25	355	149
	Denials	637	465	88	2	8	74	45
	% Denied	**14.5%**	**12.4%**	**37.3%**	**8.7%**	**32.0%**	**20.8%**	**30.2%**
Total	Total Applications	8,821	6,858	581	36	34	1,312	372
	Denials	1,360	980	197	8	10	165	78
	% Denied	**15.4%**	**14.3%**	**33.9%**	**22.2%**	**29.4%**	**12.6%**	**21.0%**

Note: Total also includes 531 applications for which no income data was reported.
* Hispanic ethnicity is counted independently of race.
Source: Federal Financial Institutions Examination Council, 2008 to 2010

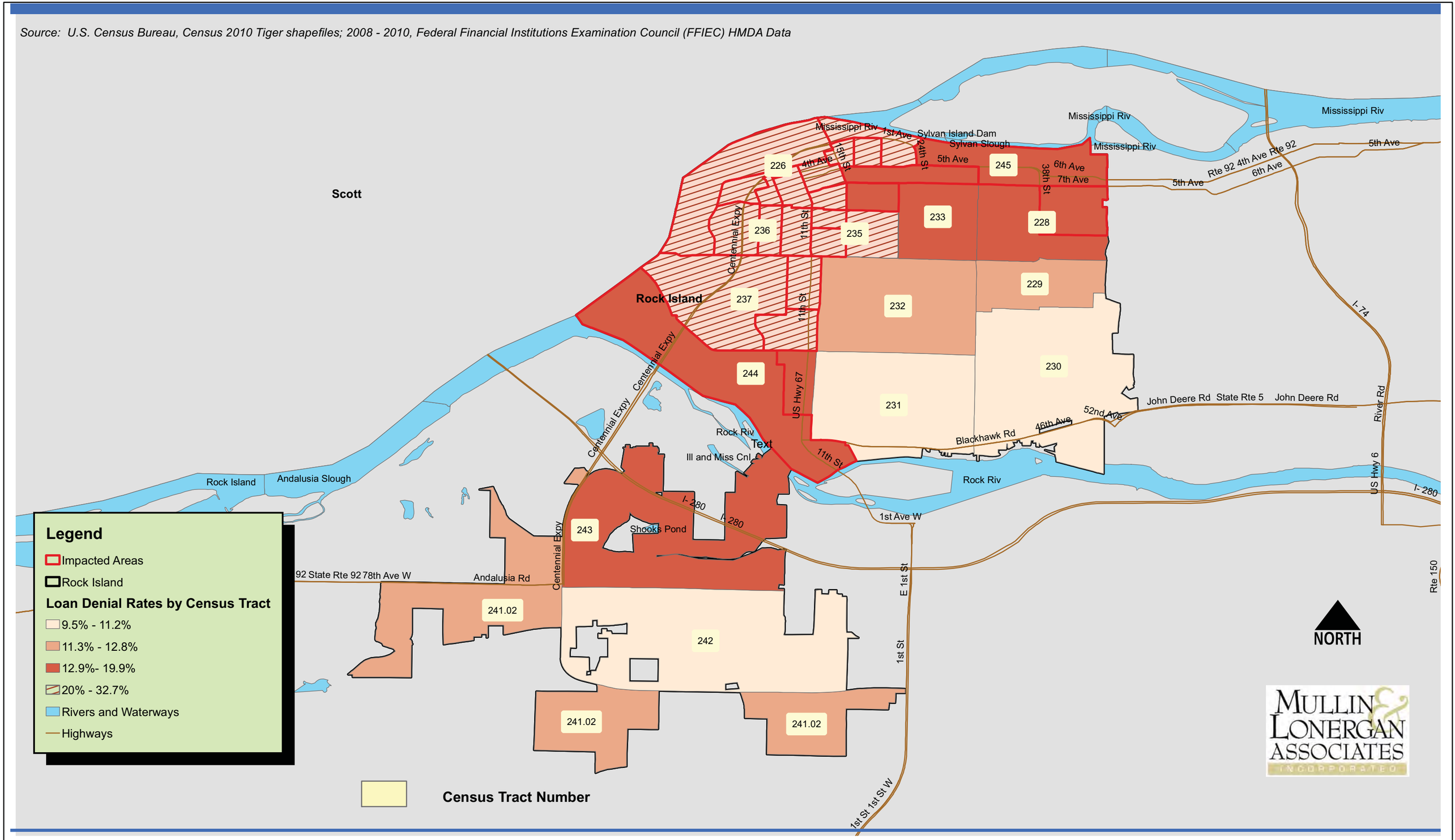
Over the course of the three years studied, upper-income minority households in Rock Island experienced denial rates that were higher than those of lower-income White households.

Among upper-income Hispanic, Other Race (primarily Native American), and Black households, mortgage denial rates were 30.2%, 32%, and 37.3%, respectively, compared to a denial rate of 12.4% among upper-income Whites. While this fact alone does not imply an impediment to fair housing choice, the pattern is consistent with discrimination.

Denial rates by census tract across Rock Island are illustrated in Map 5-5. Of the 15 total tracts within the City, three census tracts had denial rates over 30%. These include census tracts 237 (32.7%), 236 (32.5%), 226 (32.4%). These census tracts are located in an area of minority and/or LMI concentration.

Map 5-5: Loan Denial Rates by Census Tract, 2000 - 2010: City of Rock Island, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



xi. High-Cost Lending in Rock Island

Between 2008 and 2010, there were 4,802 home purchase, refinance, or home improvement loans made for single-family or manufactured units in Rock Island. Of this total, 4,271 disclosed the borrower's household income and 476 reported high-cost mortgages. Overall, upper-income minority households were more likely to have high-cost mortgages than lower-income households.

An analysis of loans in Rock Island by race and ethnicity reveals that among lower-income minority households, 14.3% of mortgages obtained by Blacks and 15.6% of those obtained by Hispanics were high-cost, compared to 10.2% of the mortgages obtained by lower-income White households. The small number of Asian and Other households makes it difficult to make a clear analysis.

Disparities were also apparent among upper-income households. White households were the least likely to have high-cost mortgages (9.9%). The high-cost mortgage rate for upper-income Black households was 22%, the highest of any upper-income group, while Hispanic households experienced a high-cost loan rate of 16.3%. By comparison, the high-cost loan rate for Black upper-income households was more than twice as high as the rate for White households. Details appear in Figure 5-11.

Figure 5-11
High-Cost Home Purchase Loans by Race/Ethnicity and Income in Rock Island, 2008-2010

		Total	White	Black	Asian	Other	No data	Hispanic*
Lower-Income	Total Originations	1,857	1,651	84	6	11	105	96
	High-Cost	193	169	12	0	2	10	15
	% High-Cost	**10.4%**	**10.2%**	**14.3%**	**0.0%**	**18.2%**	**9.5%**	**15.6%**
Upper-Income	Total Originations	2,414	2,132	118	12	5	147	86
	High-Cost	243	212	26	1	0	4	14
	% High-Cost	**10.1%**	**9.9%**	**22.0%**	**8.3%**	**0.0%**	**2.7%**	**16.3%**
Total	Total Originations	4,802	4,264	228	25	17	268	202
	High-Cost	476	414	42	1	2	17	32
	% High-Cost	**9.9%**	**9.7%**	**18.4%**	**4.0%**	**11.8%**	**6.3%**	**15.8%**

Note: Total also includes 1,035 loans for which no income data was reported.

* Hispanic ethnicity is counted independently of race.

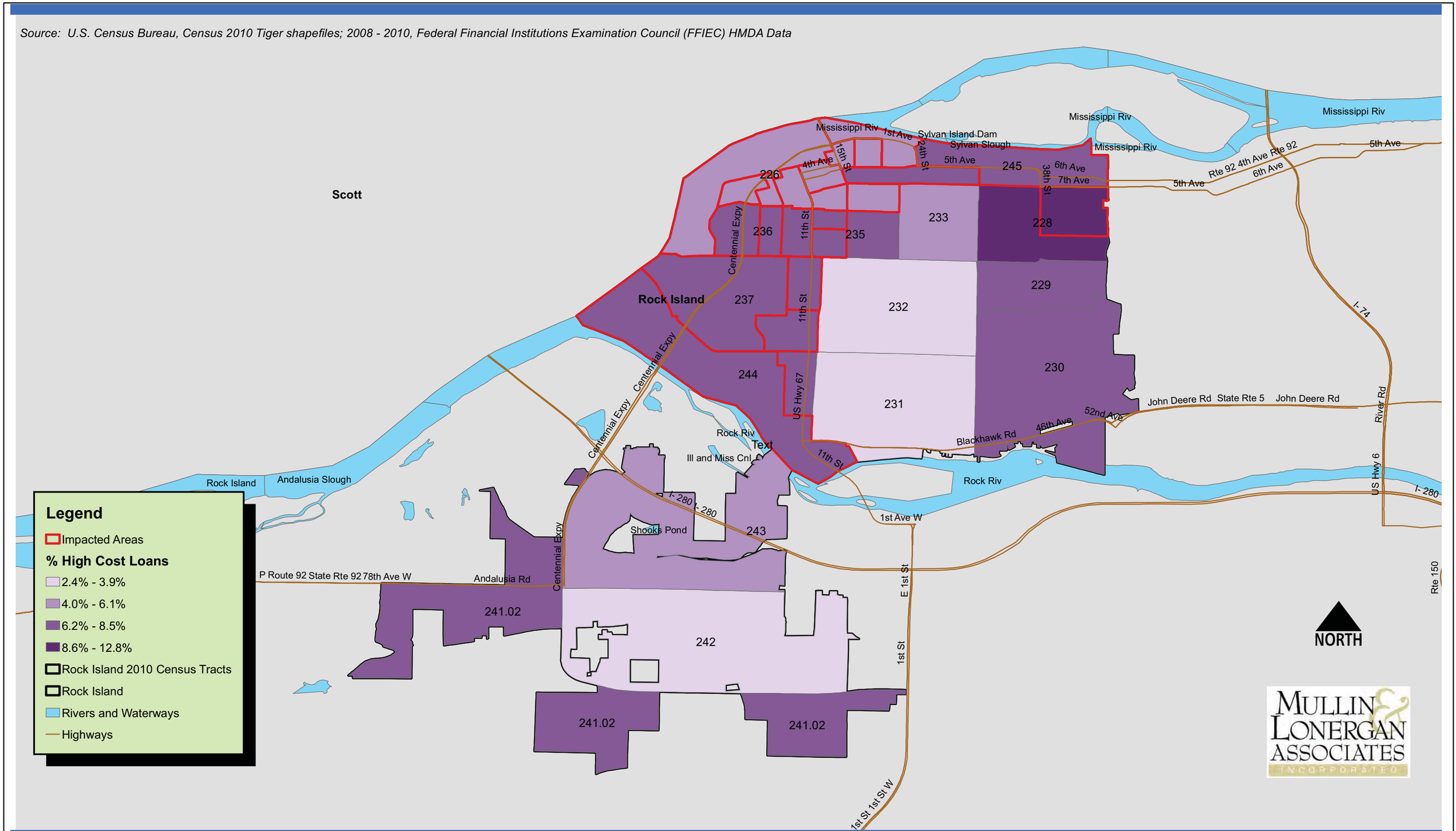
Source: Federal Financial Institutions Examination Council, 2008 to 2010

Lower-income Hispanic and Black households in Rock Island are more likely to receive high-cost mortgage loans than lower-income White households. More notably, however, upper-income Black households are more likely to receive high-cost mortgage loans than lower-income White households.

The distribution of high-cost loans by census tract across Rock Island is depicted on Map 5-6. There are nine census tracts (tracts 228, 229, 230, 235, 236, 237, 241.02, 244 and 245) where high-cost mortgages constitute more than 6.2% of all mortgage loans, including one tract where at least one in every 10 loans is high-cost. As Map 5-6 shows, most of the high-cost loan tracts are in Impacted Areas.

Map 5-6: High Cost Loans by Census Tract, 2000 - 2010: City of Rock Island, Illinois

Analysis of Impediments to Fair Housing Choice, 2012



xii. Annual Trends in Rock Island

Studying mortgage application data on an annual basis allows insight into the influence of housing market trends on the behavior of applicants and banks. Figure 5-12 illustrates annual change.

Figure 5-12
Mortgage Application Loan Results in Rock Island, 2008-2010

	2008		2009		2010	
	#	%	#	%	#	%
Total loans						
Applied for	**2,869**	**100.0%**	**3,221**	**100.0%**	**2,731**	**100.0%**
Black	249	8.7%	180	5.6%	152	5.6%
White	2,160	75.3%	2,588	80.3%	2,110	77.3%
Asian	14	0.5%	10	0.3%	12	0.4%
Hispanic*	135	4.7%	119	3.7%	118	4.3%
Other race	14	0.5%	11	0.3%	9	0.3%
No information/NA	432	15.1%	432	13.4%	448	16.4%
Originated	**1,436**	**50.1%**	**1,836**	**57.0%**	**1,528**	**56.0%**
Black	78	31.3%	72	40.0%	78	51.3%
White	1,238	57.3%	1,666	64.4%	1,360	64.5%
Asian	3	21.4%	5	50.0%	8	66.7%
Hispanic*	64	47.4%	70	58.8%	68	57.6%
Other race	12	85.7%	6	54.5%	6	66.7%
No information/NA	105	24.3%	87	20.1%	76	17.0%
Originated - High Cost	**250**	**17.4%**	**166**	**9.0%**	**60**	**3.9%**
Black	19	24.4%	12	16.7%	11	14.1%
White	217	17.5%	149	8.9%	48	3.5%
Asian	-	0.0%	1	20.0%	-	0.0%
Hispanic*	16	25.0%	8	11.4%	8	11.8%
Other race	2	16.7%	-	0.0%	-	0.0%
No information/NA	12	11.4%	4	4.6%	1	1.3%
Denied	**583**	**20.3%**	**415**	**12.9%**	**362**	**13.3%**
Black	103	41.4%	57	31.7%	37	24.3%
White	407	18.8%	312	12.1%	261	12.4%
Asian	4	28.6%	1	10.0%	3	25.0%
Hispanic*	37	27.4%	20	16.8%	21	17.8%
Other race	6	42.9%	3	27.3%	1	11.1%
No information/NA	63	14.6%	42	9.7%	60	13.4%

Note: Data is for home purchase, refinance and improvement loans for owner-occupied one-to-four family and manufactured units. Other application outcomes include approved but not accepted, withdrawn, incomplete or purchase by another institution.
* Hispanic ethnicity is counted independently of race.
Source: Federal Financial Institutions Examination Council, 2008-10

Housing markets across the country have experienced steep declines in sales volume and mortgage applications since 2008 as a result of buyer reticence in an unstable market. Similar to national trends, the number of applications in Rock Island declined slightly from 2,869 in 2008 to 2,731 in 2010.

Between 2008 and 2010, the percentage of applications that resulted in loan originations increased slightly, on the whole and for Asian and Hispanic households in particular. The number of loans that were high-cost dropped substantially from 2008 to 2010. This is

likely a direct result of increasing statutory control over predatory lending practices. It is also possible that education and outreach related to borrowing have contributed to the decline in high-cost loans. Between 2008 and 2010, the proportion of applications resulting in denials declined from 20.3% to 13.3%. This change also occurred across all minority groups.

Between 2008 and 2010, high-cost lending rates dropped substantially in Rock Island, on the whole and across all racial and ethnic groups.

This is likely a direct result of increased statutory control over predatory lending practices, as well as increasing borrower awareness.

B. Real Estate Practices

Davenport, Moline and Rock Island are served by the Quad City Area REALTORS® Association (QCARA), a nonprofit trade organization with about 715 members. Most area REALTORS® are dual-licensed in both Illinois and Iowa. QCARA functions as the local arm of the National Association of REALTORS®.

Every two years in Illinois and every three years in Iowa, REALTORS® must take a 3-4 hour course in fair housing education. Illinois REALTORS® must pass a test on the course, but Iowa REALTORS® only need to prove that they attended the course. QCARA has quarterly meetings, and fair housing speakers can make presentations at these meetings.

Although the new QCARA Board of Directors Chairwoman is Black, only about a dozen of QCARA's 715 members are minorities. At its summer 2011 meeting, the QCARA Board of Directors discussed the need to solicit more minority members.

When someone files a complaint with QCARA about a member REALTOR®, the QCARA refers the case to the QCARA's grievance committee. The grievance committee reviews the case and reports its findings to the QCARA's professional standards committee, which then determines whether any action is necessary.

Several stakeholders interviewed during the preparation of the AI identified a need for real estate testing for race and disability, particularly for rental units. Testing among real estate agents for race appears to be needed as well. Mortgage lending testing may also be warranted, however, this type of testing (as well as testing for homeowners insurance) is very expensive and time-consuming.)

Attendees at the public meeting held during the preparation of the AI echoed the opinions of the stakeholders that some real estate agents and lending institutions do engage in practices that violate the Fair Housing Act. These practices include real estate steering to or from certain areas of the cities; mortgage lending and interest rate discrepancies; and insurance cancellations, denials or exclusions. Often, these practices are subtle and would be hard to prove. The three entitlement cities would need to conduct fair housing testing to try to reveal such practices.

Testing may be required to determine if some real estate agents and lending institutions are engaging in discriminatory practices that violate the federal Fair Housing Act or state or local fair housing laws. There is a continuing need for real estate testing for race and disability (particularly for rental units), testing

among real estate agents for race, mortgage lending testing, and homeowners insurance testing.

C. Newspaper Advertising

Under federal law, no advertising with respect to the sale or rental of a dwelling may indicate any preference, limitation, or discrimination because of race, color, religion, sex, handicap, familial status or national origin. In addition, Illinois law extends protection to persons based on age, marital status, military status, order of protection status, and sexual orientation. Iowa law extends protection from retaliation against anyone for having filed a charge, complained about discrimination or participated in an investigation or court proceedings involving discrimination. In the City of Davenport, protected classes include age, creed, marital status, gender identity or sexual orientation.

Under federal law, publishers and advertisers are liable for making, printing, or publishing advertisements that violate the Fair Housing Act on its face. Thus, they should not publish or cause to be published an advertisement that expresses a preference, limitation or discrimination on the basis of race, color, religion, sex, handicap, familial status, or national origin. The law, as found in the Fair Housing Amendments Act of 1988, describes the use of words, photographs, symbols or other approaches that are considered discriminatory. In the Quad Cities area, publishers and advertisers must extend publishing and advertising prohibitions to the state and local protected classes listed in the paragraph above.

The real estate sections of the Sunday, February 26, 2012 editions of The Dispatch & The Rock Island Argus (the main paper on the Illinois side of the Mississippi River) and the Quad-City Times (the main paper on the Iowa side of the river) were reviewed to identify impediments to housing choice within the published advertisements for houses and other dwelling units offered for sale or for rent. Also reviewed were the February 23, 2012 edition of the Thrifty Nickel/The Post, a free newspaper published in the Quad Cities area, and the Apartment Finder, a quarterly magazine that publishes advertisements for apartments in the Quad Cities area and other cities in Iowa and Illinois.

A search of the advertisements showed that a few – but not many – of the advertisers in the Quad-City Times, The Dispatch & The Rock Island Argus, and the Thrifty Nickel/The Post showed the Equal Housing Opportunity or Equal Housing Lending logo. Several major real estate firms placed the HUD fair housing logo in their banner ads. However, in many cases, large display advertisements (including full page advertisements) did not include the logo. Some of the logos that were published were so small that the caption underneath the logo was unreadable, so if potential buyers or renters were to see the logo, they would not be able to ascertain the meaning without prior knowledge of the logo and the intent behind it. By contrast, most—but not all—advertisements in the Apartment Finder did include the logo.

The publisher's notice and the newspaper's policies on accepting and printing real estate ads in accordance with federal, state or local fair housing laws were included only in the Quad-City Times and the Apartment Finder. The Quad-City Times notice listed some—but not all—of the classes protected by law in Iowa, Illinois, and the City of Davenport. The notice in the Apartment Finder listed only the federally protected classes.

In the hundreds of for-sale and rental ads reviewed, there were no instances of blatantly discriminatory language. However, some ads contained questionable language. For example, in the Quad-City Times, there were ads that included phrases like "great starter or retirement home". Such wording may discourage families with children from pursuing action on the ad. Other ads

contained phrases like “great for a growing family”, “ready for your family”, and “house needs a loving family”. This type of wording may discourage singles or people without children from following up on the ad. The Dispatch & The Rock Island Argus also published ads for starter homes, and ads that included phrases like “fenced yard for the kids and pets” and “looking for room for the family?”.

The rule of thumb when advertising real estate for rent or sale is to describe the property, not the people who may want to live there. Any phrase that suggests a preference for a specific type of tenant is questionable.

The aforementioned advertisements seem to indicate that the systems for screening ads before publication at local newspapers need improvement related to potential housing discrimination in real estate advertisements. Also, all newspapers should publish notices stating their policies on accepting and printing real estate ads in accordance with federal, state and local fair housing laws. These notices should list all applicable federal, state and local protected classes.

Preferences for particular household types were detected among the various real estate advertising outlets reviewed for the AI, suggesting that local newspapers could improve their screening processes related to potential housing discrimination. In addition, The Dispatch and Rock Island Argus did not include a publisher’s policy on real estate advertising complying with federal and state fair housing laws

The questionable language in some ads suggests that local newspapers are not adequately screening for potentially discriminatory advertising language.

6. Evaluation of Current Fair Housing Profile

A. Fair Housing Policies, Fair Housing Activities and Actions Taken since the Previous AI

Davenport, Moline and Rock Island's last Analysis of Impediments to Fair Housing Choice (AI) was completed in 2006. Per HUD requirements, the three cities complete an AI every five years, and they report progress in fair housing initiatives annually in their Consolidated Annual Performance Evaluation Reports (CAPER). The following impediments were identified in the 2006 AI:

- Predatory lending practices with limited local enforcement of existing laws and resources
- Income disparities among racial groups
- Lack of coordinated public transportation in the Quad Cities region
- Characteristics of redlining in certain areas
- Limited availability of affordable housing
- Limited accessible housing units (Davenport and Rock Island)
- Not in my backyard (NIMBY) issues (Davenport and Moline)
- Lack of developable land (Moline and Rock Island)
- Aging housing containing lead-based paint (Moline and Rock Island)
- Lack of local fair housing law and education efforts (Moline and Rock Island)
- Regulatory issues such as zoning and historic compatibility compliance (Rock Island)

As reported in their CAPERs, the three cities have made the following progress in affirmatively furthering fair housing since the 2006 AI

i. Davenport

The city of Davenport works closely with the Davenport Civil Rights Commission (DCRC) to address impediments to fair housing.

Identified Impediment – Predatory Lending Practices with Limited Local Enforcement of Existing Laws and Resources

- The City of Davenport purchased a software package which it uses to analyze possible predatory lending in Davenport. DCRC concluded its investigation of two complaints of predatory lending.
- DCRC staff regularly attends annual training sponsored by the Regional Executive Council on Civil Rights addressing investigate techniques, predatory lending practices, and other housing issues.
- DCRC staff created a home buying game that has been used at large community events to educate participants about key concepts of buying a home, and focused on obtaining non-predatory mortgage financing. Distributed information about civil rights and reached approximately 300 persons at the 2011 Juneteeth Celebration.
- DCRC staff presented training to more than one hundred real estate agents regarding predatory lending and steering.

- DCRC and Housing Rehabilitation staff attended trainings by the National Committee Reinvestment Coalition (NCRC) regarding obtaining and interpreting Community Reinvestment Act reports, and practical relief for victims of predatory lending.
- DCRC staff actively participates in state legislative lobbying efforts to pass legislation limiting predatory lending in partnership with other local and the state civil rights commissions.
- DCRC staff received training from the NCRC on the utilization of HMDA data to use in determining where predatory lending practices are occurring.
- DCRC settled a complaint based on predatory lending practices that involve the modification of an adjustable high-interest loan.
- DCRC has partnered and continues to partner with lending institutions in a variety of ways to promote community education concerning predatory lending practices and housing discrimination.

Identified Impediment – Income Disparity among Racial Groups

- The Office of Economic Development has implemented a small business loan program that can help low and moderate income individuals of racial and ethnic background start or expand their businesses. Several people from minority groups have taken advantage of this loan program.
- DCRC is partnering with credit unions and other lending institutions for the purpose of developing a financial literacy program to provide to students attending the Davenport Community School District.
- DCRC continues to partner with the U.S. Department of Justice to bring the Community Relations Service to Davenport to assist youth groups to improve relationships among students, staff, parents, and community groups. DCRC believes that poor relationships and communications may be barriers to minorities staying in school.
- DCRC is sponsoring Coffee Talks with different racial and ethnic groups in which groups have focused on the importance of education for youth to improve their economic condition.

Identified Impediment – Characteristics of Redlining

- DCRC concluded its investigation of two complaints of predatory lending, one of which involved allegations of redlining.
- The city of Davenport maintains a license agreement to utilize software called Lending Patterns to analyze possible discriminatory lending and redlining in Davenport.
- DCRC staff presented training to more than one hundred real estate agents regarding redlining, and also presents fair housing information to community groups and lenders.
- DCRC partners with John Marshall Law School in addressing redlining issues.
- DCRC staff regularly presents fair housing information including issues of predatory lending and redlining at various GenAge Cafes, which are senior lunch sites.
- DCRC is planning to send staff members to Predatory Lending Training with the National Fair Housing Training Academy.
- The city of Davenport will encourage prime lenders to locate in the central city and limit further concentration of sub-prime lenders in the central city.

Identified Impediment – Availability of Affordable Housing

- DCRC is an enforcement agency as well as a conduit to provide education in the community. Similar to the success DCRC has had in furthering fair housing through educating the community, DCRC's enforcement of fair housing laws has increased the number of housing units available on a non-discriminatory basis to low income persons.
- DCRC has partnered in the past and continues to partner with the Quad Cities Area REALTOR® Association to combat housing discrimination and predatory lending by providing trainings and being a resource for real estate agents when issues arise.
- DCRC educated approximately 185 landlords and management staff about fair housing law to facilitate availability of housing to all economic classes.
- DCRC has partnered in the past with the John Marshall Law School, Quad Cities area REALTORS®, and Iowa Finance Authority to discuss improving the availability of affordable housing in our community.
- DCRC provided guidance to the city regarding a new owner-occupied rehabilitation program and its likely impact upon low income persons.
- DCRC provided information on the jurisdiction of DCRC and how to recognize discrimination to over 2,000 persons at the city of Davenport's Parks and Recreation event for families.
- The city of Davenport provides CDBG and HOME funds to affordable housing activities that increase the number of affordable housing units within the city or assist low- to moderate-income homeowners.

Identified Impediment – Limited Accessible Housing Units

- DCRC continues to work with the Community Planning and Economic Development department to make city-owned assisted housing units accessible.
- DCRC continues to work with multifamily housing complexes in Davenport which have had accessibility surveys to ensure full compliance with the accessibility requirements of the Davenport Civil Rights Ordinance, which is substantially equivalent to the federal Fair Housing Act.
- DCRC staff continues to be a resource for the city of Davenport and local builders and developers regarding compliance with applicable residential housing accessibility requirements, as new projects are built and as existing projects are brought into compliance. DCRC met with owners and developers to educate about accessibility regarding 54 new housing units. DCRC is additionally a resource for the city regarding housing law and for residents who have questions about requirements and/or materials for accessibility. The city will use CDBG funds when possible to collaborate with the DCRC to provide training for builders, contractors and architects on the accessibility requirements of the Fair Housing Act.
- DCRC continues to participate in the city's Section 504 Committee, involving all city departments, to increase services and opportunities for persons with disabilities in Davenport. DCRC will also facilitate resolution of accessibility complaints regarding the Citibus system.
- DCRC continues to assist the Public Works Department in reviewing building plans for alterations of public accommodations and housing, as well as to work with businesses

which have remodeled to ensure compliance with ADA requirements, to provide a more welcoming community for our residents with disabilities.

- DCRC provided training on Section 504 to recipients of federal CDBG funding, regarding providing equal opportunities for persons with disabilities.
- DCRC co-organized ADA Celebration at Modern Woodmen Ballpark to highlight accomplishments of persons with disabilities, and provide awareness of remedies and services available to persons with disabilities.
- DCRC educated approximately 185 landlords and management staff about fair housing law to ensure the provisions of reasonable accommodations and reasonable modifications for persons with disabilities.
- DCRC staff received training by the ADA Project and attended the ADA Symposium for comprehensive training on new ADA regulations.
- DCRC increased the number of distribution sites for its Accessibility Always brochure.
- DCRC educated the Housing Cluster, a bi-state consortium of for-profit and not-for-profit groups which build, remodel and improve area housing with regard to the accessibility requirements under the Davenport Civil Rights Ordinance and the federal Fair Housing Act.

Identified Impediment – Not in My Backyard (NIMBY) Issues

- DCRC partnered with the Quad City Area REALTOR® Association to present a two-hour continuing education training for credit to REALTORS®.
- DCRC facilitated the development of the Davenport Civil Rights History Project culminating in a multimedia museum exhibit and a walking tour which opened in the spring of 2011, featuring the civil rights history in Davenport between 1948 and 1974. A brochure was also produced and distributed widely to publicize the walking tour and provide an informational map of the tour. Staff also gave presentations to GenAge Cafés about the Walking Tour.
- DCRC sponsored Coffee Talks with different racial and ethnic groups in which groups focused on immigration issues and disability etiquette.
- DCRC performed diversity training to break down racial and ethnic stereotypes.
- DCRC distributed civil rights information at Quad Cities Pride Fest and had a booth at the event to break down stereotypes about gay, lesbian, bisexual and transgender persons.
- DCRC partnered with Sister Cities and the Area Education Agency in planning a Unity Fest to showcase the diversity of our community, as well as break down cultural stereotypes. The Unity Fest included multicultural information booths, entertainment and food.
- DCRC staff participated in finalizing information to be included in the Multicultural Directory for the community.
- DCRC staff presented information to attendees at senior lunch sites about the Coexistence Art Exhibit that took place in August through September 2007. DCRC, along with other organizations, sponsored the Quad Cities Multicultural Festival in conjunction with the Coexistence Art Exhibit that took place in August through September 2007.

- DCRC staff met with the Progressive Action for Common Good group to host another Hands Across the Table event in 2008.
- DCRC participated in St. Ambrose University's March 2009 and March 2010 Diversity Fest to showcase the diversity of our community, as well as break down cultural stereotypes. The diversity Fest includes multicultural information booths, entertainment, and food, and DCRC will participate in the Fest in the future.
- DCRC partnered with the Quad Cities REALTOR® Association to hold Fair Housing Month poster contests to emphasize the value of fair housing and reaching out to neighbors.
- The City of Davenport's Neighborhood Services Specialist serves as a liaison between neighborhood groups and the City to enhance communication of projects and developments with neighborhoods.

Identified Impediment – Coordinated Public Transportation in the Quad Cities Region

- The city of Davenport funds River Bend Transit's Job Access Reverse Commute (JARC) program. JARC provides door-to-door transit for low- to moderate-income individuals who are working, and their children who are attending school. JARC operates during hours that regular public transit is not available.
- The city of Davenport's city-wide long-range transportation master plan, Davenport in Motion, will ensure that Davenport residents have safe and convenient options in transit through improved bus service, a downtown-central city circulator, and an extensive on-street bicycler network.

ii. Moline

Identified Impediment – Predatory Lending Practices with Limited Local Enforcement of Existing Laws and Resources

- Provided housing seminars to address predatory lending practices, mortgage financing education, affordable housing programs and sustainable housing rehab assistance.
- Trained city staff on the provisions of the Illinois Predatory Lending Law.
- Coordinated with local non-profit organizations to provide homeowner education services and credit counseling for the Homebuyer Program.

Identified Impediment – Income Disparity among Racial Groups

- Partnered with neighboring cities to apply for a DollarWi$e grant to fund a financial education coordinator.

Identified Impediment – Lack of Coordinated Public Transportation in the Quad Cities Region

- Applied for a HUD Sustainable Communities Initiative grant to create an alternative transportation network to link people, jobs and housing.

Identified Impediment – Characteristics of Redlining

- No action taken.

Identified Impediment – Availability of Affordable Housing

- Supported affordable housing developments for low-to-moderate income families and new affordable housing construction projects.
- Assisted Gorman Development with development agreement and land purchase for the construction of Enterprise Lofts---a live/work development for low-to-moderate income residents.
- Provided information regarding housing opportunities through printed material; and the city's public access channel.
- Maintains a waiting list for qualified applicants for all programs administered through the city Planning Department in order to keep the funding flowing annually.
- Assisted about 50 low-to-moderate income families annually via the Community Housing Services Program rehabilitation program.
- Rehabilitated two units through the Small Rental Property Program.
- Provided down payment assistance and closing cost assistance to seven homebuyers via the Homebuyer Program.
- Updated its zoning ordinance to include mixed-use planning and mixed-use development.

Identified Impediment – Not in My Backyard (NIMBY) Issues

- Worked with the Illinois Housing Development Authority, American Opportunities for Housing and Moline residents of Orchard Hills (a single family residential subdivision) to address misperceptions about affordable housing and low-to-moderate income housing developments.

Identified Impediment – Lack of Developable Land

- Annexed additional developable land into the city limits in order to provide more housing (single family and multi-family) as well as business and employment opportunities.
- Assisted 125 families through the Lead Hazard Control Program.

Identified Impediment – Lack of Local Fair Housing Law and Education Efforts

- Trained city staff on the provisions of the Illinois Predatory Lending Law.
- Provided CDBG funding annually for public service organizations.

Identified Impediment – Aging Housing Stock Containing Lead-Based Paint

- Hired a Neighborhood Improvement Officer who is responsible for code enforcement throughout the city.
- Maintains a waiting list for qualified applicants for all programs administered through the city Planning Department in order to keep the funding flowing annually.
- Partnered with the city of Rock Island, Project NOW, the Rock Island Economic Growth Corporation and the Rock Island County Health Department to receive a $1.9 million lead hazard control grant.
- Allocated CDBG funding to address complaints received through the Code Enforcement and Neighborhood Abatement Programs.
- Completed 210 inspections and responded to 1,759 complaints through the Code Enforcement Program.

- Continues to partner with the Rock Island County Health Department to provide community education and outreach programs regarding lead hazards.

iii. Rock Island

Identified Impediment – Predatory Lending Practices with Limited Local Enforcement of Existing Laws and Resources

- During 2006, the Quad Cities DollarWi$e Program was spearheaded. QC DollarWi$e is now a growing 30 member consortium of local governments, financial institutions, community-based agencies, and educational institutions working to promote financial education within the Quad Cities.
- During 2006, seventeen agency staff were trained in the "All My Money" curriculum.
- The city of Rock Island received a $15,000 grant from the U.S. Conference of Mayors to fund a part-time Financial Education Coordinator.
- During 2009, QC DollarWi$e launched a program on youth financial literacy; developed a six-week curriculum to bring financial education to the workplace; sponsored a workshop on foreclosures; and worked to promote savings and asset building in the community.

Identified Impediment – Lack of Coordinated Public Transportation in the Quad Cities Region

- No further steps taken.

Identified Impediment – Income Disparity among Racial Groups

- During 2009 and 2010, Neighborhood Partners' Knowledge Through Neighbors Task Force offered Dave Ramsey's 12-week Financial Peace University to empower and give hope to everyone from the financially secure to the financially distressed.

Identified Impediment – Characteristics of Redlining

- The New Old Chicago Initiative was undertaken in 2006 to enhance private investment and to revitalize the neighborhood area.
- Local banks are considering special lending products in the Old Chicago Neighborhood.
- Project NOW and GROWTH Corp received local funding to provide foreclosure prevention assistance and counseling.

Identified Impediment – Availability of Affordable Housing

- The partnership of Rebuilding Together, Youth Build, and The City of Rock Island renovated five homes adjacent to Habitat Park.
- City of Rock Island donated land to Habitat for Humanity to build seven affordable new homes. All seven have been built and two more lots adjacent to Habitat Park have been donated by the city to Habitat Park.
- City of Rock Island gave final approval to build Cascade Gardens, a 70-unit apartment complex for mentally challenged residents and their families. The RIHA was granted $12 million from IHDA for this project. The project was completed in summer 2011 and occupied in 2012.
- The Rock Island Housing Authority (RIHA) submitted a pre-application for 2010 LIHTC and has been extended the opportunity to submit a complete application with the Illinois

Housing Development Authority (IHDA) for 2010 Low-Income Housing Tax Credits (LIHTC) and if awarded, would allow the agency to develop Lincoln Homes and Manor Homes with newly constructed units that remain affordable for families that currently participate in public housing programs. The new development will be mixed-income including a minimum of 20% of the units as market-rate. Lincoln Homes will develop 28 new housing units and Manor Homes will develop 70 new housing units.

- The Rock Island community received two separate grant allocations for the Neighborhood Stabilization Program (NSP). Grant funding under NSP will be used to: demolish blighted properties; acquire vacant, foreclosed, and abandoned properties; rehab and redevelop vacant, foreclosed, and abandoned properties to meet local housing standards and improve marketability; provide affordable homeownership opportunities to households earning up to 120% of the area median income by offering downpayment assistance and soft-second mortgages.

Identified Impediment – Limited Accessible Housing Units

- The Rock Island community received two separate grant allocations for the Neighborhood Stabilization Program (NSP). Grant funding under NSP will be used to demolish blighted properties; acquire vacant, foreclosed, and abandoned properties; rehab and redevelop vacant, foreclosed and abandoned properties to meet local housing standards and improve marketability; provide affordable homeownership opportunities to households earning up to 120% of the area median income by offering downpayment assistance and soft-second mortgages.

Identified Impediment – Lack of Developable Land

- City of Rock Island donated land to Habitat for Humanity to build seven affordable new homes. All seven homes have been built. The City has now donated 2 additional lots.
- The Rock Island community received two separate grant allocations for the Neighborhood Stabilization Program (NSP). Grant funding under NSP will be used to: demolish blighted properties; acquire vacant, foreclosed, and abandoned properties; rehab and redevelop vacant, foreclosed, and abandoned properties to meet local housing standards and improve marketability; provide affordable homeownership opportunities to households earning up to 120% of the area median income by offering downpayment assistance and soft-second mortgages.

Identified Impediment – Lack of Local Fair Housing Law and Education Efforts

- City of Rock Island established a Human Rights Commission that can advise or mediate housing, employment, or discrimination disputes.

Identified Impediment – Aging Housing Stock Containing Lead-Based Paint

- 70+ units have been made lead safe.
- Three contractor trainings have been held.
- 91 deliveries of community outreach.

Identified Impediment – Regulatory Issues such as Zoning and Historic Compatibility Compliance

- No further steps taken.

B. Fair Housing Organizations

Davenport, Moline and Rock Island each have commissions that are responsible for receiving and responding to charges of fair housing law violations. A summary of information regarding the organization, function, staffing and funding of these commissions and each municipality's fair housing ordinance is given below.

- **Davenport Civil Rights Commission** - The State of Iowa requires each of its cities with a population of 29,000 or more to have a civil rights commission. In 1974, the City of Davenport created the Davenport Civil Rights Commission (DCRC). DCRC is governed by a seven-member board of commissioners that is appointed by the mayor and confirmed by city council.

  The mission of the DCRC is to secure for all Davenport residents freedom from discrimination because of race, color, religion, creed, sexual orientation, gender identity, national origin or ancestry, age, mental or physical disability, marital status and familial status in the areas of employment, housing, public accommodation, education and credit.

  DCRC investigates and responds to fair housing complaints. It engages in numerous education and outreach services to residents, landlords, tenants, bankers, counselors, local leaders, government officials, public service providers, REALTORS® and other groups to increase public awareness of fair housing issues and discriminatory real estate and mortgage lending practices.

  The DCRC partners with the City of Davenport in the review of plans for new residential construction and alterations to insure such development complies with the federal Fair Housing Act. It also reviews plans for commercial buildings and public accommodations to insure compliance with the American with Disabilities Act.

  Due to lack of resources, DCRC's real estate testing thus far has been limited to disability testing. (Disabilities are the second most common basis of fair housing complaints.) The commission suspects that predatory lending and redlining have occurred in Davenport and would like to conduct additional testing for these and a number of other issues.

  Through a partnership with John Deere Corporation, the DCRC is able to use John Deere Corporation attorneys to handle DCRC's fair housing mediation disputes.

  DCRC is a well-established and respected organization that has successfully resolved many fair housing disputes for city residents. The commission has four fulltime employees and one part-time employee. It is funded through several sources, including City of Davenport general funds and other city funds, a HUD grant, Equal Employment Opportunity Commission funds, and Iowa Civil Rights Commission funds. DCRC's lack of adequate resources (according to DCRC, it needs at least one more staff person) is the major drawback to its being able to more fully accomplish its mission.

  Division III of the City of Davenport's Civil Rights Ordinance (Chapter 2.58, as amended, of the incorporate terminology appropriate to the City of Davenport and the State of Iowa.

Fair Housing Best Practices

Davenport Civil Rights Commission staff present, sponsor or participate in more than 30 educational/outreach efforts annually.

Davenport Civil Rights Commission staff present fair housing training and education through the Landlord Education Assistance Program (LEAP.)

DCRC reviews plans for new residential construction and alterations, and plans for commercial buildings and public accommodations, to insure compliance with the federal Fair Housing Act and the American with Disabilities Act, as applicable.

Through a partnership with John Deere Corporation, the DCRC receives pro bono legal services to handle fair housing mediation disputes.

- **Moline Human Rights Commission** – The Moline Human Rights Commission (MHRC) was established by city ordinance in 2002. The commission is comprised of seven members with varied backgrounds. These commissioners are appointed by the mayor and approved by City Council.

  The Commission's purposes include helping end unlawful discrimination in Moline and helping to create a Rock Island County-wide human rights commission to serve all participating local governments and their citizens.

  The MHRC is listed under "Boards and Commissions" on the City of Moline website, but neither the city's website nor MHRC's website (or brochure) specifically mentions fair housing. This would pose problems for anyone attempting to inquire about fair housing issues in Moline or wishing to file a fair housing complaint.

  The MHRC's website invites anyone experiencing discrimination to file a complaint with the commission. The commission has a complaint intake form on which information about the nature of the complaint and the commission's advice to the client is recorded. This advice consists of informing complainants that the MHRC does not undertake any investigation or attempt any resolution of the complaints it receives. Instead, MHRC merely logs the complaints it receives and informs complainants that filing a complaint with the MHRC has no legal effect and will not toll any applicable statute of limitations or timeliness deadlines. Complainants are advised that, in order to realize any action on their complaint, they must also file a complaint with the Illinois Department of Human Rights, the Illinois Human Rights Commission or the appropriate federal agency to satisfy any statutory or administrative deadlines.

  Persons choosing to file complaints are advised of their right to file a complaint with state and/or federal agencies, and given contact information for those state and federal agencies. MHRC does not follow up with potential complainants to learn whether they actually filed a complaint with state or federal agencies.

  Requiring local fair housing complainants to file their complaints with state or federal agencies and then rely on those state or federal agencies to resolve local fair housing complaints probably has a chilling effect on the filing of such complaints. Potential complainants may believe that state or federal agencies are too far removed, and/or are too busy, to promptly and adequately resolve their complaints.

  MHRC representatives interviewed during the preparation of the AI stated that the commission's recent efforts have concentrated on fair housing education and advocacy. The commission has prepared a presentation on fair housing issues for community education and sent flyers to many organizations offering fair housing education opportunities. The commission has not done any fair housing testing.

  The John Deere Corporation attorneys that provide the Davenport Civil Rights Commission with mediation counseling services have offered their pro bono services to the MHRC for its fair housing dispute mediations.

The MHRC has not been able to maintain a full complement of members on its seven-member board. Currently, the board has just three members, and the commission is in the process of reorganizing. Commission members met with the mayor in December 2011 to discuss the commission's seven-point plan for changing and improving the MHRC. The elements of this seven-point plan are:

1. Host a human relations commission summit with other Quad City area human relations commissions to re-think the role and capacity of the MHRC
2. Review and renew MHRC by-laws via updates and changes.
3. Assist the mayor in finding new members for the MHRC commission to help meet the commission's goals and strategies.
4. Establish an annual event for the community.
5. Improve the MHRC website to increase community awareness and education regarding MHRC's mission and role in the community.
6. Re-establish an updated MHRC informational flyer for distribution to community agencies and/or businesses.
7. Provide an annual report and recommendations to the mayor on the state of the MHRC.

MHRC has no staff of its own. Instead, it relies on a designated city employee to perform administrative tasks. The commission receives financial support from City of Moline general funds for operating and staff support and from the city's CDBG funds for operating support.

The City of Moline does not have a fair housing ordinance.

- **Rock Island Human Rights Commission** – The Rock Island Human Rights Commission (RIHRC) is comprised of twelve city residents who are broadly representative of the community. These commissioners are appointed by the mayor and approved by city council.

  The commission's overall purpose is to employ education and persuasion to eliminate prejudice and discrimination based solely on race, color, creed, age, sex, national origin, ancestry, religion, marital status, mental or physical disability, military status, sexual orientation, or unfavorable discharge from military service.

  The RIHRC also serves as the city's fair housing board regarding housing-related discrimination complaints. The commission's role in this regard is to receive, review and process written complaints alleging discriminatory actions, and to mediate disputes that arise from those complaints. The commission may hold hearings, issue findings of fact and make recommendations to city council regarding actions to be taken to resolve complaints. In some case, a complaint may be referred to the Illinois Department of Human Rights or other agency if it cannot be resolved locally.

  The RIHRC website notes that filing a complaint with RIHRC should not take the place of filing a complaint with the Federal Equal Employment Opportunity Commission, the Illinois Department of Human Rights, or any other state or federal agency that may address issues of discrimination. The website further cautions potential complainants that, in order to preserve their legal rights and potential remedies under various federal and state statutes, the appropriate state and federal agencies should be contacted, particularly with regard to the timing with which a complaint must be filed.

The RIHRC is listed under "Boards and Commissions" on the City of Rock Island website, but the city's website does not having any listing or direct links for fair housing. This would pose problems for anyone attempting to inquire about fair housing issues in Rock Island or wishing to file a fair housing complaint.

RIHRC representatives interviewed during the preparation of the AI stated that the commission has not been very active and its enforcement powers are weak. Its main duty is to mediate disputes, and it has only had a handful of complaints over the last five years. It has conducted education and outreach efforts, but they have not been well attended. The commission has not done any fair housing testing.

The RIHRC is in the process of reorganizing. It held a public hearing on January 19, 2012 to get input on potential changes to the commission's role and method of operations. The results of that meeting have not yet been provided to M&L.

RIHRC has no staff or budget of its own. Its work is financed by City of Rock Island general funds and its CDBG funds. These funds are used to support staff from the city's Department of Community and Economic Development that performs the commission's administrative tasks.

The City of Rock Island has a rudimentary fair housing ordinance (Section 2-256 of the Rock Island Code of Ordinances) that contains a list of unfair practices concerning the sale or rental of residential real estate. It does not contain any of the other provisions of the federal Fair Housing Act and is therefore not substantially equivalent to that Act.

Requiring local fair housing complainants to file their complaints with state or federal agencies and then rely on those state or federal agencies to resolve their complaints probably has a chilling effect on the filing of such complaints. Potential complainants may believe that state or federal agencies are too far removed, and/or are too busy, to promptly and adequately resolve their complaints.

The Moline and Rock Island Human Relations Commissions have little or no enforcement powers. Both are in the process of reorganizing.

None of the three cities' website home pages have any listing or direct link for fair housing. This poses problems for anyone attempting to inquire about fair housing issues or wishing to file a fair housing complaint

Moline has no fair housing law to enforce, and Rock Island has only a rudimentary fair housing ordinance.

C. Advocacy Organizations

Several advocacy organizations whose services include fair housing-related issues operate in the

three entitlement cities. A description of these organizations and their functions is included below.

Project NOW is a community action agency that serves residents of Rock Island County, IL. Its housing-related services include financial assistance with emergency repairs and utility bills, homebuyer education seminars, rehabilitation programs, affordable housing rental units, and a homebuyer program.

Casa Guanajuato Quad Cities offers assistance, advocacy, information, training, referral, and interpretation services to low/moderate income Hispanic families. It works with its clients to overcome language and cultural barriers to enable full participation in society and seeks collaborative efforts with local, leaders to achieve these goals.

World Relief provides refugee resettlement for approximately 175 refugees annually in the Illinois Quad Cities. It also provides employment services, interpretive services, tenant/landlord rights and responsibilities education, legal aid, short term case management, and other services to refugees and immigrants. (Refugees are people who have been forced to leave their native countries for any number of reasons and cannot return home. Immigrants are people who have willfully left their native countries and can return to them if they choose to do so.)

League of United Latin American Citizens (LULAC) is an all-volunteer organization that seeks to advance the civil rights of Quad Cities area Hispanics through education and interpretive services. It is a conduit for information about private market rental practices and procedures and local government services and programs, e.g., property inspections, available city services, home ownership opportunities, etc.

HELP Legal Assistance provides legal services to low-income and senior citizens in Scott County, IA. It also conducts outreach efforts to tenant groups regarding their rights and responsibilities. Clients who approach HELP with fair housing complaints are referred to the Davenport Civil Rights Commission.

Scott County Housing Council is a local housing trust fund promotes housing for fair housing protected classes. It provides funding for affordable housing projects sponsored by organizations that advocate for fair housing and persons with disabilities.

Illinois-Iowa Center for Independent Living is an advocacy and service provider for people with disabilities. Its mission is to create and maintain independence options for people with disabilities by advocating for civil rights, providing services and promoting full participation of its clients in all aspects of the community.

Handicapped Development Center is a nonprofit organization whose purpose is to plan, establish and operate programs that provide opportunities and assistance to people with disabilities in and around Scott County. It provides employment services, personal independence services and community residential services. HDC's Residential Center in Davenport provides intensive services to 54 children and adults who experience significant intellectual and/or physical disabilities.

Quad City Alliance for Immigrants and Refugees (QCAIR) is a newly formed group with 29 member organizations, including eight different ethnic community-based organizations. QCAIR was created to address the issues related to the influx of refugees and immigrants into the area. Its mission is to build a community among the Quad Cities' refugees, immigrants and citizens. QCAIR's is structuring an information clearinghouse for refugee and immigrant services and identifying overlaps and gaps in services. Other roles include cultural celebration, housing advocacy, positive interaction with police, education for people with limited English proficiency, and job/employment efforts. Eventually, the group may serve as a direct service provider.

At focus group interviews conducted during the preparation of the AI, some agencies and organizations who work with minority populations stated that there is a perception among some of these groups that local residents and governments are unfriendly toward minorities. Consequently,

some minority residents do not trust that local government is interested in helping them overcome the barriers that prevent them from being fully integrated into society.

Some members of minority populations view local residents and governments as unfriendly toward minorities and do not trust local government to helping them overcome fair housing and other barriers.

Fair Housing Best Practice:

The recent creation of QCAIR to address issues related to the influx of refugees and immigrants will aid protected classes in identifying and securing fair housing rights.

7. General Fair Housing Observations

This section of the AI is a summary of general observations included in earlier sections of the report. General observations include the results of primary and secondary research that define the underlying conditions, trends, and context for fair housing planning across the Quad Cities region and in Davenport, Moline and Rock Island. These observations in and of themselves do not necessarily constitute impediments to fair housing choice. Rather, they establish a contextual framework for the impediments to fair housing choice that are presented in the following section of the AI.

A. Demographic and Housing Market Observations

The following observations regarding Quad City demographics and housing market conditions are relevant to fair housing choice issues.

1. While the population of the Davenport-Moline-Rock Island MSA remains overwhelmingly White, the MSA's non-White population grew 89.1% between 1990 and 2010.
2. There are a total of 72 areas of minority concentration in the three entitlement communities. One half of these are concentrations of Hispanics, 28 are concentrations of Blacks, and just eight are concentrations of Asians. Rock Island has the most AOCs (28), including the most Hispanic AOCs (17). Davenport has 27 AOCs, including the most Black AOCs (14). Half of Moline's 17 AOCs are concentrations of Hispanics.
3. The cities of Davenport, Moline and Rock Island have low to moderate levels of segregation between Whites and minority populations.
4. There are 18 impacted areas in Davenport, 8 in Moline, and 23 in Rock Island. These impacted areas include concentrations of both LMI persons and minorities.
5. Refugee populations face many challenges in acquiring and maintaining decent, affordable housing. These challenges include limited credit histories, lack of knowledge of housing rights, inadequate supply of housing suitable for large families, and limited English proficiency.
6. In Davenport, Moline and Rock Island, minorities were much more likely than Whites to live in larger households.
7. Assisted housing is often the housing of last resort of families with children and families with disabilities.
8. In Davenport, Moline and Rock Island, ownership of a median sales priced home is unattainable for minorities who earn the median household income.
9. The large number of native Spanish speakers with LEP in Davenport, Moline and Rock Island may experience restricted housing choice unless information about housing programs and services is available in Spanish.
10. Unemployment rates for minorities are generally close to double the rates for White persons, with Black persons faring slightly better than Hispanic persons.
11. In Davenport, Moline and Rock Island in 2010, higher percentages of vacant housing units were most often located in Impacted Areas. For example, 47% of Davenport's vacant housing units was located in Impacted Areas, as was 44% of Moline's vacant units and 59% of Rock Island's vacant units.

12. Although Davenport's Impacted Areas contain 29% of the city's housing units, these units comprise 41% of the city's units that lack complete plumbing, are overcrowded and were built before 1950.

13. Rock Island's Impacted Areas contain 44% of the city's housing units, including 45% of the city's units that lack complete plumbing, 58% of the city's overcrowded units and 57% of the city's housing built before 1950.

B. Observations Relative to Fair Housing Complaints

1. Analysis of the fair housing complaints received by HUD and the Davenport Civil Rights Commission since 2005 indicates the persistence of discrimination in the housing market, especially regarding race and disability.

2. In order to become effective fair housing advocacy organizations, the human rights commissions in Moline and Rock Island must reorganize their agencies and identify their fair housing roles.

C. Observations Relative to Public Sector Policies

1. CDBG funding application packets for the three cities do not include any mention of affirmatively furthering fair housing choice as one of the criteria used to evaluate funding applications.

2. CDBG sub-recipient agreements should include explicit references to the need to comply with the Fair Housing Act and state and local fair housing laws.

3. The cities of Davenport and Rock Island should continue to balance their respective CDBG and HOME investments between the revitalization of impacted areas and the creation of new housing opportunities in non-impacted areas.

4. If grantees such as the cities of Davenport, Moline, and Rock Island provide CDBG and/or HOME funds for housing developments with five or more units, federal regulations require that they adopt affirmative marketing procedures and requirements for such developments.

5. Minority populations are generally under-represented on the three cities' housing-related appointed boards and commissions.

6. The Comprehensive Plans for both Moline and Davenport lack housing and land use strategies that would expand the opportunities available to members of the protected classes.

7. Rock Island's neighborhood-specific planning focus leaves a gap concerning issues best addressed at a communitywide level, such as fair housing.

8. Each city's cap on the number of unrelated individuals who may live together as a family limits fair housing choice for persons with disabilities.

9. An official or unofficial policy not to allow or to restrict the development of group homes for persons with disabilities limits the affordable, accessible and non-institutional housing opportunities available to disabled persons.

10. The cities of Moline and Rock Island should allocate 1% to 3% of their annual CDBG entitlement grants for fair housing activities.

11. The planning policy documents of the three cities should strive to define the location of jobs held by lower wage employees and analyze the location of affordable housing within the context of public transit routes. The stated goal should be to expand the supply of decent affordable housing that is within proximity to entry-level/lower-skill jobs.

12. The large number of MHA new voucher holders who return their vouchers due to inability to find suitable units in the private market underscores the need to increase the supply of such units and the need to solicit more landlords to participate in the Section 8 program.

D. Observations Relative to Private Sector Policies

1. Preferences for particular family types were detected among the various real estate advertising outlets reviewed for the AI, suggesting that local newspapers could improve their screening processes related to potential housing discrimination.

2. Mortgage loan denial rates among racial and ethnic minority applicants were higher than the denial rate for White applicants between 2008 and 2010. Rejections for Black, Hispanic, and Other Race applicants were less likely to be accompanied by a reason for denial. Overall, the reasons for denial were limited.

3. Testing may be required to determine if some real estate agents and lending institutions are engaging in discriminatory practices that violate the federal Fair Housing Act or state or local fair housing laws. There is a continuing need for real estate testing for race and disability (particularly for rental units), testing among real estate agents for race, mortgage lending testing, and homeowners insurance testing.

8. Impediments to Fair Housing Choice

A. Public Sector

1. Lack of decent affordable housing

There are a number of data sources that attest to the lack of decent affordable in Davenport, Moline and Rock Island. This confirming data includes the following:

- Census data indicating a loss of 7,500 affordable rental units in the three cities during the last decade.
- There is a relative shortage of larger rental units in Davenport, Moline and Rock Island.
- National Low Income Housing Coalition studies that show that minimum wage earners and single-wage earner households cannot afford the HUD fair market rent for a two-bedroom apartment in the Quad Cities area.
- Individuals whose sole source of income is a $674 monthly social security check cannot afford an efficiency unit at HUD's fair market rent of $467.
- Real estate multi-list data and census data reveals that ownership of a median price sales home in the Quad Cities area is unattainable for minorities who earn the median household income.
- Black households and families with children are disproportionately represented among current and prospective public housing and Section 8 tenants, and families with disabilities are disproportionately represented among current and prospective Section 8 tenants, indicating a disproportionate need of these groups for affordable housing.
- Public housing authority waiting lists for public housing and Section 8 vouchers require years of waiting to rise to the top of the lists, underscoring the need for affordable housing.
- Anecdotal evidence provided by social service agencies, advocates for people with disabilities, and similar organizations who assert that there is a serious shortage of safe, affordable and accessible units for their clients.

The cities of Davenport, Moline and Rock Island should continue to balance their respective CDBG and HOME investments between the revitalization of impacted areas and the creation of new housing opportunities in non-impacted areas.

Proposed Action Step: Continue to make affordable housing investments in both impacted and non-impacted areas.

Proposed Action Step: Reduce or waive permit fees for area developers and non-profits seeking to build affordable housing.

Proposed Action Step: Increase outreach to landlords to get additional Section 8 participating landlords, particularly property owners with units located outside of Impacted Areas.

Proposed Action Step: Secure funding or other resources (e.g., volunteer organizations) to provide needed accessibility modifications for tenants who cannot afford them.

Proposed Action Step: Increase the supply of accessible affordable units for people with physical disabilities.

Proposed Action Step: Davenport, Moline and Rock Island should continue administering lead paint programs to reduce the associated hazards in the cities' affordable housing stock for protected classes.

2. Failure to identify affirmatively furthering fair housing choice as a project requirement and evaluation consideration in the CDBG application packet

The CDBG funding application packets for the three cities do not include any mention of affirmatively furthering fair housing as one of the criteria used to evaluate funding applications, but the three cities hold annual mandatory training workshops to explain the fair housing responsibilities of CDBG sub-recipients.

Proposed Action Step: Each of the three cities should amend its CDBG application packet to include affirmatively furthering fair housing choice as one of the city's considerations when evaluating CDBG applications.

Proposed Action Step: Moline should amend its CDBG application packet to explicitly state that successful applicants must comply with federal, state and local fair housing laws.

Proposed Action Step: Moline should amend its CDBG sub-recipient agreement to include a paragraph under Article IX. PERSONNEL & PARTICIPANT CONDITIONS that explicitly addresses fair housing compliance. This amendment should clarify to sub-recipients that compliance with the Illinois Human Rights Act and the Civil Rights Act entails compliance with the Fair Housing Act.

Proposed Action Step: Moline should amend its CDBG application packet to include a checklist of evaluation criteria for CACUP to use when reviewing applications.

Proposed Action Step: Rock Island should amend its CDBG application packet to explicitly state that successful applicants must comply with federal, state and local fair housing laws.

3. Lack of Site Selection Policy for HOME Program in Davenport

The cities of Davenport, Moline, and Rock Island do not currently have affirmative marketing policies in place. HUD requires an affirmative marketing policy for CDBG- or HOME-assisted projects with five or more units.

As a recipient of HOME funds, the city of Davenport is required to have a site and neighborhood selection policy. Currently, Davenport does not have any formal site or neighborhood standards in place.

Proposed Action Step: The three cities should adopt affirmative marketing policies for their CDBG- and HOME-assisted housing projects with five or more units.

Proposed Action Step: The City of Davenport should prepare a written site and neighborhood selection policy, including a site checklist. The city should incorporate the checklist and policy requirements as part of the application review and approval process for

all applicable HOME-assisted projects. All housing providers, builders, and developers should receive a copy of the policy and checklist as part of the city's HOME application package. HUD's site and neighborhood's standards should also be incorporated into the city's written agreements with developers, sub-recipients, and CHDOs.

4. Inadequate representation of the protected classes on appointed local boards and commissions dealing with housing-related issues

Minority populations are generally under-represented on the three cities' housing-related appointed boards and commissions.

Proposed Action Step: Conduct outreach to members of the protected classes to recruit them to serve on housing-related boards and commissions when vacancies occur through resignation or term expiration.

5. Inadequate supply of affordable accessible residential units

Interviews with various social service agencies and disability advocacy organizations identified a need for affordable accessible units for persons with disabilities, but did not quantify this need and there is no database with an inventory of such units.

DCRC's 2005 survey suggests that architects, code enforcement officials, and others associated with new residential construction may not be aware of their regulatory obligations in regard to accommodating persons with disabilities.

Proposed Action Step: Davenport, Moline and Rock Island should amend their rental property inspection checklists to include information on interior and exterior accessibility features of the properties. This information can then be used to construct a database of accessible rental properties.

Proposed Action Step: Davenport, Moline and Rock Island should continue to collaborate with social service agencies and disability advocacy organizations to identify funding sources to provide affordable accessible residential units for the protected classes, including City general funds, CDBG entitlement funds, and HOME entitlement funds.

Proposed Action Step: The Davenport Housing Commission should complete its Section 504 Needs Assessment and Transition Plan and promptly take required remedial actions.

Proposed Action Step: The Davenport Civil Rights Commission should continue its practice of reviewing all new residential construction plans for accessibility compliance.

6. Questionable access to public services and programs for persons with limited English proficiency

A number of social service agency stakeholders interviewed during the preparation of the AI indicted that there is a definite need for securing the services of independent, certified translators to assist the area's growing number of persons with LEP access CDBG programs and services. In light of the recent expansion in LEP populations in the Quad City area, including an influx of refugees and immigrants, Moline and Rock Island should consider conducting a formal four-factor analysis to determine whether they need to prepare and adopt LAPs.

Proposed Action Step: Davenport, Moline and Rock Island should individually conduct the four-factor analysis to determine if a Language Access Plan is needed.

7. Lack of housing and land use strategies in local plans to further fair housing choice

The comprehensive plans for Davenport and Moline lack housing and land use strategies that would expand the opportunities available to members of the protected classes. Rock Island's neighborhood-specific planning focus leaves a gap concerning issues like fair housing that are best addressed at a communitywide level.

Proposed Action Step: Davenport should strengthen its comprehensive plan by adding an overarching statement of intention to affirmatively further fair housing choice and policy goals and objectives that address this intention.

Proposed Action Step: Moline should strengthen its comprehensive plan by adding an overarching statement of intention to affirmatively further fair housing choice and policy goals and objectives that address this intention.

Proposed Action Step: Rock Island should adopt a stand-alone fair housing policy or diversity statement to identify and implement fair housing goals and objectives.

8. Minimal amount of land zoned and available for multi-family housing

Zoning categories established by the cities provide for a variety of housing types. However, the amount of land zoned and available for multi-family housing appears to be minimal. Apartments are permitted in only a small fraction of the cities' land. A lack of vacant land available for apartments and other types of multi-family housing could limit housing options for members of the protected classes, who are disproportionately represented among the cities' renter populations.

Proposed Action Step: Davenport, Moline and Rock Island should consider amending their zoning maps to increase the amount of land they have zoned and available for multi-family housing development.

9. Restrictive zoning definitions of "family"

Restrictive definitions of family (i.e., that cap the number of unrelated individuals that can live together) may impede the development of group homes, effectively limiting housing choice for persons with disabilities. All three cities restrict the number of unrelated individuals who may live together, but their regulations do make exceptions for group homes for people with disabilities.

Each city's cap on the number of unrelated individuals who may live together as a family limits non-traditional housing arrangements, many of which exist for economic reasons. A more ideal definition of family, from a fair housing perspective, would not distinguish between unrelated and related persons, but would instead focus on the manner in which the persons live together as a cohesive household.

Proposed Action Step: Davenport, Moline and Rock Island should consider amending their zoning definitions of family to facilitate fair housing choice for non-traditional, non-student family households.

10. Overly Restrictive Regulations for Group Homes for Persons with Disabilities

Davenport's zoning ordinance does not include "family home" (which would include group homes for persons with disabilities) as a use permitted by right in any zoning district. Because a family in Davenport cannot consist of more than five unrelated persons, it appears currently impossible to establish a "family home" for between 6-8 persons with disabilities, as defined in the ordinance, in single-family districts.

Proposed Action Step: Davenport should amend its zoning ordinance to permit group homes with six to eight persons with disabilities.

Moline's zoning ordinance requires developers proposing group homes for persons with disabilities to request a reasonable accommodation to avoid the mandated buffer requirements and needs assessment required of other use types in the city's "group residential " category.

Proposed Action Step: Moline should amend its zoning ordinance to define "group homes for persons with disabilities" as a separate use category and thereby remove the barriers posed by requirements for other uses in the "group residential" category.

11. Inadequate HUD-Required Documents

The Davenport Housing Commission's Admissions and Continued Occupancy Plan and Housing Choice Voucher Administrative Plan are deficient and need to be amended to meet all HUD requirements.

Proposed Action Step: Amend the Davenport Housing Commission Admissions and Continued Occupancy Plan and Housing Choice Voucher Administrative Plan.

12. Lack of or Inadequate Public Transit

The limited operating hours of the area public transit systems pose difficulties for second and third shift workers whose shifts begin or end before or after the systems' daily operating hours. Limited resources often prevent adequate service offerings for these workers.

Stakeholders also noted the long travel times needed for commutes that require transfers between routes and the difficulties encountered in relying on public transit for travel from one side of the river to the other.

Proposed Action Step: Implement the transit-related actions steps in municipal comprehensive plans or other local plans to maximize the linking of affordable housing with access to employment centers, services, and amenities.

Proposed Action Step: Continue to work with regional transit agencies to provide the most optimal, economically feasible public transit options for minority and low and moderate income households.

Proposed Action Step: For any proposed multi-family residential development (greater than four units), during the project review process, Davenport and Rock Island should consider the proposed project's site location for proximity to and suitability and accessibility for public transit and consumer access to bus shelters. More specifically, review of new residential developments should include a plan review by the Bi-State Regional Commission (the metropolitan planning organization) for its comments on to what degree the proposed development could accommodate public transit.

13. Lack of knowledge about fair housing laws and landlord/tenant rights and responsibilities

Many of the stakeholders interviewed during the AI process cited a widespread lack of knowledge among the protected classes about fair housing laws and landlord/tenant rights and responsibilities as a major obstacle in achieving fair housing goals. This ignorance persists even though many organizations and local government agencies regularly engage in fair housing public outreach and education efforts.

None of the three cities' website home pages have any listing or direct link for fair housing. This poses problems for anyone attempting to inquire about fair housing issues or wishing to file a fair housing complaint.

The Moline Human Relations Commission requires local fair housing complainants to file their complaints with state or federal agencies and then rely on those state or federal agencies to resolve the complaints. This may have a chilling effect on the filing of such complaints. Potential complainants may believe that state or federal agencies are too far removed, and/or are too busy, to promptly and adequately resolve their complaints.

Proposed Action Step: Continue/increase the number of public outreach efforts at which fair housing educational materials are presented and distributed, especially in neighborhoods that are home to the protected classes. Attendance and presentations by city officials may combat the perception that local governments are not concerned with the welfare of the protected classes.

Proposed Action Step: Add a fair housing tab to the menu bar on the home page of the city's websites to facilitate easy access to fair housing information.

Proposed Action Step: Moline should make presentations to public housing authority residents regarding renters' rights and responsibilities. The city should determine the most appropriate party(ies) to make these presentations-- government officials, city staff, representatives of social service and advocacy agencies, housing authority personnel, or others--to reach the maximum audience.

Proposed Action Step: Rock Island should make presentations to public housing authority residents regarding renters' rights and responsibilities. The city should determine the most appropriate party(ies) to make these presentations—government officials, city staff, representatives of social service and advocacy agencies, housing authority personnel, or others—to reach the maximum audience.

Proposed Action Step: Present fair housing workshops at meetings sponsored by Quad City Alliance for Immigrants and Refugees (QCAIR).

Proposed Action Step: In Rock Island, continue to require landlords to attend annual workshops on code enforcement, fair housing, and landlord/tenant rights and responsibilities in exchange for a partial rebate of their city rental property inspection fee.

14. Lack of local fair housing ordinance

The City of Moline does not have a fair housing ordinance.

Proposed Action Step: Moline should prepare and adopt a fair housing ordinance. Add this ordinance to the elements listed under the fair housing tab in the menu bar on the home page of the city's website.

15. Inadequate fair housing ordinance

The City of Rock Island has a rudimentary fair housing law.

Proposed Action Step: Rock Island should prepare and adopt a fair housing ordinance. Add this ordinance to the elements listed under the fair housing tab in the menu bar on the home page of the city's website.

16. Ineffectual fair housing organization

In Moline and Rock Island, the cities' human relations commissions are not very active organizations and their enforcement powers are weak.

Proposed Action Step: Moline should implement its Seven-Point Plan to reorganize and re-energize the city's Human Rights Commission. This effort should include establishing a process for reviewing, evaluating and resolving fair housing complaints at the local level.

Proposed Action Step: Rock Island should implement the plans it is preparing to reorganize and re-energize the city's Human Rights Commission. This effort should include strengthening the process for reviewing, evaluating and resolving fair housing complaints at the local level.

Proposed Action Step: Conduct a summit meeting of Quad City area fair housing organizations to exchange information and ideas about "best practices" for addressing fair housing issues.

Proposed Action Step: Moline's Human Rights Commission should pursue the possibility of obtaining pro bono legal assistance from attorneys of the John Deere Corporation to mediate fair housing disputes, similar to Davenport Civil Rights Commission's efforts.

Proposed Action Step: Rock Island's Human Rights Commission should pursue the possibility of obtaining pro bono legal assistance from attorneys of the John Deere Corporation to mediate fair housing disputes, similar to Davenport Civil Rights Commission's efforts.

17. Lack of employment opportunities for minority and low and moderate income households

In Davenport, Moline and Rock Island, census data indicates that:

- Generally, Blacks and Hispanics were more likely than Whites and Asians to have annual incomes of less than $25,000.
- People with disabilities were much more likely to be living in poverty than people without disabilities.
- Unemployment rates for Blacks and Hispanics were much higher than for Whites. Higher unemployment means less income for housing expenses.

Proposed Action Step: Facilitate access to employment and job training programs.

Proposed Action Step: Continue to invest in economic development projects that create jobs for low and moderate income residents.

18. Cultural and language barriers for minority groups, including refugees and immigrants

At focus group interviews held during the preparation of the AI, agencies who work with LEP populations cited both cultural and language barriers as major factors that hamper their efforts to assimilate their clients into the community.

Proposed Action Step: Conduct fair housing education and outreach efforts to explain renters' rights and responsibilities.

Proposed Action Step: Provide adequate resources for independent certified interpreters/translators for minorities, refugees and immigrants.

Proposed Action Step: Support the efforts of the Quad City Alliance for Immigrants and Refugees to build a community of refugees, immigrants, and local citizens.

19. Perception that some local governments are unfriendly toward minorities and cannot be trusted to protect minorities' best interests

At focus group interviews conducted during the preparation of the AI, some agencies and organizations who work with minority populations stated that there is a perception among some of these groups that local residents and governments are unfriendly toward minorities. Consequently, some minority residents do not trust that local government is interested in helping them overcome the barriers that prevent them from being fully integrated into society.

Proposed Action Step: Increase outreach to minority groups to learn the bases for these perceptions.

Proposed Action Step: Attend community events in minority neighborhoods to meet residents and provide information on city programs and services.

Proposed Action Step: Establish and maintain on-going contact with agencies that serve minority populations and persons with LEP.

Proposed Action Step: Provide and/or increase funding to support agencies that serve minority groups and the protected classes.

Proposed Action Step: Increase the number of members of the protected classes who are appointed to boards and commissions that deal with housing-related issues.

20. In Davenport, Moline and Rock Island in 2010, concentrations of multi-family housing were most often located in Impacted Areas.

In the three cities, all or almost all of the census tracts in which the majority of the housing units were multi-family housing were located in Impacted Areas.

Proposed Action Step: Davenport, Moline and Rock Island should continue to invest a portion of their respective CDBG and HOME allocations to create new multi-family housing opportunities outside of Impacted Areas.

Proposed Action Step: Davenport, Moline and Rock Island should amend their zoning maps to increase the amount of land zoned and available for multi-family housing development.

21. With the exception of Hispanics, members of the protected classes are usually overrepresented in public housing and Section 8 housing.

Data provided by the Davenport Housing Commission, Moline Housing Authority and Rock Island Housing Authority indicates that between 42% and 84% of public housing residents are Black households; between 23% and 90% are families with children; and between 4% and 24% are families with disabilities.

Proposed Action Step: Davenport, Moline and Rock Island should continue to pursue other avenues of funding (e.g., low-income housing tax credits, Section 202 and Section 811) to provide additional units of decent affordable housing for low-income residents, elderly citizens and persons with disabilities.

Proposed Action Step: The Davenport Housing Commission, Moline Housing Authority and Rock Island Housing Authority should increase their outreach efforts to get additional Section 8 participating landlords, particularly property owners with units located outside of Impacted Areas.

Proposed Action Step: The city of Davenport should retain ownership of its 42 scattered-site public housing units to demonstrate the city's commitment to affirmatively further fair housing choice for protected classes.

B. Private Sector

1. Disproportionate impact of mortgage loan denial and high cost lending on the protected classes

HMDA data for Davenport, Moline and Rock Island for 2008- 2010 indicates:

- Mortgage loan denial rates among racial and ethnic minority applicants were higher than for White applicants.
- Upper-income minority households experienced higher denials rates than those for lower-income White households. While this fact alone does not imply an impediment to fair housing choice, the pattern is consistent with discrimination. This is an extremely common observation among markets across the U.S. during the years 2008 to 2010.
- Lower-income minority households were more likely to receive high-cost mortgage loans than lower-income White households. In addition, upper-income Black households were more likely to receive high-cost mortgage loans than upper-income White households and, in some cases, lower-income White households. Minority homeowners are thus at greater risk for eviction, foreclosure and bankruptcy.

Proposed Action Step: Conduct mortgage testing.

Proposed Action Step: Continue fair housing education and outreach efforts to consumers and lending institutions to identify and eliminate illegal mortgage lending practices.

Proposed Action Step: Continue financial education courses for minority groups through Quad City Dollarwi$e and other means.

2. Discriminatory practices in real estate, mortgage lending and homeowner insurance practices

Attendees at the public meeting held during the preparation of the AI asserted that some real estate agents and lending institutions engage in practices that violate the Fair Housing Act. These practices include steering, mortgage lending and interest rate discrepancies; and insurance cancellations, denials or exclusions.

Several stakeholders interviewed for the AI identified a need for real estate testing for race and disability. Testing among real estate agents for race appears to be needed as well, as does mortgage lending testing homeowner insurance testing.

The three entitlement cities would need to conduct fair housing testing to try to reveal such practices.

Proposed Action Step: Secure funding to undertake the various types of testing/audit needed to eliminate these practices and to aid in future fair housing planning.

Proposed Action Step: Continue fair housing education workshop presentations to REALTORS®, lending institutions, and insurance companies to help them identify and eliminate illegal practices.

3. Inadequate minority representation in the membership of the Quad City Area REALTORS® Association

Only about a dozen of QCARA's 715 members are minorities. QCARA's Board of Directors has discussed the need to solicit more minority members.

Proposed Action Step: Contact the Quad City Area REALTORS® Association and urge it to follow up with its Board of Director's stated intention to solicit more minorities for its membership rolls.

4. Discriminatory language in the real estate advertisements in local newspapers and other real estate publications

The real estate sections of three newspapers and a quarterly real estate magazine were reviewed to identify impediments to housing choice within the published advertisements for dwelling units offered for sale or for rent. A few of the advertisers showed the Equal Housing Opportunity or Equal Housing Lending logo. Several major real estate firms placed the HUD fair housing logo in their banner ads, but many large display advertisements did not include the logo. Some of the logos that were published were so small that the caption underneath the logo was unreadable.

The publisher's notice and the newspaper's policies on accepting and printing real estate ads in accordance with federal, state or local fair housing laws were included only in one newspaper and the quarterly real estate magazine. Neither of these notices listed all federal, state and local protected classes.

In the hundreds of for-sale and rental ads reviewed, there were no instances of blatantly discriminatory language. However, some ads contained questionable language. For example, there were ads that included phrases like "great starter or retirement home" or "house needs a loving family". Such wording may discourage members of the protected classes from pursuing action on the ad. The rule of thumb when advertising real estate for rent or sale is to describe the property, not the people who may want to live there. Any phrase that suggests a preference for a specific type of tenant is questionable.

Proposed Action Step: Initiate discussions with local REALTORS® and lending institutions to achieve more widespread publication of the HUD fairing housing logo, the equal opportunity housing logo and equal opportunity lending logo in their real estate advertisements, especially in large display advertisements.

Proposed Action Step: Contact publishers of local newspapers and other real estate publications to remind them of their responsibilities under federal, state and local fair housing laws regarding the publication of real estate advertisements.

Proposed Action Step: Contact publishers of local newspapers and other real estate publications and request that they exercise increased vigilance concerning advertisements that contain language that exceeds a description of the advertised property and instead states or implies the type of tenant or buyer who may want to live in or buy the property.

Proposed Action Step: Contact publishers of local newspapers and other real estate publications and request that they publish notices regarding their policies and legal obligations about publishing real estate advertisements that are in compliance with federal, state, and local laws. Such notices should include a list of the federal, state and local protected classes.

9. Fair Housing Action Plan for Davenport

ABBREVIATION KEY:
CPED = Davenport Community Planning and Economic Development Department
DCRC = Davenport Civil Rights Commission
DHC = Davenport Housing Commission

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Proposed Investment	Date Completed
Impediment #1: Lack of Affirmative Marketing Policy and Site Selection Policy for HOME Program in Davenport						
Create HUD-compliant documents	A. The City of Davenport should adopt an affirmative marketing policy for its CDBG and HOME-assisted housing projects with five or more units	A. CPED, city Council	A. HUD-compliant affirmative marketing policy	A. 2013-2014	A. N/A	
	B. The City of Davenport should prepare a written site and neighborhood section policy, including a site checklist. The City should incorporate the checklist and policy requirements as part of the application review and approval process for all applicable HOME-assised projects. All housing providers, builders, and developers should receive a copy of the policy and checklist as part of the City's HOME application package. HUD's site and nieghborhood's standards should also be incorporated into the City's written agreements with developers, subrecipients, and CHDOs.	B. CPED, City Council	B. HUD-complaint site and neighborhood selection policy	B. 2013-2014	B. N/A	
Impediment #2: Inadequate supply of affordable accessible residential units						
Increase the supply of affordable accessible units	A. The Davenport Housing Commission should complete its Section 504 Needs Assessment and Transition Plan and promptly take required remedial actions.	A. DHC	A. Completion of Section 504 study	A. 2013-2014	A. N/A	
	B. Davenport Civil Rights Commission should continue its practice of reviewing all new residential construction plans for accessibility compliance.	B. DCRC	B. Number of plans reviewed	B. Ongoing	B. N/A	
Impediment #3: Lack of housing and land use strategies in local plans to further fair housing						
Increased consideration of fair housing choice in comprehensice planning efforts	Davenport should strengthen its comprehensive plan by adding an overarching statement of intention to affirmatively further fair housing choice and policy goals and objectives that address this intention.	City Council	Amend comprehensive plan	2013-2014	$	
Impediment #4: Minimal amount of land zoned and available for multi-family housing						
Increase supply of land zoned and available for multi-family development	Davenport should amend its zoning map to increase the amount of land zoned and available for multi-family housing development.	City Council	Amended zoning map	2013-2014	$	

ABBREVIATION KEY:
CPED = Davenport Community Planning and Economic Development Department
DCRC = Davenport Civil Rights Commission
DHC = Davenport Housing Commission

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Proposed Investment	Date Completed
Impediment #5: Restrictive zoning definitions of "family"						
Adopt a more inclusive zoning ordinance definition of "family"	Davenport should consider amending its zoning definition of family to facilitate fair housing choice for non-traditional, non-student family households.	City Council	Amend zoning ordinance	2013-2014	$	
Impediment #6: Overly restrictive regulations for Group Homes for Persons with Disabilities						
Increase accommodations for group homes	Davenport should amend its zoning ordinance to permit group homes with six to eight persons with disabilities.	City Council	Amended zoning ordinance	2013-2014	$	
Impediment #7: Inadequate HUD-Required Documents						
Create HUD-compliant documents	Amend the DHC Admissions and Continued Occupancy Plan and Housing Choice Voucher Administrative Plan	DHC	HUD-compliant ACOP and HCV Admin Plan	2013-2014	N/A	

10. Signature Page for Davenport

As a recipient of CDBG funds and in order to comply with its certification to affirmatively further fair housing, the City of Davenport, Iowa, has conducted an Analysis of Impediments to Fair Housing Choice to assess the availability of fair housing choice within the City of Davenport. We have reviewed this Analysis and its recommended Actions and will support activities to assure nondiscrimination in the provision of housing and its accompanying transactions.

_____

Craig Malin, City Administrator

_____

Date

11. Fair Housing Action Plan for Moline

ABBREVIATION KEY:
MHA = Moline Housing Authority
MHRC = Moline Human Rights Commission
MP & DD = Moline Planning and Development Department

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Proposed Investment	Date Completed
Impediment #1: Failure to identify affirmatively furthering fair housing choice as a project requirement and evaluation consideration in the CDBG application packet						
Increased consideration of affirmatively furthering fair housing choice when making CDBG funding decisions	A. Moline should amend its CDBG application packet to explicitly state that successful applicants must comply with federal, state and local fair housing laws. B. Moline should amend its CDBG sub-recipient agreement to include a paragraph under Article IX. PERSONNEL & PARTICIPANT CONDITIONS that explicitly addresses fair housing compliance. This amendment should clarify to subrecipients that compliance with the Illinois Human Rights Act and the Civil Rights Act entails compliance with the Fair Housing Act. C. Moline should amend its CDBG application packet to include a checklist of evaluation criteria for CACUP to use when reviewing applications.	A. MP & DD B. MP & DD C. MP & DD	A. Amended Application packet B. Amended subrecipient agreement C. Amended Application packet	A. 2012-2013 B. 2012-2013 C. 2012-2013	A. N/A B. N/A C. N/A	
Impediment #2: Lack of housing and land use strategies in local plans to further fair housing						
Increased consideration of fair housing choice in comprehensive planning efforts	Moline should strengthen its comprehensive plan by adding an overarching statement of intention to affirmatively further fair housing choice and policy goals and objectives that address this intention.	City Council	Amend comprehensive plan	2012-2013	$	
Impediment #3: Minimal amount of land zoned and available for multi-family housing						
Increased supply of land zoned and available for multi-family development	Moline should amend its zoning map to increase the amount of land zoned and available for multi-family housing development.	City Council	Amended zoning map	2013-2014	$	
Impediment #4: Restrictive zoning definitions of "family"						
Adopt a more inclusive zoning ordinance definition of "family"	Moline should consider amending its zoning definition of family to facilitate fair housing choice for non-traditional, non-student family households.	City Council	Amend zoning ordinance	2013-2014	$	

ABBREVIATION KEY:
MHA = Moline Housing Authority
MHRC = Moline Human Rights Commission
MP & DD = Moline Planning and Development Department

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Proposed Investment	Date Completed
Impediment #5: Overly restrictive regulations for Group Homes for Persons with Disabilities						
Increase accommodations for group homes	Moline should amend its zoning ordinance to define "group homes for persons with disabilities" as a separate use category and thereby remove the barriers posed by requirements for other uses in the "group residential" category.	City Council	Amended zoning ordinance	2012-2013	$	
Impediment #6: Lack of knowledge about fair housing laws and landlord/tenant rights and responsibilities						
Increase knowledge about fair housing laws and landlord/tenant rights and responsibilities	Moline should make presentations to public housing authority residents regarding renters' rights and responsibilities. The City should determine the most appropriate party(ies) to make these presentations -- government officials, City staff, representatives of social service and advocacy agencies, housing authority personnel, or others -- to reach the maximum audience.	City Council, MP & DD, MHA	Number of presentations made	Ongoing	N/A	
Impediment #7: Lack of local fair housing ordinance						
Adopt a fair housing ordinance	Moline should prepare and adopt a fair housing ordinance . Add this ordinance to the elements listed under the fair housing tab in the menu bar on the home page of the City's website	City Council	Adoption of fair housing ordinance	2013-2014	$	
Impediment #8: Ineffectual fair housing organization						
Reorganize and re-energize the City's human rights commission	A. Moline should implement its Seven-Point Plan to reorganize and re-energize the City's human rights commission. This effort should include establishing a process for reviewing, evaluating and resolving fair housing complaints at the local level. B. Moline's human rights commission should pursue the possibility of obtaining pro-bono legal assistance from attorneys of the John Deere Corporation to mediate fair housing disputes	A. City Council, MHRC B. MHRC	A. Completion of Seven-Point Plan B. Obtain pro-bono legal counsel	A. 2012-2013 B. 2012-2013	A. N/A B. N/A	
Impediment #9: Questionable access to public services and programs for persons with limited English proficiency						
Determine the need for a Language Access Plan (LAP)	Conduct Language Access Plan (LAP) four-factor analysis to determine if an LAP is needed	MP & DD	Completion of LAP four-factor analysis	2013-2014	N/A	

12. Signature Page for Moline

As a recipient of CDBG funds and in order to comply with its certification to affirmatively further fair housing, the City of Moline, Illinois, has conducted an Analysis of Impediments to Fair Housing Choice to assess the availability of fair housing choice within the City of Moline. We have reviewed this Analysis and its recommended Actions and will support activities to assure nondiscrimination in the provision of housing and its accompanying transactions.

_____

Mayor Don P. Welvaert

_____

Date

13. Fair Housing Action Plan for Rock Island

ABBREVIATION KEY:
RIC & EDD = Rock Island Community and Deconomic Development Division
RIHA = Rock Island Housing Authority
RIHRC = Rock Island Human Rights Commission

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Proposed Investment	Date Completed
Impediment #1: Failure to identify affirmatively furthering fair housing choice as a project requirment and evaluation consideration in the CDBG application packet						
Increased consideration of affirmatively furthering fair housing choice when making CDBG funding decisions	Rock Island should amend its CDBG packet to explicitly state that successful applicants must comply with federal, state and local fair housing laws.	RIC & EDD	Amended application packet	2012-2013	N/A	
Impediment #2: Lack of housing and land use strategies in local plans to further fair housing						
Increased consideration of affirmatively furthering fair housing choice in comprehensive planning efforts	Rock Island should adopt a stand-alone fair housing policy or diversity statement to identify and implement fair housing goals and objectives.	City Council	Amend comprehensive plan	2013-2014	$	
Impediment #3: Minimal amount of land zoned and available for multi-family housing						
Increased supply of land zoned and available for multi-family development	Rock Island should amend its zoning map to increase the amount of land zoned and available for multi-family housing development.	City Council	Amended zoning map	2013-2014	$	
Impediment #4: Restrictive zoning definitions of "family"						
Adopt a more inclusive zoning ordinance definition of "family"	Rock Island should consider amending its zoning definition of family to facilitate fair housing choice for non-traditional, non-student households.	City Council	Amend zoning ordinance	2012-2013	$	

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Proposed Investment	Date Completed
Impediment #5: Lack of knowledge about fair housing laws and landlord/tenant rights and responsibilities						
Increase knowledge about fair housing laws and landlord/tenant rigts and responsibilities	Rock Island should make presentations to public housing authority residents regarding renters' rights and responsibilities. The City should determine the most appropriate party(ies) to make these presentations -- government officials, City staff, representatives of social service and advocacy agencies, housing authority perssonel, or others -- to reach the maximum audience	City Council, RIC & EDD	Number of presentations made	Ongoing	N/A	
Impediment #6: Inadequate fair housing ordinance						
Adopt a fair housing ordinance	Rock Island should prepare and adopt a fair housing ordinance. Add this ordinance to the elements listed under the fair housing tab in the menu bar on the home page of the City's website.	City Council	Adoption of a fair housing ordinance	2012-2013	$	
Impediment #7: Ineffectual fair housing organization						
Reorganize and re-energize the City's human rights commission	A. Rock Island should implement the plans it is preparing to reorganize and re-energize the City's human rights commission. This effort should include strengthening the process for reviewing, evaluating and resolving fair housing complaints at the local level.	A. City Council, RIHRC	A. Reorganize and re-energize human relations commission	A. 2012-2013	A. N/A	
	B. Rock Island's human rights commission should pursue the possibility of obtaining pro-bono legal assitance from attorneys of the John Deere Corporation to mediate fair housing disputes.	B. RIHRC	B. Obtain pro-bono legal counsel	B. 2012-2013	B. N/A	

14. Signature Page for Rock Island

As a recipient of CDBG funds and in order to comply with its certification to affirmatively further fair housing, the City of Rock Island, Illinois, has conducted an Analysis of Impediments to Fair Housing Choice to assess the availability of fair housing choice within the City of Rock Island. We have reviewed this Analysis and its recommended Actions and will support activities to assure nondiscrimination in the provision of housing and its accompanying transactions.

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Thomas Thomas, City Manager

_____

Date

15. Regional Fair Housing Action Plan

ABBREVIATION KEY:
CPED = Davenport Community Planning and Economic Development Department
DCRC = Davenport Civil Rights Commission
DHC = Davenport Housing Commission
MHA = Moline Housing Authority
MHRC = Moline Human Rights Commission
MP & DD = Moline Planning and Development Department
QCAIR = Quad Cities Alliance for Immigrants and Refugees
RIC & EDD = Rock Island Community and Deconomic Development Division
RIHA = Rock Island Housing Authority
RIHRC = Rock Island Human Rights Commission

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Proposed Investment	Date Completed
Impediment #1: Lack of decent affordable housing						
Increase the supply of affordable housing	A. Continue to make affordable housing investments in both impacted and non-impacted areas.	A. City councils	A. Number of units constructed or rehabilitated	A. Ongoing	A. $	
	B. Reduce or waive permit fees for area developers and non-profits seeking to build affordable housing.	B. City councils	B. Number of fee reductions or waivers	B. Ongoing	B. N/A	
	C. Increase outreach to landlords to get additional Section 8 participating landlords, particularly property owners with units located outside of Impacted Areas.	C. City councils, public housing authorities	C. Number of new Section 8 landlords	C. Ongoing	C. N/A	
	D. Secure funding or other resources (e.g., volunteer organizations) to provide needed accessibility modifications for tenants who cannnot afford them.	D. City councils	D. Number of units receiving accessibility	D. Ongoing	D. $	
	E. Increase the supply of accessible affordable units for people with physical disabilities.	E. Public housing authorities	E. Number of new accessible units	E. Ongoing	E. $	
	F. Continue administering/ seeking/applying for lead paint progams to reduce the associated hazards in the cities' affordable housing stock for protected classes.	F. CPED, MP & DD, RIC & EDD	F. Number of units remediated Number of applications submitted	F. Ongoing	F. $	
Impediment #2: Failure to identify affirmatively furthering fair housing choice as a project requirement and evaluation consideration in the CDBG application packet						
Increased consideration of affirmatively furthering fair housing choice when making CDBG funding decisions	Each of the three cities should amend its CDBG application packet to include affirmatively furthering fair housing choice as one of the cities' consideration when evaluting CDBG applications.	CPED, MP & DD, RIC & EDD	Application packet amended	2012-2014	N/A	

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Proposed Investment	Date Completed
Impediment #3: Lack of Affirmative Marketing Policy						
Create HUD-compliant documents	If applicable, the three cities should adopt affirmative marketing policies for their CDBG- and HOME-assisted housing with five or more units.	City councils	HUD-compliant affirmative marketing policy	2012-2014	N/A	
Impediment #4: Inadequate representation of the protected classes on local housing-related appointed boards and commissions						
Increase the number of members of the protected classes on appointed boards and commissions	Conduct outreach to members of the protected classes to recruit them to serve on housing-related boards and commissions when vacancies occur through resignation or term expiration.	City councils	Number of members of protected classes appointed to boards and commissions	Ongoing	N/A	
Impediment #5: Inadequate supply of affordable accessible residential units						
Increase the supply of affordable accessible units	A. Davenport, Moline and Rock Island should amend their rental property inspection checklists to include information on interior and exterior accessibility features of the properties. This information can then be used to construct a database of accessible rental properties. B. Davenport, Moline and Rock Island should continue to collaborate with social service agencies and disability advocacy organizations to identify funding sources to provide affordable accessible residential units for the protected classes, including City general funds, CDBG entitlement funds, and HOME entitlement funds.	A. CPED, MP & DD, RIC & EDD B. City councils, Davenport Community Services Division	A. Number of additional affordable accessible units B. Number of additional affordable accessible units	A. Ongoing B. Ongoing	A. $ B. $	
Impediment #6: Questionable access to public services and programs for persons with limited English proficiency						
Determine the need for a Language Access Plan (LAP)	Conduct Language Access Plan (LAP) four-factor analysis to determine if an LAP is needed.	MP & DD, RIC & EDD	Completion of LAP four-factor analysis	2013-2014	N/A	

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Proposed Investment	Date Completed
Impediment #7: Lack of or inadequate public transit						
Increase the frequency and extend the hours of public transit operations	A. Implement the transit-related actions steps in municipal comprehensive plans or other local plans to maximize the linking of affordable housing with access to employment centers, services, and amenities. B. Continue to work with regional transit agencies to provide the most optimal, economically feasible public transit options for minority and low and moderate income households. C. For any proposed multi-family residential development (greater than four units), during the project review process, municipalities should consier the proposed project's site location for proximity to and suitability and accessibility for public transit and consumer access to bus shelters. More specifically, review of new residential developments should include a plan review by the Bi-State Regional Commission (the metropolitan planning organization) for its comments on to what degree the proposed development could accommodate public transit.	A. City councils, CPED, MP & DD, RIC & EDD B. City councils, CPED, MP & DD, RIC & EDD, Citibus, MetroLINK, River Bend Transit, Iowa Quad Cities Transit C. CPED, MP & DD, RIC & EDD, Bi-State Regional Commission	A. Number of transit-related actions implemented B. Increased public transit options for minority and low/moderate income households C. Plans reviewed with Bi-State Regional Commission	A. Ongoing B. Ongoing C. Ongoing	A. $ B. N/A C. N/A	
Impediment #8: Lack of knowledge about fair housing laws and landlord/tenant rights and responsibilities						
Increase knowledge about fair housing laws and landlord/tenant rights and responsibilities	A. Continue/increase the number of public outreach efforts at which fair housing educational materials are presented and distributed, especially in neighorhoods that are home to the protected classes. Attendance and presentations by City officials may combat the perception that local governments are not concerned with the welfare of the protected classes. B. Add a fair housing tab to the menu bar on the home page of the City's website to facilitate easy access to fair housing information. C. Present fair housing workshops at meetings sponsored by Quad City Alliance for Immigrants and Refugees (QCAIR).	A. City councils, CPED, MP & DD, RIC & EDD, DCRC, MHRC, RIHRC B. City councils C. City councils, CPED, MP & DD, RIC & EDD, DCRC, MHRC, RIHRC, QCAIR	A. Number of public outreach efforts B. Fair housing tab added to City website home page C. Number of workshops attended	A. Ongoing B. 2013-2014 C. Ongoing	A. N/A B. N/A C. N/A	
Impediment #9: Ineffectual fair housing organization						
Improve operation of local human relations commissions	Conduct a summit meeting of Quad City area fair housing organizations to exchange information and ideas about "best practices" for addressing fair housing issues.	DCRC, MHRC, RIHRC	Summit meeting conducted	2013-2014	N/A	

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Proposed Investment	Date Completed
Impediment #10: Lack of employment opportunities for minority and low- and moderate-income households						
Increase jobs for minorities and low/moderate income households	A. Facilitate access to employment and job training programs. B. Continue to invest in economic development projects that create jobs for low- and moderate-income residents.	A. City departments B. City councils	A. Number of referrals B. Number of jobs created	A. Ongoing B. Ongoing	A. $ B. $	
Impediment #11: Cultural and language barriers for minority groups, including refugees and immigrants						
Assimilation of minorty groups into the community	A. Conduct fair housing education and outreach effots to explain renters' rights and responsibilities. B. Provide adequate resources for independent certified interpreters/translators for minorities, refugees and immigrants. C. Support the efforts of the Quad City Alliance for Immigrants and Refugees to build a community of refugees, immigrants and local citizens.	A. City staff, DCRC, MHRC, RIHRC B. City councils, CDBG C. City councils, City Staff, DCRC, MHRC, RIHRC, QCAIR	A. Number of outreach efforts B. Amount of funds provided C. Amount of funds provided, number of outreach efforts	A. Ongoing B. Ongoing C. Ongoing	A. $ B. $ C. $	
Impediment #12: Perception that some local governments are unfriendly toward minorities and cannot be trusted to protect minorities' best interests						
Improve relations between local governments and minorities	A. Increase outreach to minority groups to learn the bases for these perceptions. B. Attend community events in minority neighborhoods to meet residents and provide information on City programs and services. C. Establish and maintain ongoing contact with agencies that serve minority populations and persons with LEP. D. Provide and/or increase funding to support agencies that serve minority groups and the protected classes. E. Increase the number of members of the protected classes who are appointed to boards and commissions that deal with housing-related issues.	A. City councils B. City councils, City staff C. City councils, City staff D. City councils E. City councils	A. Number of outreach efforts B. Number of events attended C. Regular communications with agencies D. Amount of funds provided E. Number of members of protected classes appointed to boards and commissions	A. Ongoing B. Ongoing C. Ongoing D. Ongoing E. 2012 - ongoing	A. $ B. $ C. $ D. $ E. N/A	
Impediment #13: Concentrations of multi-family housing in Impacted Areas						
Increase supply of multi-family housing in non-Impacted Areas	A. Continue to invest CDBG and HOME funds to create new multi-family housing opportunities outside of Impacted Areas. B. Amend zoning maps to increase the amount of land zoned and available for multi-family housing development	A. City councils B. City councils, City staff	A. Number of multi-family units created B. Amended zoning map	A. Ongoing B. 2013-2014	A. $ B. $	

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Proposed Investment	Date Completed
Impediment #14: Members of the protected classes are usually overrepresented in public housing and Section 8 housing						
Increase supply of decent affordable private sector housing	A. Continue to invest CDBG and HOME funds for decent affordable housing. B. Continue to pursue other funding (LIHTC, Section 202, Section 811, et. al.) toprovide decent affordable housing for low-income and elderly residents and persons with disabilities. C. Increase outreach efforts to get additional Section 8 participating landlords, especially units located outside of Impacted Areas.	A. City councils B. City councils C. DHC, MHA & RIHA	A. Number of affordable units B. Number of affordable units C. Number of new participating landlords	A. Ongoing B. Ongoing C. Ongoing	A. $ B. $ C. $	
Impediment #15: Disproportionate impact of mortgage loan denial and high cost lending on the protected classes						
Eliminate discriminatory mortgage lending practices against minorities	A. Conduct mortgage testing. B. Continue fair housing education and outreach efforts to consumers and lending institutions to identify and eliminate illegal mortgage lending practices. C. Continue financial education courses for minority groups through Quad City Dollarwi$e and other means.	A. DCRC, MHRC, RIHRC, City staff B. DCRC, MHRC, RIHRC, lending institutions C. Quad City Dollarwi$e	A. Mortgage testing conducted B. Number of education and outreach efforts C. Number of courses presented	A. 2012-2015 B. Ongoing C. Ongoing	A. $ B. $ C. N/A	
Impediment #16: Discriminatory practices in real estate, mortgage lending and homeowner insurance practices						
Eliminate discriminatory real estate, mortgage lending and homeowner insurance practices	A. Secure funding to undertake the various types of testing/auditing needed to eliminate these practices. B. Continue fair housing education workshop presentations to REALTORS®, lending institutions, and insurance companies to help them identify and eliminate illegal practices.	A. City councils, qualified fair housing advocacy organizations B. DCRC, MHRC, RIHRC, REALTORS®, lending institutions, insurance companies	A. Amount of funding obtained B. Number of presentations made	A. Ongoing B. Ongoing	A. $ B. $	

Goals	Strategies to Meet Goals	Responsible Entities	Benchmark	Year to be Completed	Proposed Investment	Date Completed
Impediment #17: Inadequate minority representation in the membership of the Quad City Area REALTORS® Association						
Increase minority membership in the Quad City Area REALTORS® Association	Contact the Quad City Area REALTORS® Association and urge it to follow up with its Board of Director's stated intention to solicit more minorities for its membership rolls.	City councils, City staff, DCRC, MHRC, RIHRC, REALTORS®	Increased number of minority members in QCARA	2012-2015	N/A	
Impediment #18: Discriminatory language in the real estate advertisements in local newspapers and other real estate publications						
Eliminate discriminatory language in real estate advertisements	A. Initiate discussions with local REALTORS® and lending institutions to achieve more widespread publication of the HUD fair housing logo, the equal opportunity housing logo and equal opportunity lending logo in their real estate advertisements, especially in large display advertisements.	A. City staff, DCRC, MHRC, RIHRC, REALTORS®, lending instituitons	A. Discussions with REALTORS® and lending institutions held	A. 2013-2014	A. N/A	
	B. Contact publishers of local newspapers and other real estate publications to remind them of their responsibilities under federal, state and local fair housing laws regarding the publication of real estate advertisements. Request that they publish notices regarding their policies and legal obligations about publishing real estate advertisememts that are in compliance with federal, state, and local laws. Such notices should include a list of the federal, state, and local protected classes.	B. City staff, local newspapers	B. Publishers contacted	B. 2013-2014	B. N/A	

Appendix A: Stakeholder List

Contact Name	Title	Name of Organization
Jeff Anderson	City Planner	CDBG Program - City of Moline
Colleen Vollman	Grant Dev Coordinator	Community Development Division
Alan Carmen	Director	CDBG Program - Rock Island
Trisha Griffin	Grants & Website Coordinator	CDBG Program - Rock Island
Rita Pribyl	Senior Manager	CDBG Program - Davenport
Ryan Berger	Special Projects Coordinator	CDBG Program - Davenport
Bruce Berger	Development Senior Manager	HOME Program - Davenport
Ray Forsythe	Director	Planning & Development Dept - Moline
Shaw n Christ	Land Development Mngr	Zoning - Moline
Alan Carmen	Planning & Redevelopment Adminis	Planning Dept - Rock Island
Matt Flynn	Senior Planning Manager	Planning Dept - Davenport
John Afoun	Director	Public Housing - Moline
Susan Anderson	Director	Public Housing - Rock Island
Margaret Murphy	Assisted Housing Manager	Public Housing - Davenport
Susan Anderson	Director	Rock Island Housing Authority
Maureen Hart	Director	Project NOW
Elaine Winter	Director	Christian Care
Dr. David Deopre	Director	Douglas Park Place
Maya DeQuervain	Director	DeLeCerda House
Susan Anderson	Director	Cascade Gardens
Dr. David Deopre	Director	Robert Young Facilities
Kyle Rick	Director	ARC of Rock Island County
Sandra Walters	Director	Humility of Mary Housing
Gary Weinstein	Director	Transitions
Russ Upton	Director	Neighborhood Housing Services
Daw n Mutum-Plies	Housing Director	United Neighbors
Rod Jennings		Rebuilding Together of the QC
Kristi Crafton	Executive Director	Habitat for Humanity
Rick Schloemer	Director	Housing Cluster
Roger Pavey		Community Action of Eastern Iow a
Maureen Hart	Director	Project NOW
Sarah Castro	Grants and Development Coordinat	Community Health Care
Elaine Winter	Director	Christian Care
Dr. David Deopre	Director	Robert Young Facilities
Kyle Rick	Director	ARC of Rock Island County
Sandra Walters	Director	Humility of Mary Housing

Contact Name	Title	Name of Organization
Gary Weinstein	Director	Transitions
Russ Upton	Director	Neighborhood Housing Services
Dawn Mutum-Plies	Housing Director	United Neighbors
Rod Jennings		Rebuilding Together of the QC
Kristi Crafton	Executive Director	Habitat for Humanity
Rick Schloemer	Director	Housing Cluster
Roger Pavey		Community Action of Eastern Iowa
Maureen Hart	Director	Project NOW
Sarah Castro	Grants and Development Coordinato	Community Health Care
Elaine Winter	Director	Christian Care
Dr. David Deopre	Director	Robert Young Facilities
Kyle Rick	Director	ARC of Rock Island County
Sandra Walters	Director	Humility of Mary Housing
Gary Weinstein	Director	Transitions
Holly Nomura	Development Director	Salvation Army
Bill Steinhauser		Bethany for Children and Families
Sue Davison		Safer Foundation
Richard Connor		Youth Services Bureau
Kelly Thompson	Assistant Director	Humility of Mary Housing
Kelly Thompson	Assistant Director	Humility of Mary Shelter
Wendy Navarro		Family Resources
Sarah Oliver	Homeless Coordinator	VA Homeless Project
Marjor Gary Felton	Director	The Salvation Army
Liz Sherwin	Director	IL/IA Center for Independent Living
Susan Anderson	Director	Cascade Gardens
Dr. David Deopre	Director	Robert Young Facilities
Wendy Kelly	Director	The Project of the Quad Cities
Maya DeQuervain	Director	DeLeCerda House
Kyle Rick	Director	ARC of Rock Island County
Gary Weinstein	Director	Transitions
S.C.L Coordinator		Vera French
CFO		CASI
Barry Gallagher		Frontier Program
Xochi Pannell	Translation Services	Hispanic Advocate Project
Amy Rowell		World Relief
Michael D. Woods		Casa Guanajuato
Alfred Ramirez		QC Hispanic Chamber
Mike Reyes		LULAC
Leslie Kilgannon		Quad Cities Interfaith
Judith Morrell	Director	Davenport CRC
Greg Champagne	Community Economic Development	City of Rock Island/Human Relations Commission
Maureen Hart	Director	Project NOW
Brian Hollenback	Director	Rock Island Economic Growth Corp
Gretchen Martin-Farwell	Director	Prairie State Legal Services
Janelle Swanberg	Director	Help Legal Assistance
Jeff Nelson	Director	RI County Mass Transit District - METRO Link
Gena McCullough	Planning Director	Bi-State
Steve Swisher	Director of Business Development	River Bend Transit
Ron Gruenhagen	President	Quad City Rental Property Association
Walter Skovronski	President	Landlords of Davenport
Shane Johnson	Director	Quad City REALTOR® Association
Jerry Wolking	Commission Member	Citizens Advisory Committee

Contact Name	Title	Name of Organization
Deb Hinds	Commission Member	Citizens Advisory Committee
James Fobert	Fire Chief	City of Rock Island
Scott Harris	Police Chief	City of Rock Island
Frank Donchez	Police Chief	Davenport Police Department
Lynn Washburn-Livingston	Fire Chief	Davenport Fire Department
Cathy Voelkers	Chair	Davenport Citizens Advisory Committee
Margo Davis	President	Black Hawk Park West
Deb Kuntzi	President	Broadway Historic District Association
Mike Markell	President	Greenbush Neighbors
Dolores Richards	Vice-President	Highland Park Historic Neighborhood Association
Deb Hayes	Vice-President	KeyStone Neighborhood Association
Kim Callaway-Thompson	Acting President	West End Neighborhood Association
Connie Hayes	Executive Director	Community Caring Conference
Ed Hanna	President	Neighborhood Partners
Fred Harris		Ruhl and Ruhl REALTORS
Michael Cole		
Robert Jackson, Jr.	Chairman	Minorty Business Council
Russell Lee		Hispanic
Richard McAnally		John Deere
Joseph Obleton		
Larry Roberson		
Johnathan Tatum		
Rita Vargas		
Shelley Sheehy		River Cities Development Service
Pat Egly		
Sonia Cervantes		
Lien Truong		
Harvey Wiley	Social Worker	CASI
Sister Marilyn Schierbrock		CCC Food Pantry
Lupe Serrano		
Jim Andrews		
Mark Holloway		
Maria Christian		
Joe McLemore		
Shirley McLemore		
Clyde Mayfield	Commissioner	Davenport Civil Rights Commission
Michael Outlaw		
Jerry Overton		
Lee Williams		
Michelle Yates		
Troy Farley		John Deere
Helen Roberson	Commissioner	Davenport Civil Rights Commission
Pastor Travis Fisher		St. Mark Evangelical Lutheran Church
Sister Ruth E. Westmoreland	Manager	Café on Vine
Joyce Wiley		Quad Citians Affirming Diversity
Regina Tsosie		Native American Coalition of the Quad Cities
PJ Sloboan		Gold Coast Neighborhood Assocaiation
Scott Tunnincliff		Hilltop Association
Vera Kelly		NAACAP Branch #4019
Lorelei Pfautz	Director	Friendly House

Appendix B:
Summary of Zoning Ordinance Reviews

Davenport

Date of ordinance	1960	Comments
Residential districts and dwelling unit types permitted by right	R-1 - SF det	Wide variety of districts, much land zoned R-4. Areas zoned R-5 and up are minimal, scattered.
	R-2 - SF det, smaller lots	
	R-3 - SF det, duplexes on certain lots	
	R-4 - SF det, duplex	
	R-5 - SF, duplex, smaller lots	
	R-5M - R-4 uses plus duplexes without restriction and multi-family	
	5-6M - R-5 uses plus boarding houses, frats, sororities	
	R-7 - Mobile home park	
Smallest minimum residential lot size permitted	From imposing 10,000-20,000 SF in limited R-1 and R-2 areas, between 1,000 and 8,500 SF. Not prohibitive.	Allows ample opportunity for affordable housing development.
Alternative design	Regulates conversion from MF to condos/co-ops to control renter displacement, applies Traditional Neighborhood Development, established Attached Dwelling Overlay to allow for attached units in areas where they would otherwise not be permitted	Local policies will advance the expansion of housing opportunities for members of the protected classes.
Definition of family	One or more persons occupying a premises and living as a single housekeeping unit, whether or not related to each other by blood adoption or marriage, but no unrelated group shall consist of more than five persons, as distinguished from a group occupying a boarding house, rooming house or hotel	Definition somewhat limits the establishment of non-traditional households, such as those existing for economic reasons, but doesn't unlawfully limit group homes.
Treatment of group homes	Group homes of more than five persons are classified as an institutional use. This category also includes colleges, hospitals and transitional housing for the homeless, among other uses. Institutions are allowed by right beginning with R-5M through C-4 Central Business and may locate in other areas with special use permits. The institutional use category is currently on a six-month moratorium as staff reconsider regulations.	Revisions of the ordinance relating to institutional housing uses should incorporate fair housing principles for group homes for persons with disabilities, allowing those with up to eight residents to exist as single-family homes.

Moline

Date of ordinance	2006	Comments
Zoning districts and dwelling unit types permitted by right	R-2: SF det	Area zoned R-6 is relatively limited. Structure types permissive; exceptions made for MF and duplexes in R-2.
	R-4: SF det and att, duplexes, tow nhomes, garden apts	
	R-6: Above plus multi-level apartment buildings	
	R-7: Mobile home/park	
Smallest minimum residential lot size permitted	R-2: 6,000 SF	Minimums not prohibitive, and staff has the option to make setback req't exceptions
	R-4: 5,000 SF	
	R-6: 5,000 SF	
	R-7: 5,000 SF	
Alternative design	Includes provisions for some dense infill development to occur by right, administrative approvals for variances up to 10% on non-conforming lots and accessibility ramps that w ould otherw ise violate set-backs	These flexibilities increase opportunities for affordable and accessible housing development.
Definition of family	One or more persons related by blood, marriage or adoption together w ith such relative of the respective spouses w ho are living w ith the family in a single dw elling and maintaining a common household. Also not to exceed three persons not so related, provided that they live in a single dw elling and maintain a common household and single unit. Includes domestic servants and not more than one gratuitous guest (included in unrelated persons).	Definition limits the establishment of non-traditional households, such as those existing for economic reasons, but doesn't unlaw fully limit group homes.
Treatment of group homes	"Group residential" use, small (up to six) or large (more than six). Definition also includes convents, dorms, retirement homes. Group homes for disabled persons must request reasonable accommodation to avoid restrictions on the "group residential" definition, including 2,500-foot buffer and market research.	To eliminate unnecessary burden of reasonable accommodation request, carve out group homes for the disabled as a separate use.

Rock Island

Date of ordinance	2002	Comments
Zoning districts and dwelling unit types permitted by right	R-1 - SF det, unrelated group family R-2 - same, smaller lot minimum R-3 - R-2 uses plus two-family R-4 - R-3 uses plus boarding/lodging, conditional group homes R-5 - R-4 uses plus multi-family R-6 - R-5 uses plus housing designed for elderly R-7 - Mobile home parks	Largest portion of land is designated R-2. Multi-family districts R-5 and R-6 are scarce, scattered.
Smallest minimum residential lot size permitted	Ranges from N/A in dense, urban districts to 7,500 SF. Not prohibitive.	Minimum lot size does not present an obstacle to affordable housing development.
Alternative design	Permits rebuild infill activities on original building footprints, which has stimulated reinvestment in older neighborhoods. Issues "rebuild letters" to appraisers and banks to assist with mortgage approvals.	Policies on infill development will expand affordable housing opportunities.
Definition of family	One or more persons related to them by blood, marriage or adoption together with such relatives of the respective spouses who are living with the family in a single swelling and maintaining a common households. Also not to exceed three persons not so related, provided that such unrelated persons live in a single dwelling and maintain a common household and single housekeeping unit.	Allows exception for up to five unrelated, but requires 300-foot buffer between such uses (to prevent college student overcrowding)
Treatment of group homes	Group homes fall into the category of "care home," small (up to eight) or large (more than eight). Small care homes permitted by right in all residential districts. Large can be established in R-4 if approved by zoning appeals board.	These restrictions are consistent with fair housing standards, though for large care homes, the city should remove the buffer requirement.

Exhibit "A"

LICENSEE: Madison Construction, Inc. **– 15657 S. 70th Court, Orland Park, IL 60462**

LICENSING AGREEMENT

PARTIES: The LICENSOR is the City of Moline, Illinois, a municipal corporation, hereinafter called the CITY.

The LICENSEE is Madison Construction, Inc., 15657 S. 70th Court, Orland Park, IL 60462, hereinafter called the LICENSEE.

PREMISES: To be placed on City-owned properties located at 2500 and 2600 River Drive, Moline, IL, as depicted in greater detail on the attached Exhibit B.

USE: LICENSEE shall be allowed only to: Install signs at the NW corner of 2500 River Drive and NE corner of 2600 River Drive, park a temporary construction trailer on the SE corner of 2600 River Drive, and conduct soil boring tests on both properties as depicted on the attached Exhibit B.

INTEREST ACQUIRED: LICENSEE acquires only the right to: Install signs at the NW corner of 2500 River Drive and NE corner of 2600 River Drive, park a temporary construction trailer on the SE corner of 2600 River Drive, and conduct soil boring tests on both properties as depicted on the attached Exhibit B.

The Licensing Agreement is not assignable without prior written approval of the CITY and the LICENSEE shall give the CITY at least twenty-one (21) days notice in writing of the intention to assign. If assignment is made without notice and approval, the CITY, in addition to any remedies for breach hereof, may hold the LICENSEE responsible for all things to be done, fees to be paid and documents to be filed under the terms hereof. No possessory, possessatory, leasehold, ownership, or other property right or interest, except as specifically given herein, is conveyed to or acquired by the LICENSEE and the CITY and LICENSEE specifically disclaim any such acquisition or conveyance.

TERM: The first term of this Licensing Agreement is from October 9, 2012 to December 31, 2012. Succeeding years shall be from January 1 to December 31 and shall be automatically renewed, subject to LICENSEE′S submission of insurance certification and payment of fees. The CITY or the LICENSEE may terminate this Licensing Agreement by giving the other party 30 days written notice.

FEE: The annual usage charge is $30.00.

CONDITIONS: LICENSEE shall indemnify and hold the CITY harmless from all acts in connection with use or misuse of the premises, and from any/all accidents on the premises. LICENSEE shall procure a policy of insurance also naming the CITY as additional insured to protect the CITY from all damages to person or property on the premises resulting from accidents on the premises. Said policy or certificate of same shall be deposited with the CITY and shall remain in

force or be replaced with one in force prior to the effective date of any cancellation notice.

LICENSEE shall be the primary insured.

LICENSEE shall have the duty and responsibility to maintain the premises in a safe and neat condition, as determined by the CITY.

Upon termination of the Licensing Agreement, LICENSEE shall restore the premises to its condition prior to issuance of Licensing Agreement, or at City′s sole and exclusive option, said property on the premises shall become the property of the CITY - at the CITY's option.

Construction on the premises shall be done under the direction of the CITY. The CITY and its authorized agents shall have the right to enter upon the premises for municipal purposes.

LICENSEE:

By:_____
Licensee

Date: _____

CITY OF MOLINE, ILLINOIS:

By: _____
Mayor

Attest: _____
City Clerk

Approved as to Form:

_____
City Attorney

Exhibit "B"

Development Signs
Soil Boring Locations
Trailer Site
© 2012 Google
Google earth

Google earth
feet
meters
1000
300

AGREEMENT

THIS AGREEMENT is by and between City of Moline (hereinafter called OWNER), and _____ (hereinafter called CONTRACTOR).

OWNER and CONTRACTOR, in consideration of the mutual covenants hereinafter set forth, agree as follows:

ARTICLE 1 -- WORK

1.01. CONTRACTOR shall complete all Work as specified or indicated in the Contract Documents. The Work is generally described as follows:

The complete cleaning and repainting of the 750,000 gallon steel elevated tank in Moline Illinois on the interior wet surfaces, the spot cleaning and spot coating of the interior dry surfaces, and the spot cleaning and topcoating of the exterior surfaces with containment. Additional Work items include: repair of concrete and grout; installation of ground fault receptacle in valve vault, new cathodic protection system, new overflow flap gate, roof railing toe bars, roof manhole, and clog-resistant vent; modification of base cone ladder, support column ladder, top platform manhole, and access tube penetration through roof; removal of lugs; seal welding of patch plate in bowl; including other miscellaneous repairs and incidental items.

ARTICLE 2 – THE PROJECT

2.01. The Project for which the Work under the Contract Documents may be the whole or only a part is generally described as follows:

Repairing, Repainting the Interior Wet, Spot Coating the Interior Dry, and Topcoating the Exterior of One 750,000 Gallon Steel Spheroid Elevated Tank, "17th Avenue Tank," in Moline, Illinois.

ARTICLE 3 -- ENGINEER

3.01. The Project has been designed by Tank Industry Consultants who is hereinafter called ENGINEER and who is to act as OWNER'S representative, assume all duties and responsibilities and have the rights and authority assigned to ENGINEER in the Contract Documents in connection with completion of the Work in accordance with the Contract Documents.

ARTICLE 4 -- CONTRACT TIME

4.01. Time of the Essence

A. All time limits for Milestones, if any, Substantial Completion, and completion and readiness for final payment as stated in the Contract Documents are of the essence of the Contract.

4.02. Days to Achieve Substantial Completion and Final Payment

A. The Work on the 750,000 gallon steel elevated tank shall be Substantially Completed within ninety (90) calendar days after the date when the Contract Times commence to run as provided in paragraph 2.03 of the General Conditions, and completed and ready for final payment in accordance with paragraph 14.07 of the General Conditions within one hundred (100) calendar days after the date when the Contract Times commence to run.

4.03. Liquidated Damages

A. OWNER and CONTRACTOR recognize that time is of the essence of this Agreement and that OWNER will suffer financial loss and the OWNER'S ability to provide the public with a safe drinking water supply may be impaired if the Work is not completed within the times specified in paragraph 4.02 above, plus any extensions thereof allowed in accordance with Article 12 of the General Conditions. The parties also recognize the delays, expense, and difficulties involved in proving in a legal or arbitration proceeding the actual loss suffered by OWNER if the Work is not completed on time. Accordingly, instead of requiring any such proof, OWNER and CONTRACTOR agree that as liquidated damages for delay (but not as penalty) CONTRACTOR shall pay the OWNER seven hundred dollars ($700) for each calendar day that expires after the time specified in paragraph 4.02 for Substantial Completion until the Work is substantially complete. After Substantial Completion, if CONTRACTOR shall neglect, refuse, or fail to complete the remaining Work within the Contract Time or any proper extension thereof granted by OWNER, CONTRACTOR shall pay the OWNER one hundred twenty-five dollars ($125) for each calendar day that expires after the time specified in paragraph 4.02 for completion and readiness for final payment until the Work is completed and ready for final payment.

ARTICLE 5 -- CONTRACT PRICE

5.01. OWNER shall pay CONTRACTOR for completion of the Work in accordance with the Contract Documents an amount in current funds as follows:

A. For all Work, at the prices state in CONTRACTOR'S Bid, attached hereto as an exhibit.

ARTICLE 6 -- PAYMENT PROCEDURES

6.01. Submittal and Processing of Payments

A. CONTRACTOR shall submit Applications for Payment in accordance with Article 14 of the General Conditions. Applications will be processed by ENGINEER as provided in the General Conditions. **No separate payment shall be made for bonds, insurance, design, drawings, mobilization, containment of the cleaning and/or painting debris, or paint materials not incorporated into the Work.** Applications for Payment shall be submitted on a suitable form acceptable to ENGINEER and OWNER such as the form bound in these Contract Documents or AIA Documents G702 and G703.

6.02. Progress Payments; Retainage

A. OWNER shall make progress payments on account of the Contract Price on the basis of CONTRACTOR'S Applications for Payment each month during performance of the Work as provided in paragraph 6.02.A.1. below. All such payments will be measured by the schedule of values established in paragraph 2.07.A of the General Conditions (and in the case of Unit Price Work based on the number of units completed) or, in the event there is no schedule of values, as provided in the General Requirements:

1. Prior to Substantial Completion, progress payments will be made in an amount equal to the percentage indicated below, but, in each case, less the aggregate of payments previously made and less such amounts as ENGINEER shall determine, or OWNER may withhold, in accordance with paragraph 14.02 of the General Conditions.

a. 95% of Work completed.

6.03. Final Payment

A. Upon final completion and acceptance of the Work in accordance with paragraph 14.07 of the General Conditions, OWNER shall pay the remainder of the Contract Price as recommended by ENGINEER as provided in said paragraph 14.07.

ARTICLE 7 -- CONTRACTOR'S REPRESENTATION

7.01. In order to induce OWNER to enter into this Agreement, CONTRACTOR makes the following representations:

A. CONTRACTOR has examined and carefully studied the Contract Documents and the other related data identified in the Bidding Documents.

B. CONTRACTOR has visited the Site and become familiar with and is satisfied as to the general, local, and Site conditions that may affect cost, progress, and performance of the Work

C. CONTRACTOR is familiar with and is satisfied as to all federal, state, and local Laws and Regulations that may affect cost, progress, and performance of the Work.

D. CONTRACTOR has studied carefully all reports of explorations and tests of subsurface conditions at or contiguous to the Site and all drawings of physical conditions in or relating to existing surface or subsurface structures at or contiguous to the Site (except Underground Facilities) which have been identified in the Supplementary Conditions as provided in paragraph 4.02 of the General Conditions.

E. CONTRACTOR has obtained and carefully studied (or assumes responsibility for having done so) all additional or supplementary examinations, investigations, explorations, tests, studies, and data concerning conditions (surface, subsurface, and Underground Facilities) at or contiguous to the Site which may affect cost, progress, or performance of the Work or which relate to any aspect of the means, methods, techniques, sequences, and procedures of construction to be employed by CONTRACTOR, including applying the specific means, methods, techniques, sequences, and procedures of construction, if any, expressly required by the Contract Documents to be employed by CONTRACTOR, and safety precautions and programs incident thereto.

F. CONTRACTOR does not consider that any further examinations, investigations, explorations, tests, studies, or data are necessary for the performance of the Work at the Contract Price, within the Contract Times, and in accordance with the other terms and conditions of the Contract Documents.

G. CONTRACTOR is aware of the general nature of work to be performed by OWNER and others at the Site that relates to the Work as indicated in the Contract Documents.

H. CONTRACTOR has correlated the information known to CONTRACTOR, information and observations obtained from visits to the Site, reports and drawings identified in the Contract Documents, and all additional examinations, investigations, explorations, tests, studies, and data with the Contract Documents.

I. CONTRACTOR has given ENGINEER written notice of all conflicts, errors, ambiguities, or discrepancies that CONTRACTOR has discovered in the Contract Documents, and the written resolution thereof by the ENGINEER is acceptable to the CONTRACTOR.

J. The Contract Documents are generally sufficient to indicate and convey understanding of all terms and conditions for performance and furnishing of the Work.

ARTICLE 8 -- CONTRACT DOCUMENTS

8.01. Contents

A. The Contract Documents consist of the following:

1. This Agreement (pages 00510-1 to 00510-7, inclusive);

2. Performance Bond;

3. Labor & Material Payment and all other required Bonds;

4. Certificate of Insurance;

5. Supplementary Conditions;

6. General Conditions;

7. Specifications as listed in the table of contents of the Project Manual;

8. Drawings bound with the specifications;

9. Addenda (numbers ____ to ____, inclusive);

10. Exhibits to this Agreement:

    a. Notice of Award;

    b. Notice to Proceed;

    c. Bid Form (pages 00300-1 to 00300-17, inclusive);

    d. Documentation submitted by CONTRACTOR prior to Notice of Award;

11. The following which may be delivered or issued after the Effective Date of the Agreement and are not attached hereto:

    a. Written Amendments;

    b. Work Change Directives;

    c. Change Order(s).

B. The documents listed in paragraph 8.01.A are attached to this Agreement (except as expressly noted otherwise above).

C. There are no Contract Documents other than those listed above in this Article 8.

D. The Contract Documents may only be amended, modified, or supplemented as provided in paragraph 3.05 of the General Conditions.

ARTICLE 9 -- MISCELLANEOUS

9.01. Terms

A. Terms used in this Agreement will have the meanings indicated in the Supplementary Conditions, or if not contained in the Supplementary Conditions they will have the meanings indicated in the General Conditions.

9.02. Assignment of Contract

A. No assignment by a party hereto of any rights under or interest in the Contract will be binding on another party hereto without the written consent of the party sought to be bound; and, specifically but without limitation, moneys that may become due and moneys that are due may not be assigned without such consent (except to the extent that the effect

of this restriction may be limited by law), and unless specifically stated to the contrary in any written consent to an assignment, no assignment will release or discharge the assignor from any duty or responsibility under the Contract Documents.

9.03. Successors and Assigns

A. OWNER and CONTRACTOR each binds itself, its partners, successors, assigns, and legal representatives to the other party hereto, its partners, successors, assigns, and legal representatives in respect to all covenants, agreements, and obligations contained in the Contract Documents.

9.04. Severability

A. Any provision or part of the Contract Documents held to be void or unenforceable under any Law or Regulation shall be deemed stricken, and all remaining provisions shall continue to be valid and binding upon OWNER and CONTRACTOR, who agree that the Contract Documents shall be reformed to replace such stricken provision or part thereof with a valid and enforceable provision that comes as close as possible to expressing the intention of the stricken provisions.

9.05. Other Provisions

A. The CONTRACTOR agrees to protect, defend, and save harmless the OWNER and ENGINEER against any demand for payment for the use of any patented material, process, article, or device that may enter into the manufacture, construction, or form a part of the Work covered by this agreement; and the CONTRACTOR further agrees to indemnify and save harmless the OWNER and ENGINEER from suits or actions of every nature and description brought against them for, or on account of any injuries or damages received or sustained by any party or parties, by, or from the acts of the CONTRACTOR, his servants, or agents.

IN WITNESS WHEREOF, OWNER and CONTRACTOR have signed this Agreement in triplicate. One counterpart each has been delivered to OWNER, CONTRACTOR, and ENGINEER. All portions of the Contract Documents have been signed or identified by OWNER and CONTRACTOR or by ENGINEER on their behalf.

This Agreement will be effective on _____, 20____ (which is the Effective Date of the Agreement).

OWNER

City of Moline

By: _____

[CORPORATE SEAL]

Attest: _____

Address for giving notices

City of Moline

30 18th Street

Moline, Illinois 61265

(If OWNER is a corporation, attach evidence of authority to sign. If OWNER is a public body, attach evidence of authority to sign and resolution or other documents authorizing execution of Owner-Contractor Agreement.)

Designated Representative:

Name: _____

Title: _____

Address: _____

_____

Phone: _____

Facsimile: _____

CONTRACTOR

_____

By: _____

[CORPORATE SEAL]

Attest: _____

Address for giving notices

_____

_____

_____

License No.: _____
(Where applicable)

Illinois Agent for Service of Process:

_____

_____

(If CONTRACTOR is a corporation or partnership, attach evidence of authority to sign.)

Designated Representative:

Name: _____

Title: _____

Address: _____

_____

Phone: _____

Facsimile: _____

CITY OF MOLINE

CONTRACT CHANGE ORDER

Project No. : 1146 1158

Description: 12th Ave Retaining Wall Replacement

Contractor : Legacy Corporation

Date : 29-Aug-12

Change Order No. : 1 FINAL

Sheet 1 of 1

WORK DAYS		CONTRACT	
Contract	15	Original Contract	$49,880.00
Changes		Changes To-Date	$3,406.50
Adjusted		Adjusted Contract	$53,286.50
		% Change	6.8%

*	Item	Description	Quantity	Unit	Price	Addition	Deduction
		Utility Tax Funds					
	1	PRECAST MODULAR RETAINING WALL	56.3	SF	$35.00	$1,970.50	
	2	RETAINING WALL REMOVAL		LS	$7,645.00		
	3	SEEDING SPECIAL COMPLETE	-9.8	SY	$5.00		($49.00)
	4	TRAFFIC CONTROL		LS	$2,500.00		
*	5	SUMP PIT FOR WALL DRAINAGE & FABRIC	1	LS	$1,485.00	$1,485.00	
					Totals	$3,455.50	($49.00)
					Net Change	$3,406.50	

* Denotes new item added to contract

Previous Changes = $0.00 Tot. Changes To-Date = $3,406.50

REASON FOR CHANGE

Reconciliation Change Order

1 & 3, Adjustment for final field measurements.

*5, Stormwater required wall drainage to be contained and a french drain pit was installed to accept water from wall.

CHANGE ORDER APPROVAL

Contractor: [signature]

Date: 8-29-12

BUDGET SUMMARY

Utility Tax Funds

Budgeted=	$50,000.00
As-Bid=	$49,880.00
Change =	$3,406.50
Total=	$53,286.50

ENGINEER'S PAYMENT

Estimate No. 1 Final Date: August 28, 2012

Payable to:

Legacy Corporation
18619 43rd Avenue N
Port Byron, IL 61275

Project No.: 1158
Description: 3503 12th Avenue Retaining Wall

	ITEMS	AWARDED Quantity	Unit Price	Totals	QUANTITY TO DATE Prev. Auth.	Compl	Amount	FINAL CHANGES +/- Auth.	Amount Authorized
1	Precast Modular Retaining Wall	1,101 SF	$35.00	$38,535.00		1157.30	$40,505.50	56.3	$1,970.50
2	Retaining Wall Removal	1 LS	$7,645.00	$7,645.00		1	$7,645.00		$0.00
3	Seeding Special Complete	240 SY	$5.00	$1,200.00		230.2	$1,151.00	-9.8	($49.00)
4	Traffic Control	1 LS	$2,500.00	$2,500.00		1	$2,500.00		$0.00
	TOTAL			$49,880.00			$51,801.50	Subtot.	$1,921.50

	MISCELLANEOUS EXTRAS AND CREDITS					FINAL EXTRA'S Auth. ?	Amount
5	Sump Pit for Wall Drainage & Geotech Fabric	1 LS	$1,485.00	$1,485.00		1	$1,485.00
						Subtot.	$1,485.00
						TOTAL	$3,406.50

TOTAL MISC. EXTRAS & CREDITS	$1,485.00
TOTAL VALUE OF CPT. WORK	$53,286.50
DEDUCT RETAINAGE	$0.00
BALANCE DUE ON CPT. WORK	$53,286.50

MISCELLANEOUS DEBITS
Partial Payments No. _____

TOTAL DEBITS $0.00

NET AMOUNT DUE $53,286.50

FINAL PAYMENT APPROVAL

Contractor [signature] Date: 8-29-12

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CITY OF MOLINE

CONTRACT CHANGE ORDER

Project No. : 2-00252-00-RP

Description: 16th St. 12th-18th Avenue

Contractor : Langman Construction

Date : 29-Aug-12

Change Order No. : 1 and FINAL

Sheet 1 of 1

WORK DAYS		CONTRACT	
Contract	N/A	Original Contract	$548,377.61
Changes		Changes To-Date	$61,976.60
Adjusted		Adjusted Contract	$610,354.21
		% Change	11.3%

*	Item	Description	Quantity	Unit	Price	Addition	Deduction
		MFT FUNDS					
	1	TREE REMOVAL, OVER 15"	-57	UNIT	$15.00		($855.00)
	2	STUMP REMOVAL	-88.4	UNIT	$10.00		($884.00)
	3	GEOTECH FABRIC FOR GROUND STABILIZATION	230.6	SY	$0.70	$161.42	
	4	SEEDING SPECIAL COMPLETE	576.7	SY	$4.00	$2,306.80	
	5	INCIDENTAL HMA SURFACE	-5.0	TON	$200.00		($1,000.00)
	6	AGGREGATE BASE COURSE TYPE C, 6"	324.6	SY	$6.75	$2,191.05	
	7	AGGREGATE BASE COURSE TYPE B, 6"	-94.1	SY	$6.75		($635.18)
	8	PCC PAVEMENT, 8" W/INTEGRAL CURB	307.2	SY	$45.00	$13,824.00	
	9	PCC DRIVEWAY PAVEMENT	11.0	SY	$55.00	$605.00	
	10	PCC SIDEWALK 4"	898.9	SF	$5.00	$4,494.50	
	11	CLASS B PATCH	8.5	SY	$150.00	$1,275.00	
	12	PAVEMENT REMOVAL	216.8	SY	$10.00	$2,168.00	
	13	DRIVEWAY REMOVAL	-8.8	SY	$10.00		($88.00)
	14	SIDEWALK REMOVAL	-173.1	SF	$1.00		($173.10)
	15	ST. S, TY1, RCCP CL4, 12"	-3.4	LF	$48.00		($163.20)
	16	ST. S, TY2, RCCP CL2, 12"	-5.0	LF	$48.00		($240.00)
	17	TRENCH BACKFILL	28.1	CY	$20.00	$562.00	
	18	CATCH BASIN SPECIAL NO. 2	-1.0	EA	$4,000.00		($4,000.00)
	19	INLET DOUBLE TO BE ADJUSTED		EA	$500.00		
	20	STORM MANHOLE TO BE ADJUSTED	-1.0	EA	$300.00		($300.00)
	21	PIPE UNDERDRAIN COMPLETE	-367.7	LF	$11.00		($4,044.70)
	22	PIPE UNDERDRAIN, 4" IN ST. SEWER TRENCH	408.6	LF	$5.00	$2,043.00	
	28	HANDHOLE TO BE ADJUSTED	-2	EA	$100.00		($200.00)
	29	TEL. MANHOLE TO BE ADJUSTED	-2	EA	$300.00		($600.00)
	30	PAINT PAVEMENT MARKING LINE, 4"	993.9	LF	$0.35	$347.87	
	31	PAINT PAVEMENT MARKING LINE, 6"	-149	LF	$0.50		($74.50)
	32	PAINT PAVEMENT MARKING LINE, 12"	366.6	LF	$0.92	$337.27	
	33	PAINT PAVEMENT MARKING LINE, 24"	95.5	LF	$2.00	$191.00	
	34	TRAFFIC CONTROL COMPLETE		LS	$3,500.00		
*	35	STORM SEWER A-2000, 12"	388.60	LF	$48.00	$18,652.80	
*	36	CATCH BASIN SINGLE	1	EA	$2,500.00	$2,500.00	
*	37	ABANDON AND FILL STORM SEWER, 12"	15	LF	$12.50	$187.50	
*	38	FILL CATCH BASIN DOUBLE	1	EA	$500.00	$500.00	
*	39	CATCH BASIN DOUBLE	2	EA	$4,000.00	$8,000.00	
*	40	CATCH BASIN SPL NO. 2 MATERIAL ONLY	1	LS	$1,844.46	$1,844.46	
*	41	STORM SEWER DIP, 12"	9.1	LF	$73.00	$664.30	
*	42	CONCRETE COLLAR	1	EA	$275.00	$275.00	
*	45	REMOVE & REPLACE 4' STORM MANHOLE	1	EA	$4,500.00	$4,500.00	
*	47	MATERIAL COST FOR CATCH BASIN DOUBLES	1	LS	$3,200.00	$3,200.00	
		WPC FUNDS					
	23	SANITARY MANHOLE TO BE ADJUSTED	-2	EA	$300.00		($600.00)

	24	CLEANOUT TO BE ADJUSTED		EA	$100.00		
*	43	SAN. MH TO BE ADJUST W/ NEW F&G	2	EA	$785.00	$1,570.00	
		WATER FUNDS					
	25	VALVE BOX TO BE ADJUSTED	-2	EA	$0.01		($0.02)
	26	CURB BOX TO BE ADJUSTED	-7	EA	$0.01		($0.07)
	27	VALVE VAULT TO BE ADJUSTED	-1	EA	$300.00		($300.00)
*	44	VALVE VAULT TO BE ADJUST W/ NEW F & G	1	EA	$785.00	$785.00	
*	46	WATER MAIN REPAIR	1	LS	$2,948.40	$2,948.40	
					Totals	$76,134.37	($14,157.77)
					Net Change	$61,976.60	

* Denotes new item added to contract

Previous Changes = Total Changes To-Date = $61,976.60

REASON FOR CHANGE

See attached letter of explantions.

CHANGE ORDER APPROVAL

Contractor: Laura C. Blondell Date: 9/16/17

BUDGET SUMMARY

MFT FUNDS

BUDGETED=	$525,000.00
AS-BID=	$545,877.50
CHANGE =	$57,573.29
TOTAL=	$603,450.79

WATER FUNDS

BUDGETED=	$4,000.00
AS-BID=	$1,500.11
CHANGE=	$3,433.31
TOTAL=	$4,933.42

WPC FUNDS

BUDGETED=	$1,000.00
AS-BID=	$1,000.00
CHANGE=	$970.00
TOTAL=	$1,970.00

CITY OF MOLINE

CONTRACT CHANGE ORDER

Project No. : 1145

Description: 2012 Sealcoat Upgrade

Contractor : Langman Construction

Date : 6-Sep-12

Change Order No. : 1 and FINAL

Sheet 1 of 1

WORK DAYS		CONTRACT	
Contract	55	Original Contract	$419,810.00
Changes	14	Changes To-Date	$25,465.51
Adjusted	69	Adjusted Contract	$445,275.51
		% Change	6.1%

*	Item	Description	Quantity	Unit	Price	Addition	Deduction
		UTILITY TAX FUNDS					
	1	TREE REMOVAL, OVER 15"	6.4	UNIT	$20.00	$128.00	
	2	EARTH EXCAVATION	154.0	CY	$10.00	$1,540.00	
	3	EMBANKMENT	0.0	CY	$10.00		
	4	TRENCH BACKFILL	-98.0	CY	$12.00		($1,176.00)
	5	GEOTECHNICAL FABRIC GROUND STABILIZATIO	1.0	SY	$1.00	$1.00	
	6	SEEDING SPECIAL COMPLETE	511.0	SY	$1.50	$766.50	
	7	GRANULAR SUBBASE, RR1 6"	432.0	SY	$5.00	$2,160.00	
	8	AGGREGATE BASE COURSE TYPE B, 2"	432.0	SY	$2.00	$864.00	
	9	AGGREGATE BASE COURSE TYPE B, 6"	-565.0	SY	$4.00		($2,260.00)
	10	AGGREGATE BASE COURSE TYPE C, 6"	-20.0	SY	$5.00		($100.00)
	11	HMA SURFACE COURSE, 2"	-77.0	SY	$22.00		($1,694.00)
	12	HMA SURFACE COURSE, 2" SPECIAL	330.0	SY	$17.00	$5,610.00	
	13	AGGREGATE SHOULDER, 8"	29.0	SY	$15.00	$435.00	
	14	PCC PAVEMENT, 8" W/ INTEGRAL CURB	0.0	SY	$62.00		
	15	PCC PAVEMENT, 8"	346.0	SY	$62.00	$21,452.00	
	16	PCC DRIVEWAY PAVEMENT	-19.0	SY	$60.00		($1,140.00)
	17	PCC SIDEWALK, 4"	626.0	SF	$5.00	$3,130.00	
	18	DRIVEWAY REMOVAL	24.0	SY	$15.00	$360.00	
	19	SIDEWALK REMOVAL	120.0	SF	$2.00	$240.00	
	20	DETECTABLE WARNINGS	-12.0	SF	$30.00		($360.00)
	25	PIPE UNDERDRAIN, 4"	-753.0	LF	$4.00		($3,012.00)
	26	PIPE UNDERDRAIN, 4" IN STORM TRENCH	-11.0	LF	$2.00		($22.00)
	27	PRECAST MODULAR RETAINING WALL	64	SF	$35.00	$2,240.00	
	28	SEGMENTED CONCRETE BLOCK WALL	22	SF	$35.00	$770.00	
	29	PAINT PAVEMENT MARKING, LINE 4" WHITE	136	LF	$0.45	$61.20	
	30	PAINT PAVEMENT MARKING, LINE 4" YELLOW	-12	LF	$0.45		($5.40)
	31	PAINT PAVEMENT MARKING, LINE 6" WHITE	-77	LF	$0.65		($50.05)
	32	PAINT PAVEMENT MARKING, LINE 12" WHITE	-59.00	LF	$0.85		($50.15)
	33	PAINT PAVEMENT MARKING LINE 24" WHITE	-1	LF	$20.00		($20.00)
	34	TRAFFIC CONTROL	0	LS	$500.00		
		STORMWATER FUNDS					
	21	INLET SPECIAL TY A	-1.0	EA	$1,200.00		($1,200.00)
	22	CATCH BASIN SINGLE	0.0	EA	$2,500.00		
	23	CATCH BASIN DOUBLE	0	EA	$4,000.00		
	24	STORM SEWER, 12"	-110	LF	$65.00		($7,150.00)
*	37	UNCOVER MANHOLE AND POUR FILLET	1	LS	$938.91	$938.91	
		WATER FUNDS					
*	35	ADJUST WATER SERVICE	1	LS	$2,473.37	$2,473.37	
*	36	ADJUST VALVE VAULT	1	LS	$535.13	$535.13	

* Denotes new item added to contract			Totals	$43,705.11	($18,239.60)
Previous Changes =	Total Changes To-Date =	$25,465.51	Net Change	$25,465.51	

REASON FOR CHANGE

1-13 & 15-34, Adjustment for final field measurements.
14, Extended the pavement north of 44th Avenue.
35, Water Service to 1830 26th Avenue had to be lowered due to new elevation of roadway.
36, Valve Vault needed to be adjusted in pavement.
37, Pour fillet for manhole that was buried underneath old road.

CHANGE ORDER APPROVAL

Contractor:_____ Date:_____

BUDGET SUMMARY

UTILITY TAX FUNDS

BUDGETED=	$445,000.00
AS-BID=	$377,045.00
CHANGE =	$29,868.10
TOTAL=	$406,913.10

WATER FUNDS

BUDGETED=	$2,000.00
AS-BID=	$0.00
CHANGE=	$3,008.50
TOTAL=	$3,008.50

STORMWATER FUNDS

BUDGETED=	$53,500.00
AS-BID=	$42,765.00
CHANGE=	($7,411.09)
TOTAL=	$35,353.91

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CITY OF MOLINE

CONTRACT CHANGE ORDER

Project No. : 1156

Description: 2012 Mudjacking

Contractor : Midwest Mudjacking Inc.

Date : 12-Sep-12

Change Order No. : 1 and FINAL

Sheet 1 of 1

WORK DAYS		CONTRACT	
Contract	15	Original Contract	$15,000.00
Changes		Changes To-Date	$31,200.00
Adjusted		Adjusted Contract	$46,200.00
		% Change	208.0%

*	Item	Description	Quantity	Unit	Price	Addition	Deduction
	1	Mudjacking Complete	104	CY	$300.00	$31,200.00	
* Denotes new item added to contract					Totals	$31,200.00	$0.00
Previous Changes =		Total Changes To-Date = $31,200.00			Net Change	$31,200.00	

REASON FOR CHANGE

CHANGE ORDER APPROVAL

Contractor: Barry West

Date: 9-13-12

slk/1998

Budget Summary

Utility Tax

Budgeted=	$50,000.00
As-Bid=	$15,000.00
Change =	$31,200.00
Total=	$46,200.00