

June 18, 2020

Mr. Alan Quick
Managing Director
Department of Strategic Planning and Reporting
Illinois Housing Development Authority

Mr. Quick,

I am writing to request an extension of the deadline for submitting an affordable housing plan under the Affordable Housing Planning and Appeal Act. Due to the COVID-19 pandemic, the Village has had to prioritize essential Village business. For several months, Village staff has been working on staggered schedules and working remotely to protect both staff and residents. As a result, the Village has not completed updates to our 2016 Affordable Housing Plan and we will not be able to submit a plan prior to the June 28, 2020 deadline.

It is the Village's intent to submit by the end of this year. Last year, the Village contracted with consultants to update the Village's comprehensive plan. As part of the update, the Village Board is reviewing design standards and land use maps. The updated plan should help guide the Village towards a more diverse housing stock. Unfortunately, the comprehensive plan update has been delayed due to the lack of ability to hold public meetings. This is one of many Village initiatives that have been delayed in 2020.

Although our affordable housing plan has not been updated, we believe that we are making progress toward IHDA's standards for exempt local governments. Last fall the Village Board approved a development of attached single-family townhomes that may meet the IHDA's standard of affordability. Also, last fall construction was completed by the Illinois Department of Transportation on the Village's primary corridor, 159th Street. The 159th Street corridor is noted in our 2016 affordable housing plan as a potential multi-family zoning development area. We expect that the area will now be attractive to developers. Our updated affordable housing plan will reference these developments, along with new goals and data.

Thank you for your consideration,

Mayor George Yukich



VILLAGE OF HOMER GLEN
AFFORDABLE HOUSING PLAN

1. Introduction

On January 1, 2004, the Illinois Affordable Housing Planning and Appeal Act went into effect. This Act of the State of Illinois requires that all non-exempt municipalities prepare and adopt an affordable housing plan. The Village of Homer Glen is a non-exempt municipality by its percentage of housing that has been defined as affordable.

On December 2, 2013 Illinois Housing Development Authority sent a letter to the Village of Homer Glen informing the Village that it was a non-exempt community pursuant to Section 20(b) of the Act. Pursuant to Section 25 of the Act, therefore, the Village must prepare and approve an affordable housing plan by June 2, 2015.

2. Authority

In 2003, the Illinois General Assembly adopted Public Act 093-0595, the Affordable Housing Planning and Appeals Act, which became effective January 1, 2004. Amendments to Public Act 093-0595 were approved on June 28, 2004. Public Act 093-0595 and its amendments are codified at 310 ILCS 67/1 et seq. ("Act"). According to the Act, its purpose is to encourage counties and municipalities to incorporate affordable housing within their housing stock sufficient to meet the needs of their county or community. In addition, the Act provides a forum for affordable housing developers who believe they have been unfairly treated, to seek relief from local ordinances and regulations. 310 ILCS 67/10.

The Act contains three major provisions: (1) the Illinois Housing Development Authority ("IHDA") has been charged with determining those local governments that must prepare an affordable housing plan and those that are exempt; (2) the Act requires all non-exempt local governments to prepare affordable housing plans and adopt those plans prior to April 1, 2005; and (3) the Act provides an appeal procedure for aggrieved developers of affordable housing.

3. Goal/ 10% Affordable Housing

According to IHDA's calculations pursuant to Section 20(b) of the Act, as of the 2010 census, the Village of Homer Glen has a total of 255 affordable for-sale and rental units. Thus, IHDA has calculated that 3.3% of the Village's total housing units of 7717 are affordable. In order for the Village to reach exempt status under the Act, the Village

must have 10 percent of its total housing stock as affordable housing units, as defined by the Act. Assuming that the total housing unit calculation of 7717 were not to change, the Village needs a total of 772 affordable housing units to be exempt under the Act. After deducting the 255 existing affordable housing units calculated by IHDA from the total affordable housing units required to be exempt from the Act, **517 additional** affordable housing units are needed in the Village.

4. Affordable Housing Analysis

The Act requires that no-exempt municipalities set one of three goals for increasing the stock of affordable housing within its jurisdiction. The total number of housing units required for the Village of Homer Glen to become exempt from the Illinois Affordable Housing Planning and Appeal Act varies depending on which of the three goals is pursued. Those goals and their applicability to the Village of Homer Glen are shown in the following table of this Plan. The following data is provided for purposes of providing a statement of the total number of housing units required to become exempt.

Goal Options of the Illinois Affordable Housing Planning and Appeal Act	Total Number of Housing Units for Homer Glen to become Exempt:
* A minimum of 10% of all housing units within the community shall be affordable ; or	* 772 units
*A minimum of 15% of all new housing built in the community shall be affordable; or	* Varies; based on 30 new units per year; 4.5 of those units would have to be affordable.
*A minimum 3% increase in the overall percentage of affordable housing units in the community	* 232 units

5. Goals & Objectives

The best chance of achieving any of the above three options, and the goal of this plan would be to increase the number of affordable housing units in the Village of Homer Glen by 3% by the 2020 Census. This goal requires the addition of 232 dwelling units defined as affordable by the Illinois Affordable Housing Planning and Appeal Act. The Village of Homer Glen will make an effort to meet the goals by the policies outlined in this plan.

6. Identification of Land

Based on the Village of Homer Glen Comprehensive Plan there are areas identified within the Village's jurisdiction that may be suitable for multiple-family residential development. Any land use is subject to zoning reviews via established public hearing procedures. The development of these properties along with potential density bonuses for affordable housing should provide opportunities to increase the number of affordable housing units in the Village of Homer Glen. It is noted in the Comprehensive Plan under Housing and residential areas:

Goal: A housing stock and living environment that serves the needs and desire of local residents, attract new families to the community, and enhance the countryside character and environmental quality of the Village.

Objectives: Permit smaller lot residential developments in selected areas, provided they are characterized by generous open spaces and conservation design, and are compatible with nearby existing residential developments.

Consider a limited amount of high quality and compatible new townhomes and multifamily housing in a few selected locations; resident ownership should be strongly encouraged.

As outlined in the Comprehensive Plan the following properties are identified as potential multi-family zoning development areas:

- Along the east side of Parker Road, south of the Commonwealth Edison easement;
- North of the commercial area along 159th Street, east of Parker Road;
- South of the commercial area along 159th, west of Parker Road;
- South of the commercial area along 159th Street, east of Cedar Road;
- Along the north side of 151st Street, between Bell Road and the Commonwealth Edison easement;
- Along the south side of 151st Street, between the commercial area and the Commonwealth Edison easement;
- East of Greystone Dr. north of 143rd

The Village may also consider, on a case by case basis, new multi-family residences as part of mixed-use development projects in other appropriate locations with a change in zoning.

7. Incentives

The Village of Homer Glen is characterized partly by large homes on relatively large lots. If care is taken on their location and design, it is believed that accessory dwelling units built within the confines of existing single-family homes could be integrated into the community without adversely impacting the character of Homer Glen's neighborhoods while meeting the spirit and letter of the Illinois Affordable Housing Planning and Appeal Act. Public review of such units would be needed to limit the overall density of accessory units and to direct such units to larger homes on larger lots. Furthermore, it is believed that there would be demand for such units to accommodate extended family, caregivers, domestic staff, students, etc. The parameters of such policy may include:

- Affordable accessory units would be classified as special uses in all single-family residential zoning districts.
- Only those accessory units meeting the definition of affordable by the Illinois Affordable Housing Planning and Appeal Act would be classified as a special use.
- A density limit may be established within a block or subdivision to ensure that the character of the particular block or subdivision is not changed by the number of accessory units.
- Provisions such as title covenants or leasing restrictions may be established to ensure that the units remain affordable.
- Accessory units would be required to be built in full compliance with all applicable building and life/safety codes of the Village of Homer Glen.
- Exterior physical accommodations for accessory units would be required to be integrated into the architecture of the home to ensure that the single-family character of the home and area is not adversely impacted. For example, entrances and parking areas should not be readily identifiable as separate from those of the principal residence.
- It is the intent of this policy to maintain the low density characteristics of Homer Glen neighborhoods and only allow accessory units in larger homes on larger lots.

The Village may consider adopting and implementing, or otherwise facilitating, the following polices and incentives in the areas zoning and finance to encourage the development of affordable housing by both for-profit and non-profit developers in the Village:

Zoning:

- Amendments to the zoning map and comprehensive plan to allow the expansion of the number of multifamily locations for affordable housing development.
- Bonuses of other incentives regarding zoning requirements for developers who provide affordable housing, such as reduced parking lot size, setback or lot coverage requirements, or increased density.
- Fee reductions or waivers for zoning –related costs for those providing affordable housing.
- Expedited processing of zoning applications for those proposing to provide affordable housing.

Finance:

- Reduced building permit fees for affordable units.
- Cooperation with local businesses that wish to implement employer-assisted housing programs expanding housing options for the employer’s workforce, whether the employer is private or public sector. Examples of such programs may include down payment assistance, rental subsidies, or contracting with community based housing organizations to assist employees with housing options.
- Rehabilitation or redevelopment of existing structures for conversion to affordable housing or to maintain existing affordable housing by private or public or public sector entities.

8. Conclusion

Obviously, the Village cannot control market forces that affect the affordability of land and housing within the Village of Homer Glen, nor the income levels of households that serve as the benchmark for determining affordability. This is particularly true given the limited availability of sewer and water utilities. Because of these imponderables, as well

as the overall uncertainty of the real estate development industry and the changing regulatory environment in which such development occurs, it is not and cannot practically be a goal of this Plan to meet the target levels of affordable housing units stated above in any specific time frame. Rather, it is the objective of this plan that, by considering the goals set forth above, the Village will have created conditions amenable to ultimately achieving the stated affordable housing targets in the Village of Homer Glen in a manner that will not impact the health and safety capabilities of the Village and will protect and preserve the character and environment of the Homer Glen community.