



DEPARTMENT OF COMMUNITY DEVELOPMENT SERVICES

Grants Management Division

m e m o r a n d u m

TO: Bruce K. Walden, Chief Administrative Office

FROM: Elizabeth Tyler, AICP, City Planner/Director

DATE: March 18, 2004

SUBJECT: **City Comments on the Housing Authority of Champaign County “SECTION 8 ADMINISTRATIVE PLAN: Project Based Assistance Plan DRAFT 5”**

Description

On the agenda for the March 22, 2004 meeting of the Urbana City Council Committee of the Whole are City Comments on the Section 8 Administrative Plan: Project Based Assistance Plan Draft 5 to the Housing Authority of Champaign County. The comments are in response to the Housing Authority's requests for comments during their 30-day public comment period for their Section 8 Administrative Plan Project Based Assistance Plan for Lakeside Terrace, which extends from March 7, 2004 through April 5, 2004.

Issues

The issue is to determine if the comment letter, prepared by staff, contains all the comments that the City of Urbana desires to submit to the Housing Authority of Champaign County regarding the SECTION 8 ADMINISTRATIVE PLAN: Project Based Assistance Plan DRAFT 5.

Background

The Housing Authority of Champaign County has determined that it will be advantageous for the agency to convert Section 8 Tenant-Based Assistance vouchers to Project-Based Assistance. In the course of planning for the redevelopment of Burch Village and Lakeside Terrace, it has become evident that Project-Based Section 8 vouchers is one of the very few resources that will provide housing opportunities for extremely low income households and create public housing-type replacement units for both Burch Village and Lakeside Terrace over the long term.

Under rules and regulation of the U.S. Department of Housing and Urban Development, in order to convert Tenant Based Section 8 Vouchers to Project Based Assistance units, the Housing Authority of Champaign County is required to prepare a SECTION 8 ADMINISTRATIVE PLAN Project Based Assistance Plan.

Comments on the draft plan are due by 5:00 PM, April 5, 2004.

Attached is a draft letter to the Housing Authority of Champaign County that provides comments on the draft SECTION 8 ADMINISTRATIVE PLAN Project Based Assistance Plan.

Many of the comments prepared by staff are designed to make the Plan more complete by requesting that forms and information referenced in the Plan be included in the document. A number of comments were submitted that address the process for creating and allocating the Project Based Assistance vouchers. Specifically staff submits that the Plan should allow for more flexibility in the timing and allocation of the Project Based Assistance (PBA) resources. The Plan seems to envision a singular event for the allocation of the PBA vouchers. Staff would like to see the PBA vouchers allocated over time in order to address future housing needs and opportunities.

Options

1. Urbana City Council can approve the comment letter as prepared.
2. Urbana City Council can approve the comment letter with changes and additions.
3. Urbana City Council can withhold approval of the comment letter.

Fiscal Impacts

There would be no direct fiscal impact to the city budget, as no City funding has been allocated toward the SECTION 8 ADMINISTRATIVE PLAN: Project Based Assistance Plan. In fact, implementation of the Plan will help to address the Lakeside Terrace redevelopment costs.

Recommendations

Staff recommends that the Urbana City Council approve the comment letter for the SECTION 8 ADMINISTRATIVE PLAN Project Based Assistance Plan

Memorandum Prepared By:

**Bob Grewe, AICP
Manager, Grants Management Division**

Attachments:

(1) City of Urbana comment letter on the SECTION 8 ADMINISTRATIVE PLAN Project Based Assistance Plan DRAFT 5

(2) SECTION 8 ADMINISTRATIVE PLAN Project Based Assistance Plan DRAFT 5

cc:

Ed Bland

Matthew Hogan

March 18, 2004

Matthew Hogan
Housing Authority of Champaign County
205 West Park Avenue
Champaign, IL 61820

Dear Mr. Hogan:

On behalf of the City of Urbana, please accept the following comments on the SECTION 8 ADMINISTRATIVE PLAN Project Based Assistance Plan DRAFT 5.

The City of Urbana would like to see the Project Based Assistance (PBA) Plan be developed to provide a framework for subsequent Requests for Proposals for Section 8 Project Based Rental Assistance to be pursued. As it is, the document seems to provide a framework and evaluation criteria for a singular event to allocate all the available Project Based Assistance Rental resources. It would seem that a more strategic approach would be to request proposals from developers as specific development opportunities or housing needs are identified over a period of time.

Page 1 Program Set-Aside

This section provides information on the maximum amount of Project Based Assistance that could be provided. It would be helpful to indicate in this section how the HACC will determine the amount of Project Based Assistance that will be determined. For instance, might it be that the Housing Authority of Champaign County Board of Commissions will determine on an as-needed basis that amount of Project Based Assistance that will be available for a given program year.

Page 1 Agency Plan

Paragraph two (2) indicates that to assure consistency with deconcentration of poverty, all new Project Based Assistance agreements or Housing Assistance Payments, must be for units located in census tracts with poverty rates of less than 20%, unless there is an exception from HUD. It would be helpful to include information that identifies what census tracts in Champaign County meet this criteria. This information should be included in the Plan. Attached is spreadsheet

prepared by the Champaign County Regional Planning Commission that highlights census tracts with poverty rates that are less than 20%.

Page 1 Eligible Housing Units

The first paragraph seems to reference singular criteria for the allocation of the all the Projected Based Assistance resources and does not allow for other criteria, should affordable housing needs and opportunities change. This section should reference that the criteria in this plan will serve as a framework, but that specific evaluation criteria will be developed for each Request for Proposal process that the HACC pursues to obtain applications from developers for PBA.

Page 2 Notification of Program Availability

This section could be revised to reflect the concept of the Housing Authority of Champaign County conducting Requests for Proposals process, as deemed appropriate to meet affordable housing needs or to address strategic affordable housing opportunities. This would be preferred rather than the singular event that the current language seems to present.

Page 3 Owner Application Requirements

A copy of the application form, prescribed by the HACC should be included in the Plan.

Page 4 Evaluation Criteria

It would seem beneficial to provide more general evaluation criteria to create the framework for the Project Based Assistance Plan, with provisions to develop more specific evaluation criteria in the course of pursuing future Request for Proposals. This will provide the flexibility to consider new affordable housing opportunities.

Page 5 Housing Assistance Payments Contracts

Include HUD Form 52530-A in the Plan.

Page 6 Tenant Selection

It would seem that the provisions in first paragraph negatively impact tenants. The provision seems to imply that if you are tenant and your unit is selected for Project Based Assistance, you will be placed on the Section 8 waiting list. The impacted tenant should be given a choice to receive a tenant voucher immediately or be given the opportunity to reside in the new Project Based Assistance unit.

Page 6

Tenant Selection

Paragraph three (3) indicates that 75% of all new admissions on an annual basis must be at or below 30% of the median family income of the area. Is this a HUD requirement or a requirement set forth by the HACC? If it is not a HUD provision, are there Fair Housing concerns associated with such a provision?

Paragraph five (5) indicates that after one year of occupancy in a PBA unit, a tenant may move. There should be a provision for emergency situations if a tenant has to move prior to one year.

Paragraph six (6) references written tenant selection criteria approved as part of the original proposal for the PBA program. These tenant selection criteria should be part of the Plan.

Page 7 Other Policies

The policies of the Section 8 administrative plan related to the occupancy of Section 8 tenant-based assistance units should be part of the Plan.

Thank you in advance for your consideration of these comments.

Questions regarding this correspondence should be directed to Bob Grewe, Manager, Grants Management Division at 217.384.2441 or bpgrewe@city.urbana.il.us.

Sincerely,

Tod Satterthwaite, Mayor
City of Urbana

cc:
Edward Bland Jr.

Attachment:

1999 Persons for whom poverty status is determined
Source: U.S. Census Bureau, Census 2000, Summary File 3
(prepared by Champaign County Regional Planning Commission)

1999 Persons for whom poverty status is determined

Source: U.S. Census Bureau, Census 2000, Summary File 3.

Geography Identifier	Geographic Summary Level	Geography	Population for whom poverty status is determined: Total	Below Poverty Level	At or Above the Poverty Level	Percent of Population in Poverty
14000US17019000100	140	Census Tract 1, Champaign County, Illinois	467	159	308	34.0%
14000US17019000200	140	Census Tract 2, Champaign County, Illinois	1558	569	989	36.5%
14000US17019000300	140	Census Tract 3, Champaign County, Illinois	5917	3869	2048	65.4%
14000US17019000400	140	Census Tract 4, Champaign County, Illinois	4944	3978	966	80.5%
14000US17019000500	140	Census Tract 5, Champaign County, Illinois	4132	737	3395	17.8%
14000US17019000600	140	Census Tract 6, Champaign County, Illinois	3393	486	2907	14.3%
14000US17019000700	140	Census Tract 7, Champaign County, Illinois	3429	663	2766	19.3%
14000US17019000800	140	Census Tract 8, Champaign County, Illinois	2264	268	1996	11.8%
14000US17019000901	140	Census Tract 9.01, Champaign County, Illinois	4823	1043	3780	21.6%
14000US17019000902	140	Census Tract 9.02, Champaign County, Illinois	3054	256	2798	8.4%
14000US17019001000	140	Census Tract 10, Champaign County, Illinois	4494	446	4048	9.9%
14000US17019001100	140	Census Tract 11, Champaign County, Illinois	3676	100	3576	2.7%
14000US17019001201	140	Census Tract 12.01, Champaign County, Illinois	6666	372	6294	5.6%
14000US17019001203	140	Census Tract 12.03, Champaign County, Illinois	4893	57	4836	1.2%
14000US17019001204	140	Census Tract 12.04, Champaign County, Illinois	2736	75	2661	2.7%
14000US17019001205	140	Census Tract 12.05, Champaign County, Illinois	1870	78	1792	4.2%
14000US17019001206	140	Census Tract 12.06, Champaign County, Illinois	2040	0	2040	0.0%
14000US17019001301	140	Census Tract 13.01, Champaign County, Illinois	6346	404	5942	6.4%
14000US17019001302	140	Census Tract 13.02, Champaign County, Illinois	4095	170	3925	4.2%
14000US17019001400	140	Census Tract 14, Champaign County, Illinois	1527	232	1295	15.2%
14000US17019005100	140	Census Tract 51, Champaign County, Illinois	57	0	57	0.0%
14000US17019005200	140	Census Tract 52, Champaign County, Illinois	2361	1216	1145	51.5%
14000US17019005300	140	Census Tract 53, Champaign County, Illinois	3196	1160	2036	36.3%
14000US17019005400	140	Census Tract 54, Champaign County, Illinois	6931	978	5953	14.1%
14000US17019005500	140	Census Tract 55, Champaign County, Illinois	5042	575	4467	11.4%
14000US17019005600	140	Census Tract 56, Champaign County, Illinois	5598	1031	4567	18.4%
14000US17019005700	140	Census Tract 57, Champaign County, Illinois	7145	706	6439	9.9%

14000US17019005800	140	Census Tract 58, Champaign County, Illinois	4015	1047	2968	26.1%
14000US17019005900	140	Census Tract 59, Champaign County, Illinois	2486	1714	772	68.9%
14000US17019006000	140	Census Tract 60, Champaign County, Illinois	1626	519	1107	31.9%
14000US17019010100	140	Census Tract 101, Champaign County, Illinois	4938	734	4204	14.9%
14000US17019010201	140	Census Tract 102.01, Champaign County, Illinois	1143	56	1087	4.9%
14000US17019010203	140	Census Tract 102.03, Champaign County, Illinois	3520	406	3114	11.5%
14000US17019010300	140	Census Tract 103, Champaign County, Illinois	3223	170	3053	5.3%
14000US17019010400	140	Census Tract 104, Champaign County, Illinois	5153	363	4790	7.0%
14000US17019010500	140	Census Tract 105, Champaign County, Illinois	4123	300	3823	7.3%
14000US17019010601	140	Census Tract 106.01, Champaign County, Illinois	5046	211	4835	4.2%
14000US17019010602	140	Census Tract 106.02, Champaign County, Illinois	8060	585	7475	7.3%
14000US17019010700	140	Census Tract 107, Champaign County, Illinois	6649	220	6429	3.3%
14000US17019010800	140	Census Tract 108, Champaign County, Illinois	4391	209	4182	4.8%
14000US17019010900	140	Census Tract 109, Champaign County, Illinois	7643	298	7345	3.9%

lv:031604

SECTION 8 ADMINISTRATIVE PLAN Project Based Assistance Plan

General

The Housing Authority of Champaign County will provide Project Based Section 8 Vouchers in accordance with the provisions set forth in 24 CFR Part 983 and the guidance notice issued by the U. S. Department of Housing and Urban Development on January 16, 2001, the plan set forth herein and any future notices issued by HUD.

Program Set-Aside

The number of project based units that will be made available for the PBA Program will not exceed 20% of the total funding available under the Annual Contributions Contract (ACC) for tenant based assistance.

Up to 20% of any new funding increments may also be designated for project-based assistance provided that the funding is not designated for any other special purpose under the Housing Choice Voucher Program.

Agency Plan

Prior to entering into a Housing Assistance Payments Contract for Project Based Assistance, the HACC will determine that said contract is consistent with the Annual Agency Plan. Consistency with the Plan will be determined through the existence of circumstances indicating that project-basing of Section 8 assistance, rather than tenant-basing of the same amount of assistance, is an appropriate option and is consistent with the requirements of “deconcentrating poverty and expanding housing and economic opportunities”.

To assure consistency with deconcentration of poverty all new project based assistance agreements or Housing Assistance Payments contracts must be for units located in census tracts with poverty rates of less than 20%, unless the HACC secures an exception from HUD.

Eligible Housing Units

The HACC will provide project based assistance for new construction, rehabilitation and existing housing based on the criteria established further in this plan.

A housing unit will be considered an existing unit for purposes of the project-based voucher program, if, at the time of selection of the project, the unit requires a maximum expenditure of less than \$1,000 per assisted unit to comply with the Federal Housing Quality Standards (HQS). A housing unit will be considered a rehabilitation unit if the unit requires a minimum of more than \$1,000 per assisted unit to comply with HQS.

All proposed sites for rehabilitation and new construction must meet the site and neighborhood standards as defined in 24 CFR 983.6. Ineligible properties include the following:

- Housing for which the construction or rehabilitation is started before execution of the PBA agreement;
- Shared housing, nursing homes, and facilities providing continual psychiatric, medical, nursing services, board and care, or intermediate care;
- Properties within the grounds of penal, reformatory, medical, mental and similar public or private institutions;
- Properties located in the Coastal Barrier Resources;
- Properties located in areas having special flood hazards unless, it is located in an area participating in the National Flood Insurance Program.

Other federal requirements to determine eligibility of units include the following: prohibition from using PBA in units with other assistance under the U.S. Housing Act of 1937 within five years prior to PBA; minimizing displacement as defined in 24 CFR 983.10; Equal Opportunity and environmental requirements defined in 24 CFR 983.11 and Uniform Federal Accessibility Standards (UFAS) as defined in 24 CFR 8.23,

Income Mix

No more than 25% of the total units in a multi-family development or single-family properties may receive project-based assistance unless the assisted units are made available to elderly, disabled families, or families receiving supportive services.

This provision only applies to units assisted with project-based vouchers; there is no limitation on the income of other tenants in a PBA project or on households with tenant-based voucher assistance.

Notification of Program Availability

The HACC will accept applications for the PBA program on an as needed until such time that the full program set-aside has been placed under HAP contract.

The availability of project-based assistance will be advertised in a newspaper of general circulation once a week for three consecutive weeks. In addition, the HACC will conduct an owner's workshop to advise all interested parties of the program advantages, proposal requirements, evaluation criteria, tenant selection requirements and other general program requirements.

The following items will be included in the program advertisement:

- The deadline for submission of applications (not less than 60 days from the date of the announcement of availability).
- The total estimated number of units to be selected for assistance.
- The proposal evaluation criteria and timelines for selection of units.

Owner Application Requirements

Property owners responding to the notification of PBA funding must submit an application in the form prescribed by the HACC. The application must contain at a minimum the following information:

- A description of the housing including the number of units by size, bedroom count, bathroom count, sketches of the proposed new construction or rehabilitation, unit plans and estimated date of construction, if applicable. Amenities and other services should also be included in this description.
- Evidence of site control and for new construction, identification and description of the proposed site, site plan and neighborhood.
- Evidence of current zoning or evidence to indicate that rezoning is likely and will not delay the project.
- The proposed contract rent for the project including which utilities are included and for those utilities not included an estimate of average monthly costs for the first year of occupancy.
- A statement identifying all information related to displacement and relocation and identification of the responsible party that will carry out the relocation.
- Identification of the owner and other project principals, investors and other parties that have a substantial interest in the project and information on the qualifications and experience of the principal participants.
- A management and maintenance plan for the project.
- Evidence of financing to support the project.
- Other relevant information as determined by the HACC.

Program Selection Criteria

In addition to the criteria identified above under eligible units, the following threshold criteria must be met for an application to be considered for selection for the PBA program.

- The proposed project must not permanently displace any current tenants. Tenants may be temporarily relocated if necessary during rehabilitation of the unit at the expense of the owner.
- Rental levels must not exceed 110% of the Fair Market Rent or any approved exception payment standard and must be reasonable in relation to rents charged in the private market for unassisted comparable units.
- If a unit has been allocated a low income housing tax credit (IRS Code 42) but is not located in a qualified census tract, as defined in the law, the rent levels may be set at any level that is comparable with unassisted market rate units.

Following are the review criteria with associated point values that will be used by the HACC in the evaluation process of proposals received under the PBA program. There is no minimum passing score, nor a specific maximum score. Projects will be ranked by score and the highest ranked projects will undergo further review by the HACC. The selected projects must comply with all requirements set forth in this plan and all application HUD regulations.

Evaluation Criteria	Points
The proposed housing serves a target population: large families and/or disabled.	20
The proposal develops affordable housing through new construction in a mixed-income development.	40
The proposal submitted demonstrates a thorough, in-depth, well-planned project meeting all federal requirements and other eligibility criteria.	20
The applicant’s qualifications are appropriate for the project under consideration and firm financial commitments are adequately documented.	15
Rental subsidy is necessary for the viability of the project, management of the project is consistent with Section 8 requirements and the degree to which supportive services will be provided to the project.	5
TOTAL MAXIMUM POINTS	100

Prior to selecting the units for project based assistance, the HACC will make a determination that the application is responsive and in compliance with all selection criteria and is otherwise in compliance with HUD program regulations and requirements.

Establishment of Initial Rents

The Housing Authority will contract with a State certified appraiser and establish the rents in accordance with the provisions outlined above or seek approval of proposed rents from HUD for any the HACC owned units or HUD insured or co-insured mortgage.

Rehabilitation Work and New Construction Requirements

The owner will be required to prepare work write ups, construction specifications and plans upon request as determined appropriate by the HACC for rehabilitation and new construction projects. In addition, new construction projects require certification by a licensed design architect that the proposed new construction reflected in the working drawings and specifications complies with housing quality standards, local codes and ordinances and zoning requirements.

The owner is responsible for selecting a responsible contractor for rehabilitation and new construction and said contractor must provide the HACC with a non-debarment certification.

An agreement to enter in a Housing Assistance Payments (HAP) Contract will be executed upon satisfactory completion of all requirements identified above. Upon execution of the HAP, the construction period shall commence. The construction period shall be determined in accordance with the approved application and entered into the HAP agreement. The HACC will perform regular inspections during the construction period.

Upon completion of construction, the owner must provide the HACC with a certificate of occupancy and an owner certification pursuant to 24 CFR 983.104. The HACC will perform a final inspection prior to acceptance of the units and notify the owner of any deficiencies that may exist. The owner will be allotted a time extension if warranted or the HACC may reject any units that do not meet program requirements. If deficiencies are not cured in the agreed upon time or the owner fails to complete the work within the timeframe identified in the HAP agreement, the HACC may adjust the number of units to be placed under contract or not proceed with execution the HAP agreement.

Housing Assistance Payments Contract

Upon acceptance of the units by the HACC, a Housing Assistance Payments contract for Project Based Assistance for the Housing Choice Voucher Program will be executed in the format prescribed by HUD (52530-A).

The HACC will execute all PBA HAP contracts for a period of 10 years, subject to future availability of funding under the ACC with HUD. In addition, the HAP contract will permit two extensions for a period of five years each, based on a determination by the HACC that an extension is necessary to achieve long term affordability of the housing.

The HAP contract will provide for annual review of the rental amounts. Adjustments of rents will be subject to the annual adjustment factor provided that the rents charged for the PBA units are comparable to unassisted units in the rental market.

Special rent adjustments above the annual adjustment factor shall also be considered if it is determined that the rent continues to be reasonable. The owner shall be responsible for providing the HACC with market comparability data for any special rent increase that is requested.

The HACC will provide for vacancy payment under the PBA contract for up to 60 days provided that the vacancy is not the fault of the owner and the owner has taken every reasonable action to minimize the likelihood and extent of vacancies.

Tenant Selection

Tenants residing in units selected for the PBA program who otherwise qualify for Section 8 assistance will be placed on the HACC Section 8 waiting list. Owners may also refer applicants to the waiting list based on the HACC waiting list policies and selection criteria.

The HACC will maintain a single Section 8 waiting list for all tenant based and project based assistance. Applicants will be offered project-based assistance as they reach the top of the list and units are available. If an applicant rejects a PBA unit, they will remain in their same place on the waiting list for tenant-based assistance.

Admission to PBA units is subject to HUD requirements and 75% of all new admissions on an annual basis must be at or below 30% of median income of the area. The remaining 25% shall have annual incomes between 30% and 50% of median income. An exception to this admission criteria will be made for any continuously assisted family in the Section 8 tenant base program or the Public Housing program who wishes to locate to a PBA unit.

Owners must lease all assisted units to eligible families. Failure to do so will result in a reduction of the units under contract or other legal remedies including suspension or debarment from HUD programs.

After one year of occupancy in a PBA unit, a tenant may move. The HACC will convert PBA tenants wishing to move to Housing Choice Voucher participants by providing them with the next available voucher. Housing Assistance payments will continue on the PBA unit until the tenant vacates the PBA unit.

The owner is responsible for screening and selection of tenants in accordance with the written selection criteria approved as part of the original proposal for the PBA program. The owner must promptly notify the HACC in writing of the rejection of a family and the grounds for such decision.

If the owner rejects an applicant family who believes the rejection was unlawful discrimination, the HACC will assist the family or refer the family to the local Fair Housing Center or the HUD field office.

When a family is selected for a PBA unit, the HACC will brief the family and provide them with all required written information and documents identified in 24 CFR 983.203.

Ongoing Activities

The HACC shall administer the PBA program in accordance with all provisions under the Housing Choice Voucher program including issuing of monthly HAP payments, annual re-certification of household composition and income and annual inspection of all units to assure compliance with HQS.

The owner is responsible for managing the units in accordance with all requirements under the approved management plan and the Housing Assistance Payments contract. After initial occupancy, the owner must immediately notify the HACC of any vacancies. The HACC will refer a minimum of five families to the owner from its existing waiting list.

If the HACC has not referred an adequate number of applicant families to the owner within 30 days from notification of the vacancy, the owner may advertise and solicit applications from otherwise eligible families. Upon selection of an applicant, the owner will refer the applicant to the HACC for processing and briefing.

If a determination is made that the unit does not meet HQS requirements due to overcrowding as defined in the subsidy standards in the HACC Housing Choice Voucher program, then HACC will issue tenant based assistance upon availability.

Other Policies

All other policies stated in the Section 8 administrative plan related to occupancy of Section 8 tenant-based assisted units will apply to Project Based units as appropriate.



Notice for Public Comment

Section 8 Administrative Plan Project Based Assistance Plan

The Housing Authority of Champaign County (HACC) is in the process of amending the Section 8 Administrative Plan to include Project Based Assistance. At this time, the HACC is requesting written comments concerning the draft Project Based Administrative Plan. This draft document may be viewed at the locations below or a request to view an electronic version may be requested at kerri@hacc.net

It is the intention of the HACC to solicit proposals from developers and landlords for providing project based assistance in Champaign County. This policy provides for a competitive process to select housing units benefiting low-income households with an emphasis on new construction.

Please submit your written comments to one of the following addresses by April 5, 2004:

Mailing Address: Housing Authority of Champaign County
Attn: Kerri Forsyth
205 West Park Avenue
Champaign, IL 61820

Email Address: kerri@hacc.net

Locations where this Project Based Assistance Plan may be viewed:

**Housing Authority of Champaign County
Administrative Office
205 W. Park Avenue
Champaign, IL 61820**

**City of Champaign
Neighborhood Services Department
102 North Neil Street
Champaign, IL 61820**

**Champaign Public Library
505 S. Randolph
Champaign, IL 61820**

**Douglass Park Library Branch
504 E. Grove St.
Champaign, IL 61820**

**Urbana Public Library
201 S. Race Street
Urbana, IL 61801**

**City of Urbana
Community Development Department
400 S. Vine St.
Urbana, IL 61801**