Challenges to Desegregate Public Housing: Revisiting the Gautreaux Legacy

TSUKAMOTO Emi*

Introduction

Public housing in the United States, as stated by Susan J. Popkin, a nationally recognized expert on public and assisted housing policy, was regarded as one of the biggest and most visible failures among social welfare policies by the end of the 1980s. Nearly all of the residents of discriminatory policies and practices housing authorities. Even though the U.S. Supreme Court ruled in *Shelley v. Kraemer*¹ in 1948 that racially restrictive covenants were unconstitutional, discriminatory practices continued in the housing market. Likewise, Title VI of the U.S. Civil Rights Act of 1964 prohibited discrimination in the administration of federally assisted housing, ² but the Act did not have much impact on racial segregation within public housing. Chicago had become the capital of northern segregation by 1920 and public housing in the city, as the biggest project in both scale and impact, became a symbol of the failed housing program.³

^{*} Associate Professor of Nagoya College. She received her BA from SUNY Empire State College in New York and her MA and PhD from Nanzan University in Nagoya, Japan. The author would like to thank Jacob Peterson and the anonymous reviewers for their thoughtful advice and incisive comments.

^{1.} Shelly v. Kraemer, 334 U.S. 1 (1948).

^{2.} Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq.

^{3.} Susan J. Popkin, Diane K. Levy, and Larry Buron, "Has HOPE VI Transformed Residents' Lives? New Evidence from the HOPE VI Panel Study," *Housing Studies* 24, no. 4 (2009): 477–502; National Commission on Severely Distressed Public Housing, *The Final Report of the National Commission on Severely Distressed Public Housing: A Report to the Congress and the Secretary of Housing and Urban Development* (Washington, D.C.: The Commission, 1992); Susan J. Popkin, "Race and Public Housing Transformation in the United States," in *Neighbourhood Renewal & Housing Markets: Community Engagement in the US & UK*, ed. Harris Beider (Oxford and Malden: Blackwell Publishers, 2007), 138–62; Douglas S. Massey and Nancy A. Denton, *American Apartheid: Segregation and the Making of the Underclass* (Cambridge: Harvard University Press, 1993); Sudhir Alladi Venkatesh et al., *Chicago Public Housing Transformation: A Research Report* (New York: Center for Urban Research and Policy, Columbia University, 2004); Sudhir Alladi Venkatesh, *American Project: The Rise and Fall of a Modern Ghetto* (Cambridge: Harvard University Press, 2002);

After fifty-three years, the 1966 American Civil Liberties Union (ACLU) class action lawsuit of *Dorothy Gautreaux v. Chicago Housing Authority*, which was the first major public-housing segregation lawsuit in the U.S., finally reached a settlement agreement on January 23, 2019. The Chicago Housing Authority (CHA) was allowed proceedings to close the case by July 2024. Prior to the final agreement, the Gautreaux Assisted Housing Program (GAHP) was created to desegregate housing in Chicago as the initial result of the settlement of the Gautreaux case, which was brought to the U.S. Supreme Court in 1976 as *Hills v. Gautreaux*. The U.S. Department of Housing and Urban Development (HUD), founded in 1965, was also responsible for civil rights violations such as the tenant and site selection policies because the HUD supported the CHA financially.

The Gautreaux case began in the same year that Dr. Martin Luther King Jr. moved into an apartment in the North Lawndale community of Chicago in order to help lead the Chicago Freedom Movement, also known as the Chicago open housing movement, supported by the Chicago-based Coordinating Council of Community Organizations and the Southern Christian Leadership Conference. The Chicago Freedom Movement was an extraordinarily ambitious civil rights campaign that lasted from 1965 to 1966, fighting for open housing and racial justice. Consequently, the House of Representatives passed the Fair Housing Act of 1968, which prohibited discrimination in the sale or rental of housing nationwide, less than a week after the assassination of Dr. King. However, Black communities remained segregated.

Alexander Polikoff, Waiting for Gautreaux: A Story of Segregation, Housing, and the Black Ghetto (Evanston, IL: Northwestern University Press, 2006), 36.

^{4.} Gautreaux v. Chicago Housing Authority, 265 F. Supp. 582. (N. D. 11.1967).

^{5.} Chicago Housing Authority, "Gautreaux Settlement," https://www.thecha.org/residents/public-housing/gautreaux-settlement (accessed May 4, 2020); Lolly Bowean, "Federal judge approves settlement agreement, ending longest-running housing discrimination case in the country," *Chicago Tribune* (January 23, 2019), https://www.chicagotribune.com/news/ct-met-gautreaux-case-settled-20190123-story.html (accessed May 4, 2020).

^{6.} Hills v. Gautreaux, 425 U.S. 284 (1976); Alexander Polikiff, "Hope VI and the Deconcentration of Poverty," in From Despair to Hope: Hope VI and the New Promise of Public Housing in America's Cities, eds. Henry G. Cisneros and Lora Engdahl (Washington, D.C.: Brookings Institution Press, 2009), 68.

^{7.} Polikoff, Waiting for Gautreaux, 47-48.

^{8.} The Fair Housing Act of 1968 (Title VIII of the Civil Rights Act of 1968, 42 U.S.C. 3601–3619) prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status, and disability. U.S. Department of Housing and Urban Development, "History of Fair Housing," https://www.hud.gov/program_offices/fair_housing_equal_opp/aboutfheo/history (accessed May 15, 2020).

^{9.} U.S. Department of Housing and Urban Development, "History of Fair Housing"; Polikoff, *Waiting for Gautreaux*; Massey and Denton, *American Apartheid*.

The sociologists Douglas Massey and Nancy Denton claim that the word "segregation" disappeared from American vocabulary during the 1970s and 1980s despite the fact that *de facto* racial residential segregation in modern times is the principal structural feature of American society and it has been a breeding ground for persistent racial discrimination and prejudice.¹⁰ On the other hand, William J. Wilson, a Harvard professor of sociology, emphasizes a structural transformation of inner-city economies as a primary cause of the persistent urban poverty, which limits the choice of housing, hence segregation.¹¹

Liberal social scientists, who critically depict the core values of American society, claim that racial segregation is evidently unconstitutional, but mainstream society does not acknowledge those claims and is reluctant to work on the issues in politics and economic activities. With a focus on the culture of segregation that Massey and Denton argue in a previous article, the author revealed how much of an effect the GAHP had on desegregation in the housing market in America and how the GAHP inspired consecutive housing programs across the country in a previous issue of the *Nanzan Review*. The author reviewed studies of the GAHP housing strategy analyzed by James Rosenbaum and a team of sociologists from Northwestern University as well as other housing strategies that GAHP inspired. However, the author did not include the bigger picture with the political and financial aspects of national housing policy and welfare as well as a catch-22 situation in community revitalization.

More recently, the author has felt obligated to update this research because since 2017 in the U.S., racial tension has been constantly imminent with the current Republican administration. The president has been fueling public anger as well as stoking the anger and fear of white supremacists that has accumulated over the years under the Obama administration. In the last section of this paper, the author argues that the disproportionate impact on minority groups has become apparent during the pandemic crisis of 2020, exhibiting signs of vulnerability within American society. The virus does not choose who to target, but those who are in socioeconomically vulnerable positions such as essential workers have been bearing the brunt of the risk.

^{10.} Massey and Denton, American Apartheid.

^{11.} William J. Wilson, *The Truly Disadvantaged: The Inner City, the Underclass, and Public Policy* (Chicago: University of Chicago Press, 1990).

^{12.} Tsukamoto Emi, "The Path to 'Opportunity': How the Gautreaux Program Contributed to Integration, Policy Change, and Reform for Disadvantaged Neighborhoods," *Nanzan Review of American Studies* 35 (2013): 27–45.

^{13.} Ibid.

^{14.} Michael Collins and Christal Hayes, "Here are the times Donald Trump's critics say he stoked racial tensions," *USA TODAY*, August 5, 2019, https://www.usatoday.com/story/news/politics/2019/08/05/trump-and-race-presidents-critics-say-he-has-stoked-racial-tensions/1921410001/ (accessed May 4, 2020).

This paper revisits the Gautreaux legacies of Chicago to review more recent government reports and case documents to see how the lawsuit concluded and how the GAHP has been modified to improve the housing situation in the last several years. It also examines how the political situation has been changing public housing policies and addresses persistent racial issues shown in the urban area of Chicago, where people in disadvantageous positions can be easily victimized and have a hard time finding a way out of the detrimental cycle within the culture of segregation. At the same time, it is extremely difficult for them to address their predicament and earn public support. Wilson makes the same argument with the culture of poverty. 15 This paper attempts to highlight deeprooted social and political inequities in housing agenda and show that building a common ground of understanding in society and policy can be a starting point to a true sense of equity. Also, it tries to argue that Chicago still suffers from the legacy of segregation and marginalization, which reflects the fact that a disproportionate number of Blacks were impacted badly in the early stages of the great pandemic in 2020.

I: Settlement Agreement of the Gautreaux Case

1. Final Settlement Agreement and Background

The office of the mayor of the City of Chicago released a statement on January 23, 2019, from Mayor Rahm Emanuel and Chicago Housing Authority (CHA) CEO Eugene E. Jones, Jr., on U.S. District Court Judge Marvin E. Aspen's approval of the Gautreaux settlement agreement.¹⁶

Martin Luther King told us, "The arc of the moral universe is long, but it bends towards justice." When Dr. King came to Chicago to shine a light on discriminatory housing, he inspired Dorothy Gautreaux to action. Her lawsuit against CHA and HUD led to the Gautreaux Order compelling fair housing in all communities. The lifting of that order, which has now been replaced with a settlement agreement, is a sign of the progress we have made together as a city. The journey towards progress has been long, and it is one Chicago could only make by working together with strong partners like BPI. This decision marks a seminal moment in Chicago's

^{15.} William J. Wilson, *More than Just Race: Being Black and Poor in the Inner City* (New York: W. W. Norton & Company, 2009).

^{16.} Mayor's Press Office, "Statement From Mayor Rahm Emanuel And CHA CEO Eugene E. Jones, Jr. On U.S. District Court Judge Marvin E. Aspen's Approval Of Gautreaux Settlement Agreement," City of Chicago, January 23, 2019, https://www.chicago.gov/city/en/depts/mayor/press_room/press_releases/2019/january/GautreauxSettlementAgreement.html (accessed May 5, 2020).

history.17

BPI, which stands for "Business and Professional People for the Public Interest," is a nonprofit advocacy group that Alexander Polikoff, the leading attorney in the Gautreaux case, joined in 1970 bringing with him the civil rights case, which was filed in 1966 by Polikoff who was then an American Civil Liberties Union (ACLU) pro-bono attorney. Prior to the monumental statement of January 23, 2019, BPI released an announcement of a proposed settlement in the Gautreaux housing discrimination case on December 21, 2018, by saying that "The proposed settlement creates a detailed road map for the CHA to complete its *Gautreaux* obligations—which have required the agency to offset the impacts of racial segregation caused by its historic building and tenant assignment practices—by July 31, 2024." Then, the Gautreaux case will finally end as one of the longest federal court cases in U.S. history and concludes "a landmark chapter" in the national civil rights movement.

The main point over the fifty-year case was not to judge if the CHA as well as the local and federal governments made mistakes or not, which was apparent by then, but for the court to supervise how they could work together in order to fix the messed-up housing problem. The CHA was apparently charged with the racial discrimination of public housing tenants and site selection.²¹ Ms. Dorothv Gautreaux (1927-1968) was a community organizer, an activist, and a tenant living in the Altgeld Homes public housing project located on the far south side of Chicago. She died at the age of forty-one due to kidney failure on August 15, 1968, but her name was kept in the title of the case.²² Although it had two-story buildings with a good public housing design, the Altgeld project was constructed on top of a raw sewage landfill between 1943 to 1945 for African American veterans returning from World War II and their families. The residents worked at surrounding factories, such as at the Acme Steel plant and the Pullman factory; however, since most of these businesses pulled out in the 1980s, the community has been struggling with unemployment and air and water pollution that the factories left behind.²³ A privately funded nonprofit organization, Preservation

^{17.} Ibid.

^{18.} BPI, "History," https://www.bpichicago.org/about/history/ (accessed May 5, 2020).

^{19.} BPI, "CHA, BPI Announce Proposed Settlement in Landmark Gautreaux Housing Discrimination Case," BPI and CHA, December 21, 2018, https://www.bpichicago.org/blog/cha-bpi-announce-proposed-settlement-in-landmark-gautreaux-housing-discrimination-case/(accessed May 5, 2020).

^{20.} Ibid.

^{21.} Venkatesh, American Project.

^{22.} Polikoff, Waiting for Gautreaux, 65.

^{23.} Spencer Mcavo, "Lost in the Shuffle: The future of traditional public housing under the

Chicago, recommended that the housing should be considered for the National Register of Historic Places due to their significance in the history of public housing and its connection to the legacy of President Obama who started his early career and volunteer work in the community. Here demolition of deteriorated housing is not a solution if the process of the redevelopment is not taken into consideration. In fact, the Altgeld residents filed suit against the Walsh Group construction firm for redevelopment and the CHA in 2013, alleging that Walsh failed to provide them with priority employment under Section 3, which is the legal basis under the Housing and Urban Development (HUD) Act of 1968 for providing residents with jobs and awarding contracts to businesses in areas receiving certain types of HUD financial assistance in order to foster local economic development, neighborhood economic improvement, and individual self-sufficiency.²⁵

Many of the public housing complexes in Chicago were built under Mayor Richard J. Daley in the late 1950s and early 1960s to replace Black slums.²⁶ Owing to the dramatic migration of African Americans to urban cities in the North, there were serious issues such as a housing shortage and overcrowding; as a result, racial tensions heightened in those urban areas.²⁷ Chicago had developed as an industrial city by the first half of the twentieth century and attracted a great number of people to move into the city. The city faced a shortage of housing along with a massive influx of African Americans by the mid-1960s. With the rising demand for low-income housing, the CHA constructed high-rise public housing buildings with federal financial support. The largest project, the Robert Taylor Homes housing project, was completed in 1962 in order to provide housing

CHA's Plan for Transformation," *South Side Weekly*, January 8, 2014, https://southsideweekly.com/lost-in-the-shuffle/ (accessed May 14, 2020); Preservation in Chicago, "Altgeld Gardens, Blocks 11, 12 and 13," https://preservationchicago.org/chicago07/altgeld-gardens-blocks-11-12-and-13/ (accessed May 5, 2020).

^{24.} Ibid.

^{25.} Ethan Corey, "Public Housing Residents Demand Fair Chance at Contractor Jobs," *In These Times*, June 27, 2014, http://inthesetimes.com/ittlist/entry/16884/public_housing_residents_section_3 (accessed May 14, 2020); U.S. Department of Housing and Urban Development, "Section 3 Brochure," https://www.hud.gov/program_offices/fair_housing equal opp/section3/section3brochure (accessed May 14, 2020).

^{26.} Natalie Moore, "Why The Chicago Housing Authority Failed To Meet Its Mixed -Income Ambitions," *WBEZ*, March 23, 2017, https://interactive.wbez.org/cha/ (accessed May 13, 2020).

^{27.} The Library of Congress, "Moving North, Heading West," https://www.loc.gov/teachers/classroommaterials/presentationsandactivities/presentations/immigration/african7.html (accessed May 6, 2020); Nicholas Lemann, *The Promised Land: The Great Black Migration and How It Changed America* (New York: Vintage Books, 1991); Gilbert Osofsky, *The Burden of Race: Documentary History of Negro-White Relations in America* (New York: Harper & Row, Publishers, 1967).

for the overcrowded African-American population in Chicago, and it soon became the most notorious housing program in the nation.²⁸ The housing complexes and neighborhood areas kept deteriorating and it did not take long to become an environment that residents did not want to live in, including Dorothy Gautreaux, who eventually appealed to the court as a plaintiff. It has taken more than fifty years to undo and fix these past wrongdoings.

Chicago was not the only city to attract many African Americans who had been migrating from the South since the turn of the twentieth century for economic reasons and the harsh social conditions of the South, but Chicago was one of the richest cities for jobs as described in the Chicago Defender newspaper, the most widely read newspaper in the Black South, as "the promised land." About six million Blacks are estimated to have left the South to urban centers in other parts of the country, including Chicago, Detroit, New York City, and Philadelphia, during the Great Migration between 1910 and 1970.³⁰ James Grossman, Executive Director of the American Historical Society, states in his book, "(a)mong the many cities offering new employment opportunities, Chicago represented a logical destination for black men and women preparing to leave home in southern communities."31 The Chicago Defender offered "thousands of prospective migrants glimpses of an exciting city with a vibrant and assertive black community,"³² By 1940, the cities with the largest Black populations were New York, with a Black population of 458,000, and Chicago, with 277,000. Chicago's south and west sides became all Black, as did the central areas of Newark, Detroit, Baltimore, and Washington, D.C. Chicago (70.4) had the biggest index of Black isolation in 1930, which measures the extent to which Blacks live within neighborhoods, among major northern cities including Cleveland (51.0), Detroit (31.2), Milwaukee (16.4), and New York (41.8). A 100 percent index means that Blacks live in totally Black areas.³³

^{28.} Leonard S. Rubinowitz and James E. Rosenbaum, *Crossing The Class and Color Lines: From Public Housing to White Suburbia* (Chicago: The University of Chicago Press, 2000); Venkatesh, *American Project*.

^{29.} Emmett J. Scott, "Negro Migration during the War, Vol. 16," in *Carnegie Endowment for International Peace, Preliminary Economic Studies of the War*, ed. David Kinley (Oxford University Press, 1920), 26–48. Available at the National Humanities Center (2007): http://nationalhumanitiescenter.org/pds/maai3/migrations/text1/scottwwi.pdf (accessed May 7, 2020).

^{30.} U.S. Census Bureau, Library, "The Great Migration, 1910 to 1970," https://www.census.gov/dataviz/visualizations/020/ (accessed August 9, 2020).

^{31.} James R. Grossman, Land of Hope: Chicago, Black Southerners, and the Great Migration (Chicago: University of Chicago Press, 1991), 4.

^{32.} Ibid., 4.

^{33.} John R. Logan, Weiwei Zhang, and Miao Chunyu, "Emergent Ghettos: Black Neighborhoods in New York and Chicago, 1880–1940," *American Journal of Sociology* 120,

Inevitably, a holistic housing program to tackle the severe conditions was needed nationally after it grew into such a deep problem. It took years for the government to intervene, but a politically, socially, and economically motivated housing program called "HOPE VI" was created under the Clinton administration. Bill Clinton stated in his presidential campaign that he had "a plan to end welfare as we know it to break the cycle of welfare dependency." The HOPE VI Program was not a welfare program but was developed as the result of recommendations by the National Commission on Severely Distressed Public Housing, which was tasked with proposing a National Action Plan to eradicate severely distressed public housing. The program was reauthorized in 2009 as part of the Choice Neighborhoods Initiative Act under the Obama administration. The Gautreaux Assisted Housing Program was merged into a bigger spectrum with government funds without emphasizing too much of the racial discrimination that played a central role in housing segregation. The next section will discuss Chicago and how the Gautreaux case plays a role in the bigger picture.

2. The Legacy in the Name of Gautreaux

The settlement agreement of the Gautreaux case was approved by U.S. District Court Judge Marvin E. Aspen; however, the CHA must accomplish the promised work to right the past wrongs by 2024. According to the BPI's press release, the CHA must comply with the following steps to close the case:

- 1. Abide by a detailed schedule for planning and construction of its "Plan for Transformation" mixed-income communities currently underway or planned.
- 2. Develop all housing for families in non-mixed income communities in opportunity areas until at least 50 percent of all non-mixed-income family units are in opportunity areas.
- 3. Strengthen its voucher program to better enable families to live in opportunity areas, if they choose to do so.
- 4. Create early learning childhood development programs at four public housing complexes, replicating a program currently in place at the Altgeld Gardens

no. 4 (2015): 1055-94; Massey and Denton, American Apartheid, 23-24, 46.

^{34.} Richard L. Berke, "THE 1992 CAMPAIGN: THE AD CAMPAIGN; Clinton: Getting People Off Welfare," *New York Times*, September 10, 1992, Section a, page 20.

^{35.} U.S. Department of Housing and Urban Development, "HOPE VI-Public and Indian Housing," https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6 (accessed May 7, 2020); Susan J. Popkin, Diane K. Levy, Larry Buron, Megan Gallagher, and David J. Price, "The CHA's Plan for Transformation: How Have Residents Fared?" (Washington, D.C.: The Urban Institute, 2010), http://www.urban.org/sites/default/files/publication/29046/412190-The-CHA-s-Plan-for-Transformation-How-Have-Residents-Fared-.PDF (accessed May 7, 2020).

development.36

At the same time, all efforts the CHA has made over fifty years along with the court orders under the Gautreaux case are recognized as follows.

- Replacement of its large, 100 percent public housing projects such as Cabrini-Green, Stateway Gardens, and Robert Taylor Homes with new mixed-income communities;
- 2. Development of substantial new or rehabilitated public housing apartments across the city; and
- 3. Creation of a voucher program that currently provides subsidized housing opportunities in private market units in all 77 of Chicago's community areas and which now serves the greatest number of families.³⁷

The CHA's basic tactic to solve the Gautreaux case by a court order was to use the federal government's Housing Choice Voucher Program (HCVP) known as "Section 8," which was named after the section of the U.S. Housing Act that created vouchers in 1974.³⁸ The CHA's projects had become the poorest and most dangerous communities in the nation before the Gautreaux lawsuit was filed and the issues seemed to have been too difficult to solve with the voucher tactic only. The HUD took control of the CHA in 1995 to save public housing because of mismanagement of the properties. Then, the CHA regained control in 1999 and launched the Plan for Transformation to replace the CHA properties with new mixed-income communities.³⁹

Chicago's "Plan for Transformation" was launched in early 1999 by utilizing the HOPE VI subsidy, which became available for the Public Housing Authorities (PHAs) including the CHA after the Quality Housing and Work Responsibility Act (QHWRA) was passed in 1998. The CHA was the biggest recipient of the

^{36.} BPI, "CHA, BPI Announce Proposed Settlement in Landmark Gautreaux Housing Discrimination Case."

^{37.} Ibid.

^{38.} American Public Media, "The Section 8 Voucher," http://americanradioworks.publicradio.org/features/housing/c1.html (accessed May 6, 2020).

^{39.} Don Terry, "Chicago Housing Agency To Be Taken Over by U.S.," *New York Times*, May 28, 1995, Section a, page 1; Susan J. Popkin, *No Simple Solutions: Transforming Public Housing in Chicago* (Lanham, MD: Rowman & Littlefield, 2016), Kindle edition, chapter 2.

^{40.} U.S. Department of Housing and Urban Development, "Public Housing Reform," https://www.hud.gov/program_offices/public_indian_housing/phr/about (accessed May 7, 2020); Jerry J. Salama, "The Redevelopment of Distressed Public Housing: Early Results from HOPE VI Projects in Atlanta, Chicago, and San Antonio," *Housing Policy Debate* 10, no. 1 (1999): 95–142; Lanse Minkle, *The State of Economic and Social Human Rights: A Global*

HOPE VI subsidy. The QHWRA was introduced to encourage reform in public housing. Here are the basic targets to be achieved by the QHWRA, which seems to have helped the CHA to utilize tools and funds to work on the public housing issues.⁴¹

- 1. Reducing the concentration of poverty in public housing
- 2. Protecting access to housing assistance for the poorest families
- 3. Supporting families making the transition from welfare to work
- 4. Raising performance standards for public housing agencies, and rewarding high performance
- 5. Transforming the public housing stock through new policies and procedures for demolition and replacement and mixed-finance projects, and through authorizing the HOPE VI revitalization program
- 6. Merging and reforming the Section 8 certificate and voucher programs, and allowing public housing agencies to implement a Section 8 homeownership program
- 7. Supporting HUD management reform efficiencies through deregulation and streamlining and program consolidation. 42

The CHA's Plan for Transformation was expected to be implemented from three directions, which were a transformation of places, a transformation of people, and a transformation of the CHA's own practices. The areas were newly created and revitalized on a large scale, though not entirely. Many people's lives became safer and healthier in this better environment, and many obtained more opportunities to choose where they live by using the voucher even though there were too many people on the waiting list to move immediately. The CHA's operations should have been reasonably corrected as the Gautreaux case was settled in 2019. Although there is a fair amount of criticism, which will be discussed later, it is fair to say that many neighborhoods and residents' lives improved due to the CHA's revised practices.

Additionally, it is important to note that the CHA gained a tool to utilize funds as it was designated as a Moving to Work (MTW) Agency by the HUD from 2000

Overview (New York: Cambridge University Press, 2013), 97.

^{41.} Popkin et al., "The CHA's Plan for Transformation: How Have Residents Fared?"

^{42.} U.S. Department of Housing and Urban Development, "Public Housing Reform," https://www.hud.gov/program_offices/public_indian_housing/phr/about (accessed May 7, 2020).

^{43.} Popkin, No Simple Solutions, Kindle edition, chapter 2.

^{44.} Popkin, *No Simple Solutions*; Lawrence J. Vale and Erin Graves, "The Chicago Housing Authority's Plan for Transformation: What does the Research Show So Far?" *Final Report to the MacArthur Foundation*, June 8, 2010: 1–113.

through 2028. MTW is a demonstration program for PHAs such as the CHA to design and test innovative, locally designed strategies to help residents find employment and become self-sufficient as well as increase housing choices for low-income families. The program makes PHAs more flexible to use federal funds and to work locally under their own circumstances.⁴⁵

Chicago's transformation provided an opportunity for the former residents to live better lives as well as to encourage them to work and become independent. After a long and expensive journey, Chicago's efforts by both residents and management were mutually recognized and reached the final settlement agreement of Gautreaux. The next section will discuss things left invisible behind the settlement agreement of the Gautreaux case.

II: Individual Responsibility vs. Social Responsibility

1. Forced to Become Self-Sufficient

The Chicago Housing Authority (CHA) owned thirty-eight thousand units of public housing, including some of the most dilapidated housing in America, and anticipated 1.5 billion dollars in capital funds over the next ten years at the time the FY2000 annual plan was written. The CHA planned to demolish upwards of eighteen thousand obsolete housing units and concentrate its capital resources on redeveloping about twenty-five thousand units. The remaining funds were planned to build a standard of quality sufficient to attract a mix of different incomes so that public housing would not become home to extreme concentrations of poverty.⁴⁶ The annual plan addresses a new role for the CHA as follows.

This Plan contemplates much more than the physical transformation of public housing. It envisions a new role for the CHA. In the past, the CHA was primarily an owner and manager of public housing. In the future, the CHA will be a facilitator of housing opportunities. It will oversee a range of housing investments and subsidy vehicles. Where appropriate, it will own housing, but it will just as likely provide financial assistance to other private and non-profit development organizations to expand housing opportunities [...]. CHA is committed to long-term broad

^{45.} Chicago Housing Authority, FY2020 Comprehensive Budget Book (Chicago: CHA, 2019), https://cha-assets.s3.us-east-2.amazonaws.com/s3fs-public/2019-11/FY2020%20 Comprehensive%20Annual%20Budget.pdf (accessed May 9, 2020); U.S. Department of Housing and Urban Development, "Moving to Work Demonstration Program," https://www.hud.gov/mtw (accessed May 7, 2020).

^{46.} Chicago Housing Authority, *Chicago Housing Authority: Plan for Transformation—Improving Public Housing in Chicago And the Quality of Life* (Chicago: CHA, 2000), https://cha-assets.s3.us-east-2.amazonaws.com/s3fs-public/fy2000-annual-plan.pdf (accessed May 9, 2020).

With an ambitious sense of responsibility, the CHA worked hard to achieve the original Plan for Transformation goal over twenty years; however, according to the proposed FY2020 plan, they will be continuously attempting to achieve the initial goal set in 2000 of rehabilitating twenty-five thousand units of affordable housing in Chicago as well as targeting the goals of the Moving to Work (MTW) demonstration program assigned by the U.S. Department of Housing and Urban Development (HUD). The MTW demonstration program has four basic initiatives, which are Mixed-Income Redevelopment, Real Estate Acquisition Program, Property Rental Assistance Program, and Conversion of Moderate Rehabilitation Properties. Thus, the CHA is successively required to work with local and federal governments as well as the private sector such as developers, real estate companies, and apartment owners.

The FY2018 annual financial report includes resident statistics, which discloses 75.5 percent of the residents in the CHA low rent housing program as Black households among a total resident population of 28,959 as of December 31, 2018. It also lists 73 percent of the total number of households having a female as the head of household.⁴⁹ Also, the same report says that 85 percent of the CHA housing choice voucher (Section 8) program residents, who can live in subsidized private housing, are Black, and 77.7 percent of the total, 48,997, are female. Also, 44.3 percent of the total annual earnings are between \$8,000 and \$15,999. These facts appear to show typical Black female households that for a very long time have been described as poor victims of irresponsible Black men's behavior; however, according to William J. Wilson, the rising numbers of families headed by women is evidently related to increasing Black-male joblessness and white society is to blame.⁵⁰ Wilson acknowledged a historical analysis by Moynihan in his report published in 1965, where he argued that the high rate of Black singlemother families was overwhelmingly caused by intense hostility against Black males in times of slavery and discrimination in the American South under Jim

^{47.} Ibid.

^{48.} Chicago Housing Authority, *Proposed FY2020 Moving to Work Annual Plan*, October 17, 2019 (Chicago: CHA, 2000), https://cha-assets.s3.us-east-2.amazonaws.com/s3fs-public/2019-10/CHA%20FY2020%20MTW%20Annual%20Plan%20for%20Submission%20 to%20HUD_0.pdf (accessed May 9, 2020).

^{49.} Chicago Housing Authority, *Comprehensive Annual Financial Report For the Years Ended December 31, 2018 and 2017*, April 15, 2019 (Illinoi: CHA, 2019), https://cha-assets.s3.us-east-2.amazonaws.com/s3fs-public/2019-07/2018%20CAFR.pdf (accessed May 9, 2020).

^{50.} Wilson, The Truly Disadvantaged.

Crow laws, which blocked the emergence of a strong father figure.⁵¹

Mounk argues that we live in an "age of responsibility" now and "the shift from emphasis on structural, society-level considerations to an emphasis on the individual and his or her responsibilities took place slowly, as a result of subtle transformations in philosophy and the social science" in the second half of the twentieth century.⁵² He specifically claims that the concept of responsibility has been transformed over the decades from "responsibility-as-duty" to "responsibility-as-accountability," which has been growing in Western politics since the 1980s.⁵³ He interprets the former President Obama's speeches addressed at the Apostolic Church of God in Chicago in 2008⁵⁴ and at Morehouse College 2013⁵⁵ as examples of "responsibility-as-accountability," which means "each individual is responsible for overcoming his own hardships" and our responsibility for others weakens, yielding a negative result.⁵⁶ However, it seems more important to interpret that Obama, as the first Black president of the U.S., presumably tried to address a broad spectrum of issues not only for African Americans, but also for all people in a nation where there had never been enough of a safety net to begin with. Yet, on other occasions, Obama did not forget to state the importance of helping others succeed. He repeatedly encouraged school children to study hard and encouraged university students to keep up their efforts and take responsibility for their own lives. He warned university students to be prepared for an unfair world.⁵⁷ His rhetoric is connected to his own life story and

^{51.} U. S. Department of Labor, Office of Planning and Research, *The Negro Family: The Case for National Action* (Washington, D.C.: U.S. Printing Office, 1965). https://www.dol.gov/general/aboutdol/history/webid-moynihan (accessed May 9, 2020).

^{52.} Yascha Mounk, *The Age of Responsibility: Luck, Choice, and the Welfare State* (Cambridge: Harvard University Press, 2017), Kindle edition, introduction.

^{53.} Ibid., chapter 1.

^{54.} Julie Bosman, "Obama Calls for More Responsibility From Black Fathers," *New York Times*, June 16, 2008, https://www.nytimes.com/2008/06/16/us/politics/16obama.html (accessed May 12, 2020).

^{55.} Zeke J. Miller, "Obama Discusses Race, Fatherhood, Responsibility at Morehouse College (Transcript Included)," *Time*, May 19, 2013, https://swampland.time.com/2013/05/19/obama-discusses-race-responsibility-at-morehouse-college/ (accessed May 12, 2020).

^{56.} Mounk, The Age of Responsibility, Kindle edition, chapter 1.

^{57.} The White House President Barack Obama, "President Obama's 2010 Back to School Speech," September 14, 2010, https://obamawhitehouse.archives.gov/the-press-office/2010/09/13/remarks-president-barack-obama-prepared-delivery-back-school-speech (accessed September 15, 2020); "President Obama's 2009 Back to School Speech," September 8, 2009, https://obamawhitehouse.archives.gov/back-to-school (accessed May 12, 2020); "Read President Obama's Commencement Address at University of Michigan," *Time*, May 1, 2010, https://time.com/4340774/obama-commencement-speech-transcript-university-of-michigan/ (accessed May 12, 2020); "Obama's full remarks at Howard University commencement ceremony," *Politico*, May 7, 2016, https://www.politico.com/story/2016/05

seems persuasive and reasonable to many American people on a personal level. Education opens a door to opportunity and learning a practical way to live and survive with encouragement may be somewhat effective for one to gain mental strength and enhance autonomy.

2. Criticism Against the Plan for Transformation

Eventually, the Gautreaux case cut deeply to the core of racial issues in Chicago that were reflected in public housing. The reality for many African Americans still seems challenging and harsh not only because the Plan for Transformation is behind the initial schedule as mentioned earlier, but also it is questionable if the residents' lives truly improved after a vast amount of money was used for the program. Natalie Moore, an African American reporter at the nonprofit public radio station WBEZ Chicago, said that "(t)he centerpiece of the Plan for Transformation was the new mixed-income communities: a third public housing, a third affordable housing and a third market-rate housing in a combination of rental and homeownership."58 She reported that social tensions arose over rules and representation because the residents became an unfair target with restrictions related to loitering, barbequing, and noise.⁵⁹ These kinds of social tensions often arise in a racially and economically mixed community and it often starts from one person's small wrongdoing, such as talking loudly in the yard and feeding stray cats; however, at the end of the day, we all wonder who wants to live in a strictly controlled monocultural neighborhood, where we are likely to suffocate.

Other critics such as Jake Bittle, the former editor-in-chief of the nonprofit newspaper *South Side Weekly*, covered the progress of the Plan for Transformation with his cowriters by interviewing Roderick Wilson, the executive director of the Lugenia Burns Hope Center, which was founded in 1994 by former President Obama and Dr. Sokoni Karanja to develop the civic engagement of residents in Chicago's Bronzeville neighborhood, and other communities, through education, leadership development, and community organizing. They reported on January 31, 2017, that the plan did not improve the quality of the lives of the people there, but it removed low-income people and replaced them with the more affluent. The article states that "(t)he recession may have prevented continued private

[/]obamas-howard-commencement-transcript-222931 (accessed May 12, 2020).

^{58.} Natalie Moore, "Why The Chicago Housing Authority Failed."

^{59.} Ibid.

^{60.} Jake Bittle, Srishti Kapur, and Jasmine Mithani, "Redeveloping the State Street Corridor," *South Side Weekly*, January 31, 2017, https://southsideweekly.com/chicago-unfulfilled-promise-rebuild-public-housing/ (accessed May 9, 2020); The Lugenia Burns Hope Center, "About," https://www.lbhopecenter.com/about/ (accessed May 14, 2020).

investment in areas around the State Street redevelopments, but the long delays on the completion of these developments themselves have all but destroyed the tight-knit communities that once occupied these areas, even if some residents have had or may someday have the chance to return."⁶¹ While other journalists also write about the difficult aspects of the economy and creating mixed-income housing, 62 Bittle concluded in his follow-up article of April 16, 2019, by saying, "(t)he communities that the CHA demolished in the early 2000s will now only reappear in fits and starts, if they reappear at all. And as rents across the city continue to rise, it remains an open question how the post-Plan for Transformation CHA will serve the thousands of Chicagoans in need of an affordable place to live."⁶³

The South Side of Chicago was halfway gentrified as witnessed by the author in May, 2015, and the Plan for Transformation has always been the biggest challenge for Chicago in terms of desegregation as well as the geographical and financial costs of the revitalization. Having been examined in the past, the CHA's practices are still questionable, particularly with the wisdom of hindsight of what the CHA could have done better to make the Plan for Transformation more successful. The next section will discuss updated political and social struggles along with Chicago's challenges for community transformation.

III: Continuing Struggles in the Catch-22 Situation

1. Unfair Housing Policies in the Trump Era

The Affirmatively Furthering Fair Housing (AFFH) provision was part of the Fair Housing Act, which was signed by President Lyndon Johnson on April 11, 1968.⁶⁴ Through that provision, Congress directed the U.S. Department of

^{61.} Jake Bittle, Srishti Kapur, and Jasmine Mithani, "Redeveloping the State Street Corridor."

^{62.} Whet Moser, "Chicago Has Struggled to Build Mixed-Income Housing for 50 Years: It's been the CHA's goal since long before the Plan for Transformation, but resistance and mismanagement have dogged it since the 1960s," *Chicago Magazine*, March 30, 2017, https://www.chicagomag.com/city-life/March-2017/Chicago-Has-Struggled-to-Build-Mixed-Income -Housing-For-50-Years/ (accessed May 9, 2020); Dennis Rodkin, "The CHA had a grand plan for the future of public housing. Then came the bust: At least one part of a well-intentioned plan to replace public housing with mixed-income communities has failed: the sale of market -rate homes." *Crain's Chicago Business*, April 19, 2019, https://www.chicagobusiness.com/residential-real-estate/cha-had-grand-plan-future-public-housing-then-came-bust (accessed May 14, 2020).

^{63.} Jake Bittle, "What Is the CHA Doing?: Nearly two decades on, the legacy of the agency's Plan for Transformation haunts Chicago," *South Side Weekly*, April 16, 2019, https://southsideweekly.com/cha-plan-for-transformation-haunts-chicago/ (accessed May 9, 2020).

^{64.} National Fair Housing Alliance, "Furthering Fair Housing," https://nationalfairhousing.

Housing and Urban Development (HUD) to make sure that neither the agency itself, nor the cities, counties, states, and public housing agencies it funds, discriminate in their programs. The final rule was published in the Federal Register on July 16, 2015, under the Obama administration. 65 According to the American Bar Association (ABA), more than four million instances of housing discrimination still occur each year, and the vast majority are unreported. The ABA recognizes that enforcement by private lawsuits is the primary means by which the Fair Housing Act is enforced but it is important that Congress empowered the HUD and the Department of Justice to enforce the law as well.⁶⁶ While the Trump administration has been dismantling Obama's legacy, a lawsuit was filed on May 18, 2018, against the HUD and its secretary, Ben Carson, in his official capacity because the administration illegally suspended the AFFH rule promulgated in 2015 under the Obama administration.⁶⁷ The plaintiffs, National Fair Housing Alliance with Texas Low Income Housing Information Service and Texas Appleseed, appealed the case that "(o)n January 5, 2018, HUD abruptly announced, without prior notice or opportunity to comment, that it was suspending the AFFH Rule's requirement that local governments complete and submit AFHs" which are Assessments of Fair Housing to analyze fair housing issues.⁶⁸ The case was ruled in favor of the HUD. Beryl A. Howell, the chief judge, issued a memorandum opinion on August 17, 2018, concluding that the defendants' motion to dismiss was granted and the plaintiffs' motion was denied.⁶⁹ According to Lola Fadulu of the New York Times, Ben Carson thinks that the current rule suffocates investment in some of the most distressed neighborhoods that need investment the

org/affirmatively-furthering-fair-housing/ (accessed May 14, 2020); U.S. Department of Housing and Urban Development, "History of Fair Housing."

^{65.} U.S. Department of Housing and Urban Development, "Affirmatively Furthering Fair Housing; Final Rule," *Federal Register* 80, no. 136 (July 16, 2015): Rules and Regulations, https://www.govinfo.gov/content/pkg/FR-2015-07-16/pdf/2015-17032.pdf (accessed May 14, 2020); National Fair Housing Alliance, "Furthering Fair Housing."

^{66.} Stephen M. Dane, "Fair Housing Policy Under the Trump Administration," the American Bar Association, November 30, 2019, https://www.americanbar.org/groups/crsj/publications/human_rights_magazine_home/economic-justice/fair-housing-policy-under-the-trump-administration/ (accessed May 15, 2020).

^{67.} National Fair Housing Alliance v. Carson, Civil Action No. 2018–1076 (D.D.C. 2018).

^{68.} U.S. District Court, District of Columbia, *National Fair Housing Alliance v. Carson*, Sasha Samberg-Champion, 2018, https://assets.documentcloud.org/documents/4454076/Complaint-filed-against-HUD-Secretary-Ben-Carson.pdf (accessed May 15, 2020); The HUD Exchange, "The Assessment of Fair Housing," https://www.hudexchange.info/programs/affh/overview/ (accessed May 15, 2020).

^{69.} U.S. District Court, District of Columbia, *National Fair Housing Alliance v. Carson*, Beryl A. Howell, 2018, https://prrac.org/pdf/Opinion_US_District_Court_DC_8_17_18.pdf (accessed May 15, 2020).

most.⁷⁰ The second amended complaint was filed on September 14, 2018;⁷¹ however, it seems difficult to overthrow a decision that has already been made.

Additionally, before he was sued, Ben Carson had proposed changes to federal housing subsidies on April 25, 2018, which triple rent for the poorest households and make it easier for housing authorities to impose work requirements. ⁷² Ironically, President Trump signed an Executive Order establishing the White House Council on Eliminating Barriers to Affordable Housing, and appointed the HUD Secretary, Ben Carson, as the chairperson on June 25, 2019, in order to identify and remove the obstacles that impede the production of affordable homes. ⁷³

It is important for the government to keep the economy flowing; however, it should not be done by minimizing a safety net for people who most need it and putting low-income families in a more difficult position. Also, if the government only listens to the opinions of those who have financial and social power or simply those who are in the majority, African Americans would never and could never achieve equal opportunity in society, including housing, education, and work. Congressman Don Beyer, Vice Chair of the Joint Economic Committee, released a new report in February 2020, regarding socioeconomic progress in a post-civil rights era, as well as challenges facing the Black community in America. The report says that "America made significant progress in reducing social and economic disparities in the latter half of the 20th century"; however, it clearly shows the persistence of very deep social and economic inequities. For example, Black college graduation rates more than doubled from 1990 to 2018, but the median net worth for white families is nearly 10 times greater than for Black families. The Black unemployment rate (6 percent) was twice as high as the white unemployment rate (3.1 percent) in January 2020, and Black children are three times as likely to live in poverty as white children. The report states that

^{70.} Lola Fadulu, "Trump Pulls Back Efforts to Enforce Housing Desegregation: The Department of Housing and Urban Development, hoping to lower housing costs, will propose new rules that reverse Obama-era efforts to desegregate housing," *New York Times*, Jan. 3, 2020, https://www.nytimes.com/2020/01/03/us/politics/trump-housing-segregation.html (accessed May 15, 2020).

^{71.} U.S. District Court, District of Columbia, *National Fair Housing Alliance v. Carson*, Sasha Samberg-Champion, 2018, https://prrac.org/pdf/second_amended_complaint.pdf (accessed May 15, 2020).

^{72.} Tracy Jan, Caitlin Dewey, and Jeff Stein, "HUD Secretary Ben Carson to propose raising rent for low-income Americans receiving federal housing subsidies," *The Washington Post*, April 26, 2018, https://www.washingtonpost.com/news/wonk/wp/2018/04/25/hud-secretary-ben-carson-to-propose-raising-rent-for-low-income-americans-receiving-federal -housing-subsidies/ (accessed May 15, 2020).

^{73.} Exec. Order No. 13878, 84 Fed. Reg. 30853 (June 25, 2019), https://www.govinfo.gov/content/pkg/FR-2019-06-28/pdf/2019-14016.pdf (accessed May 15, 2020).

persistent segregation leads to large disparities in the quality of secondary education, leading to worse economic outcomes.⁷⁴ Economists Bradley L. Hardy, Trevon D. Logan, and John Parman analyzed how the spatial distribution of the Black population has evolved over time and how it has interacted with economic mobility and U.S. public policy. In the 2018 framing paper of the Hamilton Project, which is an economic policy initiative at the Brookings Institution with a combination of academics, business people, and public policy makers, they indicate that "(a)reas with large black population shares are the areas where black individuals experience particularly low levels of economic mobility, with black children born into below-median-income families tending to remain below the median income." They emphasize the importance of both place and policy in determining individual outcomes.⁷⁵ It is doubtful that the housing policies under the Trump administration would decrease the formation of segregation in housing even if it could possibly enhance a housing market in the U.S. The next section will discuss how unfair it is for African Americans to go through a pandemic and what it reflects within American society.

2. Residential Segregation by Race Under the Pandemic

A pneumonia of unknown cause detected in Wuhan, China, was first reported to the World Health Organization (WHO) Country Office in China on December 31, 2019, and the outbreak was declared a Public Health Emergency of International Concern on January 30, 2020. The WHO announced the name for the new coronavirus disease, COVID-19, on February 11, 2020. The mainstream media has reported that the COVID-19 crisis has affected African Americans the most in Chicago and more than 70 percent of virus-related fatalities were among African Americans. According to a live tracker of COVID-19 deaths in Chicago's neighborhoods updated by Bea Malsky at *South Side Weekly*, the death

^{74.} Joint Economic Committee, *The Economic State of Black America in 2020*, https://www.jec.senate.gov/public/_cache/files/ccf4dbe2-810a-44f8-b3e7-14f7e5143ba6/economic-state-of-black-america-2020.pdf (accessed August 7, 2020).

^{75.} Bradley L. Hardy, Trevon D. Logan, and John Parman, "The Historical Role of Race and Policy for Regional Inequality," *The Hamilton Project* (Washington, D.C.: The Brookings Institution, 2018), https://www.hamiltonproject.org/assets/files/PBP HardyLoganParman 1009.pdf (accessed August 7, 2020).

^{76.} World Health Organization, "Summary," https://www.who.int/emergencies/diseases/novel-coronavirus-2019/events-as-they-happen (accessed May 15, 2020).

^{77. &}quot;Coronavirus wreaks havoc in African American neighbourhoods," *BBC*, April 7, 2020, https://www.bbc.com/news/world-us-canada-52194018 (accessed May 15, 2020); Ron Elving, "What Coronavirus Exposes About America's Political Divide," *NPR*, April 12, 2020, https://www.npr.org/2020/04/12/832455226/what-coronavirus-exposes-about-americas-political-divide (accessed May 15, 2020).

toll is still ongoing, but it shows a racially disproportionate number among 1,594 deaths attributed to COVID-19 in total, as of May 15, 2020, as pulled from Cook County Medical Examiner records released through the Cook County Data Portal.⁷⁸

Total 1,594 deaths (as of May 15, 2020)

Black: 728 deaths (45.67%)White: 456 deaths (28.61%)Latinx: 311 deaths (19.51%)Asian: 56 deaths (3.51%)

- Unknown + Other: 43 deaths $(2.7\%)^{79}$

While not fully comparative, comparing it to the recent population figures in Chicago from the U.S. Census Bureau with the numbers above, the Black population composes about 30 percent of the total population of Chicago and the white population composes about 50 percent within a five-year estimate. 80

Total 2,705,994 people (population estimates, July 1, 2018)

- White alone: 49.4%

- Black or African American alone: 30.1%

- Hispanic or Latino*: 29.0%

- Asian alone: 6.4%

Additionally, the death toll in each community area shows a different pattern, and it is becoming clear that Blacks are dying more regardless of where they live in Chicago. 82 Here are the top five community areas where the death toll is highest. In most cases, it is their home address, but their location is recorded as

^{*} Hispanics may be of any race, so are also included in applicable race categories.⁸¹

^{78.} Bea Malsky, "COVID-19 Deaths in Chicago's Neighborhoods: A Live Tracker," *South Side Weekly*, May 15, 2020, https://covid19neighborhoods.southsideweekly.com/ (accessed May 15, 2020).

^{79.} Ibid.

^{80.} U.S. Census Bureau, Population Estimates Program, "QuickFacts: Chicago City, Illinois, United States," https://www.census.gov/quickfacts/fact/table/chicagocityillinois,US/RHI825218#RHI825218 (accessed May 15, 2020).

^{81.} Ibid.

^{82.} Samah Assad, Dorothy Tucker, and Carol Thompson, "MAP: Where Are COVID-19 Deaths Happening? In Chicago, Most Are In Majority-Black Neighborhoods," *CBS Chicago*, https://chicago.cbslocal.com/map-where-are-covid-19-deaths-happening-the-most-in-chicago-neighborhoods-with-majority-black-populations/ (accessed May 15, 2020).

- South Shore: 85 deaths (16.9 deaths per 10,000 residents)
- Austin: 75 deaths (7.9 deaths per 10,000 residents)
- South Lawndale (Little Village): 69 deaths (9.2 deaths per 10,000 residents)
- West Ridge: 61 deaths (8.0 deaths per 10,000 residents)
- Rogers Park: 55 deaths (10 deaths per 10,000 residents)
- * No location vet listed for 204 death records. 84

According to *Fact Sheet: Black Population Loss in Chicago*, issued in July 2019 by Great Cities Institute, University of Illinois at Chicago, Chicago has been losing its Black population since its peak in or around the 1980 census; however, Austin had the biggest Black population and South Shore had the second biggest Black population among major Black community areas in the 2013–2017 American Community Survey, U.S. Census Bureau. 85

The Centers for Disease Control and Prevention (CDC), one of the major operating components of the Department of Health and Human Services, also warns that the current data of COVID-19 patients suggests a disproportionate effect of illness and death among racial and ethnic minorities. The CDC points out three key factors that make those racial and ethnic minorities more vulnerable, which are living conditions, access to health care, and work circumstances. Racial segregation in housing is connected to a lack of wellness, crowded households, and limited access to a health facility, as well as predicting access to a simple grocery store or pharmacy. For those who live in a racially segregated area, it is often difficult to keep socially distant from neighbors or family. Also, socioeconomically vulnerable people tend to be essential workers such as bus drivers, food service workers, and janitors. Therefore, they often cannot take paid sick leave and cannot afford proper health insurance.⁸⁷

According to the employment data from April 2020 released by the Bureau of

^{83.} Bea Malsky, "COVID-19 Deaths in Chicago's Neighborhoods: A Live Tracker."

^{84.} Ibid.

^{85.} Matthew D. Wilson and Alex Linares, *Fact Sheet: Black Population Loss in Chicago* (Chicago: Great Cities Institute, University of Illinois, 2019), https://greatcities.uic.edu/wp-content/uploads/2019/08/Black-Population-Loss-in-Chicago.pdf (accessed May 16, 2020).

^{86.} CDC, "COVID-19 in Racial and Ethnic Minority Groups," last modified April 22, 2020, https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/racial-ethnic-minorities.html (accessed May 16, 2020).

^{87.} CDC, "COVID-19 in Racial and Ethnic Minority Groups"; Rashawn Ray, "Why are Blacks dying at higher rates from COVID-19?" The Brookings Institution, April 9, 2020, https://www.brookings.edu/blog/fixgov/2020/04/09/why-are-blacks-dying-at-higher-rates -from-covid-19/ (accessed May 16, 2020).

Labor Statistics, more than twenty million Americans lost their jobs in April, lifting the unemployment rate to 14.7 percent, and economists analyzed that the impact was disproportionately felt by women and minorities, as well as the youngest, oldest, and lowest-paid workers. Responding to the analysis, Cornel West, the author of *Race Matters*, says that the pandemic crisis is just revealing the problems in our world and economic viruses were already at work before COVID-19 hit. When a global pandemic or disaster happens, it hits vulnerable people within society the most. It seems to be a basic social tenet that we all have been witnessing live. The COVID-19 crisis is testing if we have enough resilience to overcome it as well as if we can develop a vaccine or treatment. If the crisis is pushing us hard to a whole different level of living in order to develop a society of solidarity, we must act accordingly.

Conclusion

The settlement agreement of the Gautreaux case in 2019 sounds like a big closure, but it has become clear that it did not do as much as it could to accomplish the challenging goal of helping public housing residents to move to racially integrated neighborhoods. The core issue of racial segregation was at least widely recognized in Chicago. Subsequently, the Plan for Transformation was implemented along with the Moving to Work plan, being supported by federal and local government funding. The key to fixing the past wrongs and building a fairer society is in the manner of how they implement the plan. The Plan for Transformation in Chicago must stick to the original purpose, which was expected to be implemented from three directions, a transformation of places, a transformation of people, and a transformation of the CHA's own practices. The orchestrated plan is continuously expected to be improved and adapted.

The Gautreaux case has been assimilated into a bigger transformation that the late Dorothy Gautreaux probably could have only dreamed of at its beginning. At the same time, the Plan for Transformation has grown into nothing but gentrification by another name, something that Gautreaux would not have wanted. Racial segregation in Chicago was transformed into a color-blind instrument to redevelop an urban area. Thus, it has become clear that her struggle is still a deeply American struggle which, under massive public pressure, has become even more difficult for people to remove themselves from.

^{88.} Karen Ho, "April's staggering job losses were felt most by women, minorities, and the lowest paid workers," *Quartz*, May 9, 2020, https://qz.com/1853641/covid-19-job-losses-in-april-hurt-women-and-minorities-the-most/ (accessed August 9, 2020).

^{89.} Cornel West, interview by Shumita Basu, *The Takeaway*, WNYC Studios, NY, May 12, 2020, https://www.wnycstudios.org/podcasts/takeaway/segments/conversation-with-cornel-west (accessed August 7, 2020); Cornel West, *Race Matters* (Boston: Beacon Press, 2001).

At the time of writing, the Trump administration has not made the struggle easier and even seems to have made it more difficult to provide a fair opportunity to all Americans. Also, it has become clear that the disproportionate effect of illness and death among racial and ethnic minorities under the recent pandemic reflects the racial issues embedded in American society as seen in their poor living conditions, bad work circumstances, and lack of health care. Blacks in Chicago are still suffering from the effects of segregation and socioeconomic marginalization.

As Popkin says, there are no simple solutions to these deep challenges.⁹⁰ However, if many residents in public housing are Black single mothers with children, the challenges should be addressed and tackled through the reality of "Blacks" and "women" suffering double discrimination and marginalization as suggested by Kimberlé W. Crenshaw, a leading scholar of critical race theory who developed the theory of intersectionality.⁹¹ The Chicago housing transformation has been far too expensive and ongoing for far too long, and people have been taking the brunt of the government's decisions. Desegregation in housing does not solve all socioeconomic problems; however, desegregation is a key idea to have a positive effect in a diverse society through interaction with people who from early in life are different to each other. Becoming responsible and self-sufficient contributes to building a fair society, but it would take many years to compound individual efforts to change a society and these alone cannot solve everything if the social structure is racially, politically, and economically biased. Chicago needs a strong multilayered plan to desegregate its neighborhoods and integrate society so that anyone can choose adequate housing for a good life and ensure a safe future for their families.

^{90.} Popkin, No Simple Solutions, Kindle edition.

^{91.} Kimberlé W. Crenshaw, "Demarginalizing the Intersection of Race and Sex: A Black Feminist Critique of Antidiscrimination Doctrine, Feminist Theory and Antiracist Politics," *University of Chicago Legal Forum*, Issue 1, Article 8 (1989): 139–68.