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MIXED-INCOME HOUSING: A COLLABORATIVE STRATEGY TO SPARK URBAN ECONOMIC DEVELOPMENT

by DAINA STAIUNAS¹

Failing schools. Crime. Poverty. What was once a Petri dish for these urban diseases may also be, in a modified way, the cure: affordable housing. Mixed-income housing is the new strategy to attack urban poverty, and legal minds can play a role in this multi-disciplined effort.

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WHAT IS MIXED-INCOME HOUSING?

Mixed-income housing refers to housing developments that offer units based on an income scale.² The rental or ownership rates slide according to the incomes of low, moderate and market-rate households.³ The tenant base of mixed-income developments may vary by the number of income groups included; anywhere from 20 to 60 percent of the units may be designated for low-income households.⁴ Additionally, the median incomes of the wealthiest households can vary from 51 percent of the area median income to as high as 200 percent.⁵

The location of units within the development may also vary. In some developments, households from every income group may live on the same floor. By contrast, in other developments, floors, wings, or even entire buildings may be separated by household income.

The geographic location of mixed-income housing may also vary by city. For example, many of Chicago's mixed-income developments are built on the site of former housing projects such as Cabrini Green and ABLA.⁶ A major critique of such notorious projects was that they concentrated poverty in dense, urban areas. Mixed-income developments, by contrast, facilitate diversity that de-concentrates poverty and, hopefully, lessens the social problems associated with it.

IS MIXED-INCOME HOUSING JUST A TREND?

Though mixed-income housing has recently caught on throughout the country, the concept is not new. In 1992, the federal government first launched its mixed-income housing initiative via the Hope VI program.⁷ Increased federal spending suggests that mixed-income housing will be more than a fleeting trend.

Since its creation in 2009, the White House Office of Urban Affairs has issued directives to emphasize a multi-disciplinary approach to cultivating economic opportunity and development, which specifically includes mixed-income housing.⁸ Washington's directive has reached Chicago most recently by way of two federal programs: the Department of Housing and Urban Development

(HUD)'s Choice Neighborhoods Initiative,⁹ and the Education Department's Promise Neighborhood.¹⁰

These initiatives prompt federal agencies and local groups to work together "to develop more comprehensive responses that attempt to simultaneously address all of the interlocked challenges that plague low-income neighborhoods."¹¹ This collaborative approach comes in response to the failure of prior anti-poverty programs that tried to attack problems facing poor communities — education, unemployment, and crime — in isolation.¹²

HOW DOES MIXED-INCOME HOUSING BENEFIT FROM A MULTI-DISCIPLINE APPROACH?

The mixed-income housing theory takes the approach that, since several ills plague low-income communities, there is no single cure that will remedy the situation. There must be collaboration between the schools, local businesses, community members and police.

Money is typically what separates a "good" neighborhood from a "bad" one. Thus, economic opportunity is a vital prong of revitalization efforts. Under the mixed-income model, not only will the community benefit from crime reduction, youth enrichment programs and job training, but these improvements will also make the community more attractive for commercial retail investors. Local retailers, in turn, can reinvest their profits into the surrounding community by providing employment opportunities and increasing local tax revenue.

The remainder of this article will explore Woodlawn Park, a new Chicago mixed-income housing community. First, I will outline the background leading up to the project. Second, I will discuss its goals for both the neighborhood and its residents. Third, I will compare these goals with similar housing developments already existing in Chicago. Fourth, I will discuss the likelihood of success for Woodlawn Park. Finally, I will suggest examples of ways that attorneys can become involved in the development of mixed-income housing.

BEFORE WOODLAWN PARK

Woodlawn Park, formerly known as Grove Parc Plaza, is located on Cottage Grove between 61st and 63rd streets. Prior to its revitalization, Grove Parc

Plaza was in unspeakable condition. In 2008, roughly 99 of the 504 units were vacant, and those that were not condemned were virtually uninhabitable due to rat infestation and sewage that backed up into kitchen sinks.¹³

Sixty-four percent of Grove Parc Plaza residents had no education beyond high school; only 28 percent of the households reported employment income; and the Chicago Police Department designated the surrounding Woodlawn community as one of the three neighborhoods in the City most impacted by gang violence.¹⁴ The housing complex was truly, as HUD Secretary Shaun Donovan phrased it in a news conference with Chicago Mayor Rahm Emanuel, "Ground Zero for all of the challenges" Woodlawn faces: crime, foreclosed homes and vacant lots, unemployment and failing schools.¹⁵

In 2007, with HUD threatening to foreclose on Grove Parc's private owner, the Woodlawn Preservation & Investment Corp., residents invited Boston-based nonprofit development company Preservation of Affordable Housing, Inc., (POAH) to present a plan that would preserve the affordable units and revitalize the site.¹⁶

POAH works in major cities throughout the country to preserve and steward affordable rental housing. The organization surveyed Grove Parc Plaza residents to develop a demographic profile and to assess their housing and community needs. In partnership with the City of Chicago, the Jane Addams Hull House, the University of Chicago, Local Initiatives Support Coalition (LISC) Chicago and other community groups, POAH developed a comprehensive plan to transform Grove Parc Plaza into a mixed-income development named Woodlawn Park.¹⁷

THE VISION FOR WOODLAWN PARK

In accordance with POAH's redevelopment plan, the original Grove Parc site will be demolished and redesigned "to create a new mixed-income pedestrian friendly corridor connecting the University of Chicago on one end to the Chicago Transit Authority's 'El' Station on the other."¹⁸ A total of 965 units are planned — offering affordable units as before, but combining them with moderate/workforce rental, market-rate rental, and homeownership units.¹⁹ Some 65,000 square feet of retail and 40,000 square feet of recreational and community facilities are planned as well.²⁰

The goal is to build on the site's existing strengths of a prominent location on a major street (Cottage Grove) and close proximity to both public transportation (directly next to the Cottage Grove Green Line station) and the University of Chicago (a world-class research institution). Similarly, the project also calls for direct investment in the neighborhood's many foreclosed and abandoned properties.²¹ The revitalization includes constructing new units on currently vacant lots and aesthetic updates to existing building façades, with an emphasis on local hiring for these projects.

Following the multi-disciplinary approach favored by mixed-income housing advocates, the plan sets out concrete goals in a number of areas, including economic development, public safety and education and workforce development.

As to economic development, the lack of commercial infrastructure forces Woodlawn residents to do 70 percent of their shopping outside of the community.²² With a new wave of local economic development, about \$160 million could be captured by Woodlawn's own retail outlets.²³ Hand in hand with employment opportunities comes job training. According to the 2000 Census, Woodlawn's poverty rate is 45 percent.²⁴ The on-site community building center will partner with the University of Chicago and the local Kennedy King City College to implement a community jobs program that will offer job-training and certificate programs for residents.²⁵ Additionally, the partnership will link 140 young adults with summer employment.²⁶

Because public safety is integral to attracting investors and residents, the improved safety effort begins with enhanced Chicago Police Department enforcement of gang intervention programs, additional street and police "blue" lighting, police coordination with community watch groups and alternative recreational services for youth.²⁷ The presence of new youth programming and job training, in addition to the elimination of abandoned buildings (largely havens for drug activity), will also contribute to the public safety effort.²⁸

The job-training center will also serve as a community forum to address current education issues among school-aged residents.²⁹ Programs will emphasize to parents the importance of early childhood development programs in preparing their young children to start school, and local institutions will work to strengthen existing early learning programs.³⁰ Absenteeism is another problem than hinders school achievement.³¹ POAH's resident survey suggested that

failure to immunize children in a timely fashion was one leading cause of this problem.³² The job-training center will work with the nearby University of Chicago Hospital's community health initiative program to encourage timely vaccinations.³³ The communal space itself will be a resource center to disseminate information about local after-school, summer and college readiness programs.³⁴

While POAH's goals may seem idealistic at first glance, the organization laid out a very specific plan of projects and partnerships in order to address each of the social areas in need of improvement.³⁵ It also created a metric for assessing improvement.³⁶ Woodlawn Park intends to continue seeking feedback from residents and public records in the areas of student attendance rate, graduation, job placement, income, local school profiles and crime incidents.³⁷

POAH was awarded a \$30.5 million federal grant in August 2011³⁸ and is in the early stages of its plan for transforming the site.³⁹ Currently, two of the eleven residential buildings have been constructed.⁴⁰ These two buildings, named Woodlawn Center South, are three-story buildings that together offer 67 units.⁴¹ Woodlawn Center South is currently filled to capacity — with all market rate and subsidized units leased.⁴² POAH intends to demolish all of the old Grove Parc Plaza complexes by the end of 2013 and replace those units with an additional three-story, mixed-income housing unit.⁴³ Also in 2013, POAH will break ground on its senior building that will offer affordable housing to residents 55 years and older.⁴⁴

MIXED RESULTS? OLDER CHICAGO MIXED-INCOME HOUSING INITIATIVES

Woodlawn is not the only Chicago community experimenting with mixed-income housing. The Chicago Housing Authority's demolition of former housing projects has forced the relocation of thousands of residents.⁴⁵ As a result, various Chicago neighborhoods offer a glimpse of how mixed-income housing works in practice.

Since 2006, low-income renters and middle-class condo owners have shared Westhaven Park Tower on the Near West Side.⁴⁶ Built on the site of the former Henry Horner Homes, the development has been successful at attracting market-rate buyers with features like landscaped walkways, central air and views of downtown. Recent reports suggest that, contrary to its vision for socioeco-

conomic integration, this 113-unit complex is more akin to a Tower of Babel.⁴⁷ Antagonistic tensions have erupted over building security, domestic disturbance, rowdy guests and whether the lobby should be used as a place to congregate.⁴⁸

Some residents attribute the tensions to racial differences — the low-income residents are mostly black and the market-rate residents are “more racially diverse.”⁴⁹ Other residents say the tension stems from lifestyle differences.⁵⁰ Antwan Dobson, an owner and former condo president who is African-American, questions his decision to invest in the building: “I don’t think they intentionally oversold the place, I just think the adversities weren’t all thought out.”⁵¹

Will Woodlawn Park also be rife with adversity? One point to consider is that, unlike privately owned Woodlawn Park, Westhaven Park Tower is owned and operated by the Chicago Housing Authority (CHA).⁵² Perhaps private management at Woodlawn Park will facilitate a different environment through stricter building rules and security measures. Enforcement of these building rules may also force a system of resident accountability.

Privately owned mixed-income housing buildings may also offer additional amenities that CHA buildings lack. For example, Woodlawn Park will offer a variety of communal areas: outdoor patio seating, a community resource center, youth recreation facility and a playground. These are residential social forums that are alternatives to building lobbies. Indeed, no major incidents have occurred among residents in Woodlawn Park, as of yet, says Felicia Dawson, Woodlawn Park’s Director of Community Engagement.⁵³ Dawson notes that, “Property Management has done a good job of setting the tone for how people perceive the common areas, etc. Loitering, while it periodically happens, is dealt with swiftly.”⁵⁴

Additionally, only 34 of the 113 units in Westhaven are low-income CHA units, accounting for roughly 30 percent of the tenants.⁵⁵ Only four of those 34 units (3.5 percent of the total residents) contribute to “95 percent” of the problems, according to Rich Sciortino, Westhaven’s developer.⁵⁶ Woodlawn Park, by contrast, will have 43 percent of units at market-rate, 7 percent moderate/workforce rental units, and 50 percent low-income Section 8 units.⁵⁷ (As stated before, surplus housing will be built near Woodlawn Park to ensure all former Parc Grove residents have their affordable housing replaced.)

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This more even balance between market-rate and Section 8 units may eliminate feelings of marginalization. At the same time, this balance between the most and least affluent tenants leaves a small population of moderate/workforce units. This middle group's residential experience could take on an interesting dynamic. Thoughtful planning and community outreach are essential to this process, says Felicia Dawson, Woodlawn Park's Director of Community Engagement.⁵⁸ Acting with "intentionality" needs to start from the beginning, before a single resident moves in.⁵⁹

Dawson explains that one aspect of "intentionality" involves "setting the tone, developing a character and identity for both the building and the surrounding neighborhood."⁶⁰ Block club meetings, block parties, potluck dinners — Dawson identified these as opportunities that should be coordinated to allow Woodlawn Park residents to meet local homeowners and long-time residents.⁶¹ As part of her "Acquisition Community Engagement Strategy," Dawson encourages building residents to participate in larger community forums intentionally designed to welcome new and existing members to the community.⁶² Residents not only have a chance to meet neighbors, but fellow residents also get an opportunity to work together to solidify the character of that block, community, neighborhood, etc.⁶³

Residential communities that are devoid of this "intentional" and positive community interaction can be, in a word, dangerous. Wentworth Gardens, a CHA housing complex directly south from Cellular Field, home of the White Sox, became a haven for displaced housing project residents.⁶⁴ While the CHA does not offer Wentworth Gardens as a mixed-income building, it serves as a helpful example that residential tensions do not automatically abate when residents belong to the same race and socioeconomic status. Rather, Wentworth Gardens demonstrates that social problems may arise from housing integration among residents who share the same race and household income. People from housing projects such as Ida B. Wells, Cabrini Green and Parkway Gardens have moved into buildings with long-time Wentworth Gardens residents.⁶⁵

The longstanding residents have been less than welcoming toward their new neighbors. Willie J.R. Fleming, a former Cabrini resident and father of two, details the hostilities: "There have been beatings. Children have had their wrists broken. My daughter had a gun pulled on her in July because she's from Cabrini."⁶⁶

New residents attribute the violence to an attempt by Wentworth long-timers to preserve their turf and chase the newcomers out.⁶⁷ The CHA has visited the complex several times and issued a statement that it was working closely with management, the police and private security to keep the peace.⁶⁸

The CHA has not relocated all displaced residents to housing communities like Wentworth Gardens. In fact, the CHA has issued many residents rent vouchers for houses or assisted them with purchasing their own homes in various neighborhoods like Englewood, Woodlawn, Auburn Gresham, Roseland and Greater Grand Crossing.⁶⁹

Some communities are blaming the influx of former project residents for an increase in violence and crime.⁷⁰ Charlene Jones, a former Ida. B. Wells home resident and mother of three, resented that sentiment, stating: "There are a lot of stereotypes. They say people from public housing are messing up the community, but I believe most public housing residents know how to live and want a better life for their children so they teach them the right thing. Not everyone is a troublemaker."⁷¹

WHAT DOES THE FUTURE HOLD FOR WOODLAWN PARK?

Call me overly optimistic, but I think that Woodlawn Park will be a successful mixed-income housing development. The project's inherent structural support should prevent it from encountering, to the same degree, issues that other mixed housing communities have faced.

Woodlawn Park has a strong group of local community leaders who have pledged their support. Community members have supported the project.⁷² Local aldermen have garnered the support of Woodlawn residents and served as community liaison to City Hall. The late Bishop Arthur M. Brazier, a pillar of the community and former head of the Apostolic Church of God, was critical to preserving affordable housing in the area.⁷³

Moreover, the University of Chicago is committed to programs that will revitalize the surrounding communities of Washington Park and Woodlawn. In addition to detailing its campus police to the area, the University has contributed funding and leadership to Woodlawn Park's education and health initiatives.⁷⁴ Because of its implicit incentive to have stronger communities around

its own campus borders, the University will likely be a lasting partner in these redevelopment efforts.

Woodlawn Park's location may also contribute to its viability as a mixed-income success. Woodlawn may draw market-value households in the form of University of Chicago academics as well as progressives that may already be drawn to the existing racial and socioeconomic diversity of the Hyde Park area. At the same time, the commitment to retain current low-income residents may eliminate territorial tensions arising from cross-city pollination of former CHA residents.

WHAT ROLE CAN ATTORNEYS PLAY IN THIS COLLABORATIVE EFFORT?

Just as any community's economic development is not contingent on any single social area, people of all professions, including attorneys, can contribute their skills to the effort by assisting entrepreneurs and nonprofit organizations as well as direct affordable housing efforts.⁷⁵

First, attorneys can help small business owners not only navigate economic and legal channels, but also do it in a way that suits their financial capacities. For example, an attorney can help a new business acquire a tax-delinquent property at a below-market rate and then obtain a favorable loan to cover start up expenses.

Once businesses are established, attorneys are still needed. Entrepreneurs must ensure that their businesses comply with relevant municipal laws so as to avoid fines and fees for code violations. Entrepreneurs also need advice and direction for obtaining crucial operating necessities like insurance, grants, investors and city contracts.

Attorneys also help clients create standard recordkeeping procedures. Attorneys can draft contracts with vendors and also provide later counseling should their clients need to seek enforcement of these contractual obligations. Other areas for legal minds include petitions for zoning changes, liens on suppliers and organization for tax purposes.

Outside of the business scope, for example, a youth organization may want to expand its programs for inner city youth, but it fears liability for the actions of

its employees. An attorney can counsel the organization on employment practices and policies that may limit its exposure. Attorneys can also lend their time to local expungement seminars to help ex-offenders understand their legal rights and complete their paperwork for qualifying offenses.

In terms of direct assistance for housing efforts, attorneys can help tenant organizations apply for housing grants, as well as help them qualify for loans under local government programs. These grant funds may be the only money that backs housing rehabilitation in low-income neighborhoods that are mostly comprised of renters who have no collateral to secure a rehabilitation loan.

For those homeowners who are facing foreclosure, an attorney can step in to halt foreclosure procedures. This legal action will help the homeowners, but it will also help the community by stopping the increase in abandoned properties in low-income neighborhoods.

For example, one real-life attorney was instrumental in helping a local organization develop a program to provide emergency loans and support services to homeowners.⁷⁶ The attorney assisted the organization in persuading lenders to establish a pool of funds from which borrowers could withdraw.⁷⁷ The attorney then helped the organization appoint a board to oversee the loan program and establish eligibility criteria and loan terms.⁷⁸ Additionally, the attorney negotiated an agreement with the City of Chicago to provide continuing housing counseling.⁷⁹

CONCLUSION

It is only through a collaborative effort that we can revitalize Chicago. Mixed-income developments are a viable, collaborative tool for economic development. In addition to traditional community outreach professionals, legal minds can be involved in the development process. As professionals trained in issue-spotting, advocacy and conflict resolution, attorneys can bring the “intentionality” to these projects that will both cultivate and sustain the socioeconomic development that is lacking in our urban communities.

NOTES

- 1 Daina Staisiunas is a student at the Loyola University Chicago School of Law, Class of 2013. She earned her B.A. in Government from Dartmouth College in 2010.
- 2 *Preservation of Affordable Housing continues revitalization in Woodlawn with addition of 117 affordable apartments*, Preservation of Affordable Housing (POAH) press release, Jan. 18, 2012, <http://www.poah.org/pdf/RenaissanceClosing1-1612.pdf>.
- 3 *Id.*
- 4 Alex Schwartz & K. Tajbakhsh, K., *Mixed-Income Housing: Unanswered Questions*, 3 (2) CITYSCAPE 73 (1997).
- 5 *Id.*
- 6 "ABLA" is an acronym referring to four major public housing developments once operated by the Chicago Housing Authority. They have either been demolished or redeveloped as part of Roosevelt Square, a mixed-income community development. ABLA consisted of the Jane Addams Homes (A), the Robert Brooks Homes (B), Loomis Courts (L) and the Grace Abbott Homes (A). See *ABLA*, Wikipedia, <http://en.wikipedia.org/wiki/ABLA>.
- 7 *About Hope VI*, U.S. Department of Housing and Urban Development, http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/hope6/about.
- 8 *Neighborhood Revitalization Initiative*, Office of Urban Affairs, The White House, <http://www.whitehouse.gov/administration/eop/oua/initiatives/neighborhood-revitalization>.
- 9 HUD's Choice Neighborhoods Initiative links housing improvements with various public services to transform neighborhoods of extreme poverty with public and HUD-assisted housing into functioning, sustainable mixed-income neighborhoods with appropriate services, schools and access to jobs. *Revitalization of Severely Distressed Public Housing (HOPE VI)*, U.S. Department of Housing and Urban Development, <http://portal.hud.gov/hudportal/HUD?src=HUDprograms/choicehoods>.
- 10 The purpose of Promise Neighborhoods is to significantly improve the educational and developmental outcomes of children and youth in our most distressed communities, and to transform those communities through a variety of school and community partnerships. *Promise Neighborhoods Program Description*, U.S. Department of Education, <http://www2.ed.gov/programs/promiseneighborhoods/index.html>.
- 11 Ronald Brownstein, *Fallen Leaves: The latest effort to revive Chicago's Woodlawn neighborhood will test Obama's urban strategy*, NAT'L J., Oct. 14, 2011, <http://www.nationaljournal.com/columns/political-connections/in-obama-s-old-backyard-urban-renewal-goes-holistic-20111013>.
- 12 *Id.*
- 13 Binyamin Appelbaum, *Grim proving ground for Obama's Housing Policy*, BOSTON GLOBE, Feb. 27, 2008, http://www.boston.com/news/nation/articles/2008/06/27/grim_proving_ground_for_obamas_housing_policy/.
- 14 *Vision for People*, POAH Portfolio Illinois: Grove Parc-Woodlawn, POAH: Preservation of Affordable Housing 1-2, <http://poah.org/portfolio/illinois/GROVE%20PARC%20WOODLAWN/Vision%20for%20People.pdf>.
- 15 Fran Spielman, *Federal grant gives troubled Woodlawn a 'second chance'*, CHI. SUN-TIMES, Aug. 31, 2011, <http://www.suntimes.com/news/politics/obama/7389679-418/federal-grant-gives-troubled-woodlawn-a-second-chance.html>.
- 16 *Choice Neighborhood Project Summaries FY 2010/2011*, U.S. Department of Housing and Urban Development at 3, <http://portal.hud.gov/hudportal/documents/huddoc?id=CNFY2010-2011.pdf>.
- 17 *Id.*

- 18 *Choice Neighborhood Project Summaries FY 2010/2011*, *supra* note 16, at 3.
 19 *Id.*
 20 *Id.* at 4.
 21 *Id.*
 22 *Vision for Neighborhood*, POAH Portfolio Illinois: Choice Neighborhood Initiative, Grove Parc-Woodlawn, POAH: Preservation of Affordable Housing 2, <http://poah.org/portfolio/illinois/GROVE%20PARC%20WOODLAWN/Vision%20for%20Neighborhood.pdf>, 2.
 23 *Id.*
 24 *Id.*
 25 *Vision for People*, *supra* note 14, at 5.
 26 *Id.* at 6.
 27 *Vision for Neighborhood*, *supra* note 22, at 1.
 28 *Id.*
 29 *Vision for People*, *supra* note 14, at 3.
 30 *Id.* at 10–12.
 31 *Id.* at 12.
 32 *Id.*
 33 *Id.*
 34 *Id.* at 8.
 35 *Vision for Neighborhood*, *supra* note 22, at 1.
 36 *Vision for People*, *supra* note 14, at 13.
 37 *Id.*
 38 *Choice Neighborhood Project Summaries FY 2010/2011*, *supra* note 16, at 3.
 39 Interview with Felica Dawson, Director of Community Engagement – Chicago Area, Preservation of Affordable Housing, Inc. (Apr. 3, 2012).
 40 *Id.*
 41 *Id.*
 42 *Id.*
 43 *Id.*
 44 *Id.*
 45 Dahleen Glanton & Jeremy Gorner, *CHA: Most high-rise residents relocated in city*, CHI. TRIB., Apr. 14, 2011, http://articles.chicagotribune.com/2011-04-14/news/ct-met-cha-vouchers-20110414_1_cha-residents-cha-housing-high-rise-residents.
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 48 *Id.*
 49 *Id.*
 50 *Id.*
 51 *Id.*
 52 *Id.*
 53 Dawson, *supra* note 39.
 54 *Id.*
 55 Olkon, *supra* note 46.
 56 *Id.*
 57 *Grove Parc Plaza Redevelopment Overview*, POAH Portfolio Illinois: Grove Parc-Woodlawn, POAH: Preservation of Affordable Housing site at <http://poah.org/woodlawnchoice/index.htm> (last visited Sept. 2, 2012).
 58 Dawson, *supra* note 39.

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59 *Id.*

60 *Id.*

61 *Id.*

62 *Id.*

63 *Id.*

64 Don Terry, *Public-Housing Tenants Report Troubles at Their New Home*, N.Y. TIMES, Sept. 24, 2011, <http://www.nytimes.com/2011/09/25/us/cabrini-tenants-report-troubles-at-their-new-home.html>.

65 *Id.*

66 *Id.*

67 *Id.*

68 *Id.*

69 Glanton & Gorner, *supra* note 45.

70 *Id.*

71 *Id.*

72 *Long troubled Chicago South Side neighborhood will be revitalized*, POAH press release, Oct. 28, 2010, <http://www.poah.org/pdf/WoodlawnWallRaising.pdf>.

73 *Id.*

74 *Choice Neighborhood Project Summaries FY 2010/2011*, *supra* note 16, at 3-4.

75 For more on collaborative efforts relevant to the field of housing, see Ann Southworth, *Business Planning for the Destitute? Lawyers as Facilitator in Civil Rights and Poverty Practice*, 1996 WIS. L. REV. 1121 (1996) and Lan Cao, *The Diaspora of Ethnic Communities: Beyond the Pale?*, 44 WM. & MARY L. REV. 151 (2002-2003).

76 Southworth, *supra* note 75, at 1135.

77 *Id.*

78 *Id.*

79 *Id.*