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BUILDING AN AFFORDABLE ILLINOIS

# MANY HIGH-COST SUBURBS CONTINUE TO VIOLATE STATE AFFORDABLE HOUSING LAW

November 2025

# The state of Illinois has a severe housing affordability crisis.

A recent study shows that the state needs a substantial increase in housing supply—at least 227,000 units over the next five years—to improve housing affordability.[1] The Affordable Housing Planning and Appeal Act (AHPAA),[2] originally passed in 2003, aspires to address this affordability gap. Every five years, the state identifies the least affordable municipalities, which AHPAA defines as communities with less than 10% affordability. These municipalities, called "non-exempt local governments" or NELGs, are required to submit Affordable Housing Plans to the Illinois Housing Development Authority (IDHA).[3]

Since AHPAA's enactment, approximately 560 new affordable homes have been built in NELGs using the Low-Income Housing Tax Credit (LIHTC), the most common funding source for new affordable housing.[4] This falls far short of the thousands of units that need to be built to achieve the law's goals.[5]

To address the disconnect between AHPAA's vision and its impact, the Illinois General Assembly passed amendments in 2021 and 2023 to strengthen the law, closing a loophole that arguably excused home rule municipalities from compliance and expanding enforcement options.[6] The first round of Affordable Housing Plans submitted under the amended law were due on June 14, 2025.

This paper analyzes those Plans to determine the impact of the amendments[7] and concludes that:

1. **Over one-third of NELGs continue to disregard AHPAA's directive to submit an Affordable Housing Plan;**

2. **Less than a quarter of NELGs submitted Plans that complied with the law, as determined by IHDA;**

3. **IHDA's standards for determining compliance/non-compliance are**

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[1] Frank Manzo IV and Robert Bruno, *You Can't Buy What You Can't Afford: Illinois' Housing Shortage and Ways to Fix It*, (June 23, 2025), https://lep.illinois.edu/wp-content/uploads/2025/06/ilepi-pmcr-housing-shortage-and-affordability-in-illinois-final.pdf.

[2] 310 ILCS 67.

[3] 310 ILCS 67/25(a).

[4] The number was calculated using a previous analysis from Impact for Equity (see Martin Cozzola and Daniel Kay Hertz, *Building an Affordable Illinois: Achieving the Vision of the Affordable Housing Planning and Appeal Act*, (February 2025), https://impactforequity.org/report/building-an-affordable-illinois-achieving-the-vision-of-the-affordable-housing-planning-and-appeal-act/) that totaled 560 affordable units built in NELGs between 2008-2024 using 9% LIHTC awards. Housing built with the subsidy in Illinois is legally required to remain affordable for 30 years. A follow up analysis of IHDA's 9% awards in 2025 showed none went to NELGs (https://impactforequity.org/low-income-housing-in-less-affordable-communities/). This number does not account for any affordable units built using the Affordable Housing Special Assessment Program or built/preserved using 4% LIHTC awards. However, this report postulates that an estimate that includes such units would still fall significantly short of housing needed for every municipality to reach AHPAA's 10% minimum.

[5] *Id.*

[6] *See* COVID-19 Affordable Housing Grant Program Act, Pub. Act 102-0175, 2021 Ill. Laws 5419 & Public Act 103-0487.

[7] 2025 Affordable Housing Plan Submissions are available on IHDA's website at https://www.ihda.org/about-ihda/ahpaa/. Impact for Equity obtained written communications between IHDA and NELGs about their NELG status and Plan compliance through Freedom of Information (FOIA) requests to IHDA. These communications included IHDA's determination of which components were missing, resulting in non-compliance and are on file at Impact for Equity.

**inconsistent, unclear, and likely over-estimate actual compliance with AHPAA; and**

4. **Most NELGs have not made significant progress towards increasing the local affordable housing supply, nor do their Plans represent a meaningful step towards doing so, often citing lack of infrastructure, market conditions, or a general desire to preserve community character as barriers to development.**

# Overview of AHPAA

AHPAA sets a goal that every municipality in Illinois will maintain at least 10% of its total housing stock at affordable rates. The "planning" part of AHPAA requires municipalities that do not meet this minimum to submit an Affordable Housing Plan to IHDA, detailing steps the municipality will take to increase affordable housing stock. The "appeal" part of AHPAA creates a State Housing Appeals Board (SHAB) under IHDA and allows certain interested parties (developers, potential residents, or housing advocates) to file an appeal with the SHAB if they assert that an NELG impermissibly denied a proposal that includes affordable units because of the affordable components. Failure to submit a plan can be held against NELGs in an appeal.[8]

Municipalities where at least 10% of the housing stock is determined to be affordable are exempt from AHPAA. IHDA determines which municipalities are exempt by calculating the number of housing units in the municipality that are affordable to households earning up to 60% (rental) or 80% (owner-occupied) of the metropolitan area's median household income, as calculated by the U.S. Census Bureau, and dividing it by the total number of housing units in the municipality.[9]

In the Chicago metropolitan area, where 43 of the 44 NELGs in the current cycle are located, this means rental homes with monthly rents below $1,181 and owner-occupied homes with monthly costs (including mortgage, property taxes, etc.) below $1,575 are considered affordable. IHDA performs these calculations every five years and publishes a list of the municipalities that do not meet the 10% minimum affordability required by the law. These municipalities are NELGs and, as their name implies, are *not* exempt from AHPAA's planning requirements.

# Less Than 25% of NELGs Submitted Compliant Plans by the Deadline

AHPAA's current cycle began in December 2023, when IHDA notified 44 municipalities of their status as an NELG and the statutory 18-month deadline to prepare and submit their Plans.

[8] 47 Ill. Adm. Code 395.314(c).

[9] 310 ILCS 67/20(b).

***Table 1:***
***Status of Affordable Housing Plans for AHPAA-Subject Municipalities as of November 20, 2025***

| Submitted/Compliant | Submitted/Non-Compliant | Not Submitted |
|---|---|---|
| 10 | 18 | 16 |

Table 1 shows the breakdown of how many NELGs submitted Plans, as well as IHDA's determination of whether those plans properly complied with AHPAA's requirements.[10]

The vast majority of NELGs who failed to submit Plans also failed to submit Plans in previous cycles[11] and typically did not provide a reason to IHDA for not submitting.[12]

In the previous cycle, which began in 2018, many NELGs argued that home rule municipalities did not have to comply with AHPAA. However, the 2021 amendments clarified that AHPAA does apply to home rule municipalities. Moreover, half of the NELGs that did not submit Plans for this cycle are *not* home rule.[13]

It is also possible that the failure to submit a Plan is related to the capacity of smaller NELGs, which have fewer staff and financial resources. But this is similarly inconclusive: of the 15 NELGs with populations under 5,000 people, 11 submitted Plans (with four of those having populations under 2,000 people).

Equally concerning is that, as of this report's publication, IHDA has determined that well over half of the *submitted* Plans are non-compliant. The AHPAA statute requires that Affordable Housing Plans include the following elements:

1) a calculation of the total number of affordable housing units necessary for exemption from the law;
2) identification of lands most appropriate for affordable housing

[10] Three NELGs (Glenview, Tower Lakes, and Winnetka) submitted plans after the June 14 deadline. Winnetka disputed receiving the original notification of designation as an NELG and thus claimed additional time to submit, eventually submitting a plan on August 28, 2025. IHDA determined this submission to be non-compliant, and it is included in the "Submitted/Non-Compliant" table category. As of publication, Plans from Glenview and Tower Lakes are under review and have not been posted on IHDA's AHPAA web site or reviewed by Impact for Equity so are included in the "Not Submitted" table category. In addition, documents obtained through a Freedom of Information Act (FOIA) request to IHDA show that Geneva requested an extension to the end of the calendar year to accommodate its development of a new Comprehensive Plan. IHDA denied authority to grant such an extension. Impact for Equity also reached out to all NELGs to request a copy of their plans or, if no plan had yet been submitted, to request a timeline for submission. Lake Forest provided an update on actions taken since the 2018 cycle and shared its intent to submit an updated plan by the end of the calendar year. Third Lake responded that, as a small, rural municipality with extremely limited full-time staff, it struggled to devote time to analysis and creation of a plan. All three of these NELGs are included in the "Not Submitted" table category.

[11] NELGs that were required to but did not submit plans for either the 2018 or 2023 cycle include: Barrington Hills, Campton Hills, Elmhurst, Homer Glen, Inverness, Lake Forest, Oak Brook, Prairie Grove, and South Barrington. The following NELGs submitted plans in 2018 but not 2023: Geneva, Hawthorn Woods, Lily Lake, and River Forest. Third Lake was exempt in 2018 and thus not required to submit a plan.

[12] Impact for Equity submitted FOIA requests to IHDA on June 18, 2025; July 24, 2025; and August 19, 2025 requesting, among other things, any communications by NELGs asserting exemptions from the planning requirements. None of the documents IHDA shared were responsive to this request.

[13] Barrington Hills, Elmhurst, Homer Glen, Inverness, Lake Forest, Prairie Grove, and South Barrington.

development or rehabilitation (both owner-occupied and rental);
3) incentives the NELG can provide to attract affordable housing;
4) a description of barriers to or policies that do not affirmatively promote affordable housing developments;
5) plans and strategies to mitigate those barriers;
6) one of three goals (a minimum of 15% of all new development to be defined as affordable; a minimum of 5% increase in the overall percentage of affordable housing; or a total of at least 10% affordable housing);
7) a proposed timeline of implementation activities, which must begin within at least 24 months of plan adoption; and
8) for municipalities previously determined to be non-exempt, a summary of actions taken to implement the previous plan and a summary of progress made[14]

IHDA is required to notify an NELG if its Plan is not in "substantial compliance" with the above requirements.[15] IHDA provided written responses to NELGs listing the missing requirements that resulted in a finding of non-compliance.[16] However, a close look at the Plans and IHDA's responses reveal inconsistencies in how IHDA made these determinations.

## Standards for Plan Compliance Are Unclear

In comparing IHDA's determination of compliant and non-compliant Plans, there is no clear rubric of which statutory requirements needed to be included to achieve "substantial compliance" or what level of detail was necessary to satisfy each requirement. Some "compliant" Plans left out required elements in part or entirely. For example, IHDA deemed compliant Plans that either did not include a timeline[17] or included a generic timeline that noted continued implementation of Plan over a two to four year period or without specifics.[18] Similarly, IHDA approved eight Plans lacking the required summary of actions since the previous Plan.[19]

Some Plan requirements were interpreted differently by different NELGs. For example, the requirement to identify land appropriate for affordable housing development[20] was, in some cases, answered with specific parcels or land areas. In many other instances, though, Plans generically offered certain types of zoning areas (e.g., commercial districts, residential districts, etc.) without specific properties or locations. IHDA appeared to consider either acceptable.

Similarly, in describing barriers or constraints on an NELG's ability to create or preserve affordable housing,[21] the vast

[14] 310 ILCS 67/25.
[15] 310 ILCS 67/25(f).
[16] *Supra* note 12. Communications obtained through FOIA requests included IHDA's determination of which components were missing, resulting in non-compliance, and are on file at Impact for Equity.
[17] Bull Valley, Burr Ridge, and Kildeer.
[18] Libertyville, Northfield, Park Ridge, and Port Barrington.
[19] Bull Valley, Burr Ridge, Kildeer, Libertyville, Northfield, Park Ridge, Port Barrington, and Riverwoods.
[20] 310 ILCS 67/25(b)(ii).
[21] 310 ILCS 67/25(b)(iv).

majority of Plans listed generic constraints like market conditions, land prices, or being "land-locked" (i.e., not having land available for annexation). While AHPAA does ask for Plans to include some elements like market conditions and infrastructure limitations that are not necessarily within the NELG's control, the statute also asks for a list of "local government ordinances, including zoning and land use ordinances, local government policies or practices that do not affirmatively further fair housing," all of which are within an NELG's authority to change. IHDA, however, did not require inclusion of removable barriers in order to be deemed compliant.

The goal setting requirement also seems to have caused confusion, specifically the goal to increase affordable housing by 5%. Several NELGs interpreted this as a goal of a 5% increase over the existing number of affordable units,[22] a significantly smaller increase than what is stated in AHPAA, which is a 5% increase in overall percentage of affordable housing.[23] As an example, IHDA calculated that the Village of Riverwoods has 20 affordable housing units, for an overall affordable housing share of 1.5%. An increase of 5% over the number of affordable units calculated by IHDA would require an increase of only one affordable unit. To achieve a 5% increase in overall percentage of affordable housing, from 1.5% to 6.5%, the Village would need to add at least 65 affordable homes.[24]

However, IHDA still approved two NELGs that phrased the goal incorrectly.[25]

A particular area of ambiguity in what AHPAA requires and how IHDA is determining compliance relates to incentives to attract affordable housing[26] and plans or strategies to mitigate the barriers each NELG was supposed to identify (as noted above).[27] First, NELGs appeared not to understand how these two requirements are meant to be distinct, with many Plans either combining potential incentives and mitigation strategies (for example, zoning reform) or simply not including any strategies at all. Four NELGs explicitly conflate the two requirements, either by including a header for "incentives" but then referring the reader to a "plans/strategies" section or by creating an all-inclusive "incentives/plans/strategies" section in their Plans.[28]

Second, while a few Plans identified specific actions to be taken, the vast majority simply provided a list of common reforms, such as general zoning reforms, density bonuses, and fee reductions or other permitting process reform, that the NELG could consider at some future date, without a firm commitment or roadmap to do so. Several included the caveat that these incentives/strategies would be considered only "after a careful review to ensure that the public safety and health and the character and environment of the [municipality] will be protected and

[22] NELGs that phrased this incorrectly wrote a goal of "a 5% increase in affordable housing units in [municipality] over the number of affordable units calculated by IHDA."
[23] 310 ILCS 67/25(b)(vi).
[24] AHPAA 2023 Report of Non-Exempt Local Governments, https://www.ihda.org/wp-content/uploads/2023/12/2023-AHPAA-NELG-List.pdf.
[25] Kenilworth and Riverwoods.
[26] 310 ILCS 67/25(b)(iii).
[27] 310 ILCS 67/25(b)(v).
[28] Libertyville, Lincolnwood, Northfield, and Park Ridge.

preserved." IHDA appeared to accept both specific and generic strategies as compliant. In fact, of the eleven NELGs that submitted plans for both the 2018 and 2023 cycles, six plans simply restated the same incentives/strategies from their 2018 plans.[29]

Tables 2 and 3 reflect Impact for Equity's analysis of plan requirements for both compliant and non-compliant NELGs, as determined by IHDA.

***Table 2:***
***Required Components of Affordable Housing Plans Deemed Compliant by IHDA***

| | Included | Partial/ Generic | Not Included |
|---|---|---|---|
| **Affordable units needed for AHPAA exemption** | 10 | 0 | 0 |
| **Identification of land** | 5 | 4 | 4 |
| **Incentives** | 2 | 5 | 3 |
| **Barriers/Constraints** | 1 | 8 | 1 |
| **Mitigation plan/strategies** | 3 | 4 | 3 |
| **Goal** | 8 | 2 | 0 |
| **Timeline** | 3 | 4 | 3 |
| **Summary of previous actions** | 1 | 2 | 7 |

***Table 3:***
***Required Components of Affordable Housing Plans Deemed Non-Compliant by IHDA***

| | Included | Partial/ Generic | Not Included |
|---|---|---|---|
| **Affordable units needed for AHPAA exemption** | 17 | 0 | 1 |
| **Identification of land** | 11 | 6 | 1 |
| **Incentives** | 3 | 11 | 4 |
| **Barriers/Constraints** | 2 | 10 | 6 |
| **Mitigation plan/strategies** | 2 | 3 | 13 |
| **Goal** | 10 | 6 | 2 |
| **Timeline** | 2 | 1 | 15 |
| **Summary of previous actions** | 7 | 2 | 9 |

[29] Bull Valley, Frankfort, Glencoe, Lakewood, Wayne, and Western Springs.

# Many Plans Use Similar Language

A striking feature of submitted Plans is the amount of overlap in Plan elements and language. For example, many Plans listed the same general incentives for affordable housing, such as zoning reform, expedited permitting and/or fee reductions, density bonuses, property tax abatements, and exploring employer-assisted housing, without committing to specific action or analyzing any particular likelihood that such incentives are feasible in their communities or what their impact would be.

Many Plans also identified similar barriers or constraints to affordable housing development. A majority of Plans point to their municipalities being mostly "built out," with little available land to develop additional housing. This language could be a consequence of guidance from IHDA that states AHPAA "may have minimal practical impact on communities which are already 'built out.'"[30] This language could represent NELGs offering a reason they believe IHDA has accepted for why adding affordable housing is not possible.

Several Plans cite lack of public infrastructure, specifically public water and sanitation systems, as a significant financial barrier to affordable development that the municipalities alone cannot provide funding or sufficient fee reductions to overcome. A number of Plans also cite a need, either because of particular environmental restrictions (such as wetland requirements) or rural attributes, to balance affordable housing and open space. Four Plans cite a desire to maintain low-profile buildings "when compared to the existing tree canopy."[31]

However, there are a number of municipalities that make it clear that the lack of infrastructure is a designed barrier intended to maintain low density and single-family development. In fact, eight plans use identical or highly similar language:

> [Municipality's] infrastructure has historically developed in a manner consistent with the character and environment of [municipality] in order to protect the health and safety of its residents. In particular, streets, water lines, sanitary sewers, and storm water management facilities have been **designed and maintained to accommodate the relatively low-density development in [municipality].** Similarly, [municipality's] public works and public safety services and equipment have been developed, acquired, and maintained to address the **public health and safety needs that have arisen from the aforementioned character and environment of [municipality].** Establishing affordable housing in a manner inconsistent with such character **will be detrimental to [municipality's] environment and**

[30] Affordable Housing Planning and Appeal Act (AHPAA) 2023 Non-Exempt Local Government Handbook, https://www.ihda.org/wp-content/uploads/2025/03/2023-AHPAA-NELG-Handbook_Rev-03-06-2025.pdf .

[31] Deerfield, Glencoe, Lake Bluff, and Lincolnshire.

> **put at risk the public health and safety**.[32] [emphasis added]

Five NELGs qualify the identification of land and structures appropriate for affordable housing in their Plans as follows: "In identifying properties and structures that are most appropriate for affordable housing, it is important to note that 'appropriate' does not simply translate to those properties or structures that are vacant and undeveloped." Without further information, this language makes it impossible to determine when these NELGs *would* consider appropriate land for affordable development.

Thirteen NELGs cite their Comprehensive Plan as a guiding document on their Affordable Housing Plans. Illinois law permits, but does not require, municipalities to adopt an official comprehensive plan[33] to establish a long-term vision (typically 10-20 years) for a variety of community policies, including land use policies. While a few NELGs note that their Comprehensive Plan either includes a section on affordable housing or will be updated to do so, the majority appear to claim their Comprehensive Plan prevents them from considering affordability strategies. For example, at least five Affordable Housing Plans cite Comprehensive Plans that mandate lot size and primarily single-family development as unchangeable constraints necessary to "preserve the character of the community."[34] To the extent that these NELGs are open to denser construction, they cite affordable senior housing as a critical need. While "retirement housing" is a critical need stated in AHPAA, so is workforce housing,[35] and it is not clear in most plans how NELGs will attract or increase production of both. Indeed, there is a history of affluent communities preferring senior housing to satisfy affordable housing pressures over workforce or family housing, largely to avert perceived public safety issues or negative impacts related to increased populations of lower income and racially diverse households.[36]

## Questions about Affordability Definition

Nine Plans raise concerns about how IHDA calculates "affordability" under AHPAA.[37] Specifically, these NELGs take issue with their lack of control over "the income levels of households that serve as the benchmark for determining affordability. This is particularly true given the small size of [municipality] relative to the region against which it is measured for meeting affordable housing targets."

The first part of the objection presumably alludes to use of area median household income, a metric calculated by the U.S. Census Bureau and relied upon by IHDA

[32] Deerfield, Glencoe, Hinsdale, Kenilworth, Kildeer, Lake Bluff, Lincolnshire, and Long Grove.
[33] 65 ILCS 5/11-12.
[34] Bull Valley, Glencoe, Kenilworth, Lake Bluff, Winnetka.
[35] 310 ILCS 67/5(2).
[36] Jerusalem Demsas, *The dark side of senior housing*, The Argument (Aug. 25, 2025), https://www.theargumentmag.com/p/no-country-for-young-families.
[37] Bull Valley, Glencoe, Kenilworth, Lake Bluff, Libertyville, Lincolnshire, Long Grove, Park Ridge, and Wayne.

when evaluating affordability. The second part, referring to the size of the municipality relative to the region, seems to refer to the "metropolitan statistical area" (MSA) that the Census Bureau uses when determining the median household income that NELGs are measured against. For all the NELGs in the 2023 cycle, this is the Chicago-Naperville-Elgin MSA, an area that includes nine Illinois counties and four in Indiana, all of which are economically linked to the City of Chicago.

It is true that there is a significant disparity between the high incomes and market rate housing in NELGs and median household income for the larger MSA, such that providing affordable housing affordable at 60% of area household median income threshold could create a situation of housing at the "extremes" of affordability.

For example, the median household income in Kenilworth is more than $250,000,[38] significantly higher than the $78,790 median income for the Chicago-Naperville-Elgin MSA.[39] To move Kenilworth from its current affordable housing share of 1.6% to the 10% minimum under AHPAA would require the addition of an appreciable number of homes affordable to households with far less than half of the Village's median income. With a median home sale price of $2.2 million,[40] this could create a situation in Kenilworth where there is little "missing middle" housing, or homes affordable to households earning 60-120% of median household income.

This is an important dilemma that can and should be addressed, for example, with additional zoning reform. However, measuring affordability based on the existing incomes of extremely high-cost NELGs would ignore the state's broader affordability challenges and the specific need AHPAA identifies to build more housing for low-to-moderate income residents.

# Conclusions

This latest round of submitted Affordable Housing Plans makes it clear that AHPAA is still falling short of its goals.

***Widespread non-compliance requires additional enforcement measures and guidance***

A significant number of NELGs appear to be disregarding the law's mandate to submit an Affordable Housing Plan, with 14 not submitting Plans at all and at least three failing to do so by the statutory deadline. IHDA determined that 18 submitted Plans were non-compliant, a number that leaves out some Plans that exclude, or only partially include, legally required components.  This volume of non-compliant Plans illustrates that there is a real challenge in getting NELGs to submit robust Plans that meaningfully address affordability issues in their communities. Additional action must be taken to enforce compliance with AHPAA's requirement to submit an Affordable Housing Plan.

[38] Chicago Metropolitan Agency for Planning (CMAP) Community Data Snapshot for Kenilworth (July 2025), -https://www.cmap.illinois.gov/wp-content/uploads/dlm_uploads/Kenilworth.pdf.

[39] https://data.census.gov/profile/Chicago-Naperville-Elgin,_IL-IN-WI_Metro_Area?g=310XX00US16980

[40] https://www.realtor.com/realestateandhomes-search/Kenilworth_IL/overview.

Under the 2023 amendments, IHDA may refer non-compliant NELGs to the state's Attorney General; however, the law does not say what that referral should recommend, nor is it clear what capacity or interest the Attorney General's office has in prosecuting enforcement.[41] IHDA's handbook for NELGs states that "[NELGs] who fail to submit a plan or who submit a plan that was not prepared in good faith should expect to be reported."[42]

It is equally clear that NELGs need additional guidance on how to comply with the statute's requirements. While IHDA has the authority to establish clear and binding standards for complying with these requirements through rulemaking,[43] it has stated that "[IHDA] believes AHPAA provides clear direction on these items and any regulation it added would merely restate AHPAA."[44] IHDA instead provides non-binding suggestions through a handbook published for NELGs at the start of each cycle,[45] but this handbook primarily summarizes the statutory requirements. Given NELGs' inconsistent reading and application of these requirements, further guidance seems called for.

***Despite some progress, AHPAA is not on pace to meet its goals***

Since AHPAA's passage, a few NELGs have made strides in adding affordable units in their communities,[46] and several seem committed to at least enacting policies that will create favorable conditions to attract affordable development. However, many NELGs continue not to comply with even the letter of the law, let alone proactively pursue affordable development. Of the 44 NELGs, only two-thirds met the deadline to file Plans. For those NELGs that submitted Plans in both 2018 and 2023, over half submitted substantially the same Plan, with very little indication of any desire or political will to implement any of the incentives and strategies they repeatedly identified.

In addition, there remains a significant need for education within NELGs to combat traditional NIMBY arguments, such as preserving the character of the community and other coded language that strives to maintain exclusivity. It is particularly noteworthy how many NELGs raise lack of infrastructure as a barrier to affordable development. To be certain, this is a genuine constraint in some NELGs, particularly those that are especially small and rural. However, in larger, more affluent NELGs, which have greater capacity to design the public services they can provide, identifying inadequacy of existing infrastructure as a barrier to affordable development reads like a cynical attempt to maintain the exclusivity of their communities.

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[41] *Id.* The handbook states that "The Attorney General may seek to enforce the act via an action for mandamus or injunction or by means of other appropriate relief."
[42] *Id.*
[43] 310 ILCS 67/60.
[44] September 10, 2025 letter from Christina McClernan, IHDA General Counsel, in response to Impact for Equity's and partners comments to proposed amended regulations for the State Housing Appeals Board (47 Ill. Adm. Code 395.001, et al.).
[45] AHPAA 2023 Non-Exempt Local Government Handbook, https://www.ihda.org/wp-content/uploads/2024/04/2023-AHPAA-NELG-Handbook.pdf.
[46] Martin Cozzola, *Navigating the Evolution of Illinois' Affordable Housing Planning & Appeal Act* (January 2024), https://impactforequity.org/report/navigating-the-evolution-of-illinois-affordable-housing-planning-appeal-act/.

AHPAA can play an important role in expanding affordable housing in Illinois and especially in ensuring that all communities have a variety of housing options to accommodate all residents who live and work there. AHPAA's current cycle, however, reveals that there is much work to be done to standardize and strengthen the law's planning provisions so that NELGs have a clear path towards increasing affordable housing statewide.

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