TWIN CITIES REGIONAL ASSESSMENT OF FAIR HOUSING

Prepared by
the Lawyers' Committee for Civil Rights Under Law

January 21, 2021

I. TABLE OF CONTENTS **2**
II. Executive Summary **3**
III. Community Participation Process **11**
IV. Assessment of Past Goals……..**16**
V. Fair Housing Analysis **45**
A. Demographic Summary **45**
B. General Issues **88**
i. Segregation/Integration **88**
ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) **139**
iii. Disparities in Access to Opportunity **147**
iv. Disproportionate Housing Needs **164**
C. Publicly Supported Housing Analysis **229**
D. Disability and Access **252**
E. Fair Housing Enforcement, Outreach Capacity and Resources **289**
VI. Fair Housing Goals and Priorities **295**
VII. Appendices **301**
A. Contributing Factors Appendix **301**
B. Data Documentation Appendix **347**
C. Segregation/Integration Appendix **353**
D. Disparities in Access to Opportunity Appendix **401**
E. Publicly Supported Housing Appendix **585**
F. Public Comments Index **618**

II. Executive Summary

The Twin Cities Regional Analysis of Impediments to Fair Housing choice (AI) is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA). This analysis specifically analyzes the following jurisdictions in the Twin Cities Region: Anoka County, Coon Rapids, Dakota County Hennepin County, Bloomington, Eden Prairie, Minneapolis, Minnetonka, Plymouth, Ramsey County, St. Paul, Washington County, Woodbury, Scott County and Carver County. While Coon Rapids and Minnetonka are no longer classified as entitlement jurisdictions, the two cities were included in this analysis, as they were entitlement jurisdictions for the majority of the 5-year period between AIs conducted for the Region.

In addition to analyzing and identifying barriers to fair housing choice within the Region, this AI also outlines meaningful strategies that can be implemented to achieve progress towards the various entitlement jurisdictions' obligation to affirmatively furthering fair housing. The Lawyers' Committee for Civil Rights Under Law (Lawyers' Committee), in consultation with the Twin Cities Fair Housing Implementation Council (FHIC) prepared this AI. To provide a foundation for the conclusions and recommendations presented in this AI, the Lawyers' Committee reviewed and analyzed:

- Data from the U.S. Census Bureau and other sources about the demographic, housing, economic, and educational landscape of the Consortium, nearby communities, and the broader region;
- Local housing production and education data;
- Various County and City planning document and ordinances;
- Data reflecting housing discrimination complaints;
- The input of a broad range of community groups and stakeholders that deal with the realities of the housing market and the lives of members of protected classes in the Twin Cities Region.

The AI draws from these sources to conduct an analysis of fair housing issues such as patterns of integration and segregation of members of protected classes, racially or ethnically concentrated areas of poverty regionally, disparities in access to opportunity for protected classes, and disproportionate housing needs. The analysis also examines publicly supported housing in the city as well as fair housing issues for persons with disabilities. Private and public fair housing enforcement, outreach capacity, and resources are evaluated as well. The AI identifies contributing factors to fair housing issues and steps that should be taken to overcome these barriers.

Overview of the Twin Cities Region

The Twin Cities Region falls within the Minneapolis-St. Paul-Bloomington, MN-WI metropolitan statistical area. The Region has historically been overwhelmingly white and remains so to this day, despite a growing number of immigrants of color. Minneapolis and St. Paul specifically are the most diverse, both of which have historical enclaves of Black residents. The cities have growing Hispanic/Latinx populations, as well as growing communities of Hmong and Somali residents. With the exception of smaller suburbs immediately outside of the urban centers the remainder of

the region remains extremely white, despite small concentrations of Black, Indigenous and other people of color (BIPOC).

Patterns of segregation and disparities in access to opportunity in housing and other areas are very stark in the Twin Cities. The same characteristics that make the Twin Cities an ideal place to live for many—environmental healthy neighborhoods, proficient schools, and high home ownership rates, to name a few—are not at all equally experienced by the Region's communities of color, low-income communities, and persons with disabilities. Neighborhoods with higher concentrations of BIPOC residents have less access to proficient schools, are less environmentally healthy, have less access to transportation and jobs and have higher rates of poverty. Many jurisdictions within the region have taken significant steps to improve access to safe and affordable housing, including increased contributions to Housing Trust Funds, zoning changes, larger and deeper affordability requirements for new developments, and reform of code enforcement services. At the same time, however, the Twin Cities region is attractive to outside investors using their capital to fund massive new developments that are not affordable for many residents. Smaller, outer ring suburbs have also experienced Not in My Backyard (NIMBY) sentiment from residents in response to attempts to develop more affordable housing or allow for increased density. In addition, as the urban centers become less affordable, many residents are being pushed out to the suburbs. Transit-oriented development has provided additional transportation options throughout the larger suburban/rural region, but has also been met with critiques of displacement and gentrification of communities of color that once resided in the new transit corridors.

Further, as civil rights attorneys, we would be remiss not to acknowledge that systemic racism within the Region has led to strategic disinvestment in communities of color, and over-policing of Black and Brown bodies. These disparities were brought to the forefront in Minneapolis following the murder of George Floyd by officers of the Minneapolis Police Department. The police were called by the clerk of a Minneapolis convenience store, located at 38th Street and Chicago Avenue, over an allegedly counterfeit $20 bill. Since then, residents of the Region and the country have stood up to demand that police no longer be able to ravage Black communities. This event has sparked important conversations in the Region and beyond, and we hope that as a result, data in future Analyses of Impediments will show increased opportunity to housing, jobs, and schools for historically disadvantaged populations.

Contributing Factors to Fair Housing Issues

In addition to the main sections of the AI, this analysis includes a discussion of the following contributing factors to fair housing issues:

1. Access to financial services
2. Access for persons with disabilities to proficient schools
3. Access to publicly supported housing for persons with disabilities
4. Access to transportation for persons with disabilities
5. Admissions and occupancy policies and procedures, including preferences in publicly supported housing
6. Availability of affordable units in a range of sizes
7. Availability, type, frequency, and reliability of public transportation
8. Community opposition

9. Deteriorated and abandoned properties
10. Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
11. Displacement of residents due to economic pressures
12. Impediments to mobility
13. Inaccessible public or private infrastructure
14. Inaccessible government facilities or services
15. Lack of access to opportunity due to high housing costs
16. Lack of affordable, accessible housing in a range of unit sizes
17. Lack of affordable in-home or community-based supportive services
18. Lack of affordable, integrated housing for individuals who need supportive services
19. Lack of assistance for housing accessibility modifications
20. Lack of assistance for transitioning from institutional settings to integrated housing
21. Lack of community revitalization strategies
22. Lack of local private fair housing outreach and enforcement
23. Lack of local public fair housing enforcement
24. Lack of local or regional cooperation
25. Lack of meaningful language access for individuals with limited English proficiency
26. Lack of private investment in specific neighborhoods
27. Lack of public investment in specific neighborhoods, including services or amenities
28. Lack of resources for fair housing agencies and organizations
29. Lack of state or local fair housing laws
30. Land use and zoning laws
31. Lending discrimination
32. Location of accessible housing
33. Location of employers
34. Location of environmental health hazards
35. Location of proficient schools and school assignment policies
36. Location and type of affordable housing
37. Loss of affordable housing
38. Occupancy codes and restrictions
39. Private discrimination
40. Quality of affordable housing information programs
41. Regulatory barriers to providing housing and supportive services for persons with disabilities
42. Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
43. Source of income discrimination
44. State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings
45. Unresolved violations of fair housing or civil rights law

Proposed Goals and Strategies

The following goals and strategies were developed and refined using the aforementioned data sources and extensive conversations with community groups, local stakeholders, community members, and jurisdiction staff.

Goal 1: Increase the supply of affordable housing in high opportunity areas.

- Change existing land use and zoning laws, where possible, to allow for more types of affordable housing, such as Accessory Dwelling Units (ADUs), Single Room Occupancy (SRO) multi-family projects, or other low cost models such as tiny homes.
- Provide additional investments in the Affordable Housing Trust Funds in St. Paul and Minneapolis and additional investments in affordable housing in the other jurisdictions.
- Provide funding to assist community organizations in purchasing, rehabilitating, and leasing dilapidated rental properties. Ensure that these organizations have the right of first refusal to purchase prior to outside, for-profit developers.
- Condition the distribution of grant funds to jurisdictions by the Metropolitan Council based on communities providing concrete plans to meet their fair share of the decennial affordable housing needs.
- Expand bonus point offerings in RFPs to incentivize the development of large units with three or more bedrooms.

Goal 2: Preserve the existing stock of affordable rental housing.

- Partner with the Minnesota Attorney General's office to develop land lease and other protections for residents of manufactured home communities.
- Provide restrictions on the "flipping" of affordable rental housing by outside investors. Require that 1) a large percentage of units remain affordable at deeper levels of affordability; 2) previous tenants have rights of return; and 3) displaced tenants have access to relocation services.
- Rehabilitate and maintain the existing stock of publicly owned, affordable single-family homes. Provide regular inspection and maintenance of these properties.
- Provide Advanced Notice of Sale and Tenant Opportunity to Purchase/first right of refusal for tenants of affordable housing units that are for sale.

Goal 3: Support homeownership for households of color.

- Develop partnership with local lending institutions to conduct homebuyer and financial literacy education targeted at communities of color.
- Develop a program or policy to provide for regular review of local lending practices for fair housing issues.
- Increase funding for down payment assistance programs.
- Fund and facilitate credit counseling and improvement programs targeted at communities of color.
- Provide more opportunities for families on public assistance to transition to ownership.

- Provide long-term support for communities of color beyond down payment assistance, such as additional funding programs for necessary repairs.

Goal 4: Prevent Displacement of Black and Brown low- and moderate-income residents.

- Pilot a Right to Counsel Program to provide pro bono counsel to tenants facing eviction.
- Pass localized Just Cause Eviction protections and advocate for statewide Just Cause eviction legislation.
- Advocate for statewide rent control/stabilization legislation.
- Consider the impact of transit-oriented development and preserve additional units in mixed income developments along transit corridors
- Establish a minimum nonpayment of rent threshold for evictions of $100 and adopt a rule which allows tenants to cure by paying the full amount owed up to and including the date of trial for the eviction.
- Establish a policy for regular community participation in advance of approving new development in areas populated by low- and moderate-income Black and Brown residents. To ensure maximum participation, these meetings should be held at a variety of times be accessible via public transportation, be in locations that are ADA accessible, and provide food and perhaps childcare, if the meeting occurs in the evening.
- Establish policies that provide for analysis of potential fair housing impacts of new development in areas populated by low- and moderate income Black and Brown residents.
- Conduct or contract for regular research on gentrification and displacement throughout the region.
- Provide funding for rent relief programs, foreclosure prevention programs, and small business support in distressed areas.
- Establish use of the Equitable Development Scorecard to evaluate all new residential and mixed-use development proposals.

Goal 5: Increase community integration for person with disabilities.

- Increase the supply of integrated permanent supportive housing by utilizing Project-Based Vouchers in developments that include units that have rents that are within Housing Choice Voucher payment standards as a result of inclusionary zoning programs. Require a set-aside of permanent supportive housing units through requests for proposals and notices of funding availability under the HOME Investment Partnerships programs as well as under locally-funded affordable housing programs.
- Advocate for greater funding from the Minnesota Legislature for the Developmental Disabilities Waiver in order to eliminate the need for a wait list for services under that program.
- Ensure consistency in disability-related Housing Choice Voucher preferences across housing authorities.
- Deepen enhanced accessibility requirements for developments receiving federal financial assistance to require that 10% of units be accessible to persons with ambulatory disabilities and that 4% of units be accessible to persons with sensory disabilities.
- Increase funding and availability of Metro Mobility services.

- Encourage Metro Transit to subsidize rides of caregivers assisting riders with disabilities.
- Explore the creation of more affordable transportation options, especially outside of Minneapolis and St. Paul.
- Ensure that bus stops and curb cuts are plowed and/or shoveled after snowfall.
- Increase regional cooperation among disability service providers.
- Provide additional funding to disability support service organization to ensure recruitment and retention of qualified support staff.
- Create and invest in a relief fund for landlords and tenants to apply for rehabilitation assistance related to the cost of requested reasonable accommodations.

Goal 6: Ensure equal access to housing for person with protected characteristics, lower-income, and homeless.

- Implement source of income protections throughout the Region and advocate for statewide protections.
- Eliminate participation in the Crime Free Multi-Housing program by local police departments.
- For municipalities with crime-free housing and nuisance ordinances that allow for eviction based on a number of calls for emergency service or criminal activity of tenants, condition funding on the repeal of these ordinances and advocate for statewide legislation banning these ordinances. This legislation should explicitly prohibit eviction based solely on calls for emergency service, particularly for survivors of domestic violence, victims of crime, and those experiencing health emergencies.
- Require that all rental and homeownership applications be made available in Spanish, Hmong, and Somali, and ensure that paper copies are available for those without computer access.
- Ensure that housing authorities have translation services available to their customers.
- Encourage landlords to follow HUD's guidance on the use of criminal backgrounds in screening tenants.
- The St. Paul Housing Authority should eliminate the use of a policy that allows for termination without proof beyond a reasonable doubt or a report to law enforcement.
- Following Minneapolis's example, introduce and pass legislation that requires inclusive credit screening practices that do not rely on FICO scores.
- Increase the capacity of existing fair housing enforcement agencies by providing additional funding for staff.
- Provide additional funding to increase capacity and frequency of record expungement clinics.
- Following Minneapolis's example, transition from exclusively complaint-based code-enforcement services. Provide for regular code enforcement review of all rental properties as part of rental licensing restrictions.
- Monitor school redistricting policies for those that may create new or exacerbate existing segregation patterns for communities of color.
- Establish a permanent Fair Housing Advisory Committee that will participate regularly in FHIC meetings. This committee should be made up of a diverse group of community members.

- Work with the courts to ensure that they refrain from publishing evictions immediately when filed. Courts should wait to publish evictions on a tenant's record until after a judgement has been entered.
- Work with the courts to prevent evictions from remaining on a tenant's record when the eviction has been dismissed, and reduce the amount of time evictions remain on a tenant's record from 7 years to 2 years.
- Explore capping the amount of application fees private landlords may charge and the creation of a universal rental application to reduce the difficulty of applying and the amount of fees landlords are able to charge
- Restrict the ability of landlords to evict tenants during the winter months.
- Expand services and resources for homeless families.
- Partner with community based fair housing organizations to conduct regular testing of potential discriminatory steering practices by realtors.

Goal 7: Expand access to opportunity for protected classes.

- Increase regional cooperation to encourage transit development that connects communities of protected classes to employment and reduces general transit-related isolation of these communities.
- Increase the minimum wage in the metro area to $15 an hour.
- Enact legislation to prevent landlords from requiring excessive security deposits or multiple months' rent.
- Regularly review the screening criteria of the Region's Public Housing Authorities to ensure compliance with HUD Background Screening Guidance, including criminal backgrounds, rental history, and credit history. As mentioned above, the St. Paul Housing Authority should eliminate the current policy of allowing for termination for criminal activity when the alleged activity has not even been reported to law enforcement or proven beyond a reasonable doubt.
- Relax stringent guidelines for reasonable accommodations claims to Public Housing Authorities.
- Consult with industry experts and community groups to create a Racial Justice Framework for analysis of proposed development and siting of affordable housing.
- Provide funding and staffing for public campaigns to combat NIMBY sentiment throughout the region. These campaigns should also include content to dissuade negative notions around voucher holders.

Goal 8: Reduce barriers to mobility.

- Enact policies that provide for regular reviews of residency and other preferences for fair housing impacts.
- Implement selective use of payment standards based on Small Area Fair Market Rents (FMRs), to expand housing choice specifically in zip codes that are areas of opportunity. As an example, for a Minneapolis zip code, the current payment standard for a two bedroom apartment is $1,228. For the same zip code, the Small Area FMR payment standard would be $1,820.

- Condition the receipt of public funds for any new housing development on the acceptance of vouchers and agreement not to discriminate on the basis of an applicant's receipt of public assistance.
- Enact policies providing for regular review of landlord listing services to ensure availability of units in opportunity areas.
- Implement a fair housing auditing policy for LIHTC developments overseen by Minneapolis, St. Paul, Washington County, and Dakota County, specifically assessing voucher holder marketing and access–particularly for family LIHTC housing outside of concentrated areas.
- Expand policies providing for regular landlord/developer outreach and engagement, to encourage and support participation in the voucher program, including periodic workshops and an ongoing working group.
- Institute protocols to regularly review and report on suballocators' LIHTC performance in achieving siting balance (in designated areas of opportunity), and further incentivize development in areas of opportunity through set asides, basis boost designations, and/or increased competitive points.

III. Community Participation Process

1. Describe outreach activities undertaken to encourage and broaden meaningful community participation in the AFH process, including the types of outreach activities and dates of public hearings or meetings. Identify media outlets used and include a description of efforts made to reach the public, including those representing populations that are typically underrepresented in the planning process such as persons who reside in areas identified as R/ECAPs, persons who are limited English proficient (LEP), and persons with disabilities. Briefly explain how these communications were designed to reach the broadest audience possible. For PHAs, identify your meetings with the Resident Advisory Board.

In order to ensure that the analysis contained in an AI accurately reflects conditions in a community and that the goals and strategies are targeted and feasible, the participation of a wide range of stakeholders is of critical importance. A broad array of outreach was conducted through community meetings, focus groups, and public hearings.

In preparing this AI with assistance from members of the Fair Housing and Implementation Council, the Lawyers' Committee reached out to neighborhood residents, fair housing organizations, civil rights and advocacy organizations, legal services provers, social services providers, housing developers, industry groups, tenant associations, neighborhood associations, and undocumented families to hear directly about fair housing issues affecting residents of Delaware. Additional meetings were held with public officials from the various entitlement jurisdictions and statewide agencies. All meetings took place in facilities that are accessible to persons with disabilities.

Throughout the AI process, the consultants met with over 100 organizations and individuals throughout the Twin Cities Region[1], including:

Focus Groups:

- Advocates for Persons with Disabilities:
  - MN State Council on Disability (Statewide)
  - Richfield Disability Advocacy Partnership (City of Richfield)
- Unhoused/Formerly Housed Persons:
  - Street Voices of Change (Minneapolis)
  - Freedom From the Streets (St. Paul)
- Black/African American Minnesotans:
  - National Association for the Advancement of Colored People (St. Paul Chapter)
  - National Association for the Advancement of Colored People (Minneapolis Chapter)
- Mixture of St. Paul Community Group Members:
  - Metropolitan Interfaith Council on Affordable Housing (Twin Cities Region)

[1] Note: The service are of each organization/group is noted in parentheses.

- The Mother's Tutoring Academy (Twin Cities Region)
    - Somali Mothers

Stakeholder Meetings

- Housing Justice Center (Nationwide)
- Center on Urban and Regional Affairs (Twin Cities Region)
- ARC of Minnesota (Statewide)
- Minnesota Disability Law Center (Statewide)
- Ramsey County Community and Economic Development (Ramsey County)
- Mid-Minnesota Legal Aid (Central Minnesota, including the Twin Cities Region)
- Homeline MN (Statewide)
- Inquilinxs Unidxs (Minneapolis)
- Lawrence McDonough, Pro-Bono Director, Dorsey & Whitney LLP
- Alliance for Metropolitan Stability (Twin Cities Region)
- Greater MSP: Minneapolis Saint Paul Regional Economic Development Partnership (Twin Cities Region)
- Minnesota State Attorney General's Office (Statewide)
- City of St. Paul Department of Planning and Economic Development (St. Paul)
- City of St. Paul Office of Financial Empowerment (St. Paul)
- Southern Minnesota Regional Legal Services (Twin Cities Region, excluding Hennepin County)
- City of Richfield (Richfield)
- Jewish Community Action (Suburban Hennepin County)
- Neighborhood Development Alliance (St. Paul & East Metro)
- Scott and Carver County Continuum of Care Providers (Scott and Carver County)
- Community Stabilization Project (St. Paul)
- Frogtown Neighborhood Association (St. Paul)
- Hmong American Partnership (Twin Cities Region)
- Alliance Housing MN (Minneapolis)
- City of Minneapolis (Minneapolis)

Public Hearings

- Washington County: July 21st, 4:00pm
- Minneapolis: August 10th, 6:00pm
- Dakota County: August 18th, 3:30pm
- Hennepin County: September 15th, 1:30pm
- St. Paul & Ramsey County: September 21st, 6:00pm
- Anoka County: September 22nd, 11:15am

Public Comments

In addition to public hearings, the draft AI was open for public comment across the various jurisdiction between July and October of 2020. Included below is a summary of the written public comments received and direct responses from the Consultants and FHIC Jurisdictions. The full text of each written comment can be found in the Public Comments Appendix.

- Mid-Minnesota Legal Aid (MMLS) does not receive LSC funding and is not restricted from representing undocumented individuals and strives to ensure that legal services is a viable career option.
    - *Response: The language describing MMLA as an LSC funded organization has been changed.*

- James Wilkerson notes that this report should include more cost-benefit analysis of goals and strategies in order to provide more measurable and achievable goals. Some goals, such as more public assistance support for homeownership, language access in applications, are too costly to be implemented effectively, while other goals such as source of income protection or elimination of certain income requirements that are more cost-effective should be prioritized more highly.
    - *Response: The Consultants and the FHIC thank Mr. Wilkerson for his comments on the various goals and strategies recommended in this report. The FHIC's responses to comments on specific recommendations are below:*
        - *Re: Recommendation 3: Supporting first-time home buying for households receiving public assistance is expensive. To ensure long-term benefit, many FHIC members will invest in the land trust model, which lasts at least 99 years and has protections against fraudulent loans or ballooning interest loans.*
        - *Re: Recommendation 6: We have received these requests from the Hmong and Somali community members. Both languages, although generally oral, are widely used written as well. We have not received landlord pushback. As with every recommendation in the AI, FHIC jurisdictions are not required to implement it if they identify barriers in their region.*
        - *Re: Various Tenant Protection Proposals and Source of Income Protections: Those decisions will be left to each jurisdiction and their legal department*.

- Equity in Place would like to increase the attention of this report on systemic racism in housing by acknowledging gentrification, lack of regulation of the private housing market, lack of meaningful community engagement, declining federal resources, and a lack of attention to white supremacy as Contributing Factors to Fair Housing Issues. The group recommends changing language on opportunity, access, poverty and affordability to reflect the role of power and privilege in shaping fair housing issues. They also recommend

additional goals and strategies that would increase affordable housing or adding language that affirmatively requires affordability.

- *Response: The Consultants and the FHIC appreciate Equity in Place for bringing up these very important housing related issues and agree that they are at play in the Twin Cities Region. However, the HUD Assessment Tool provides very specific language to be used and subjects to cover, so the Consultants attempted to insert these issues as relevant throughout the prescribed sections. Additionally, the Goals and Strategies section explicitly recommends jurisdictions both preserve the existing supply of affordable housing and increase funding for new affordable housing units at deeper affordability and in a range of unit sizes.*

- Southern Minnesota Regional Legal Services (SMRLS) called attention to *In the Matter of Cindi Ali*, 938 N.W.2d 835 (Minn. 2020), which held that a certain kind of assistance issued by the Consumer Directed Community Support program was included in income and prevented the family from qualifying for voucher assistance. They request clear guidance from Minnesota DHS about the structure of this program to increase housing opportunity for families with developmentally disabled children.
    - *Response: The Consultants and the FHIC are grateful to SMRLS for calling attention to a recent Minnesota Supreme Court decision that greatly reduces housing choice for those with disabilities, and suggest that SMRLS and individual jurisdictions follow up with MN DHS directly for explicit guidance on the Consumer Directed Community Support program and its requirements to ensure access.*

- The Metropolitan Interfaith Council on Affordable Housing (MICAH) registered concerns with community input and requested more clear specific benchmarks, timelines, outcomes and resources for the goals and strategies.
    - *Response: The Consultants appreciate MICAH's assistance with the community engagement process to ensure that it was robust in duration and variety of people represented. The community engagement process greatly informed this report and the corresponding goals and strategies. Regarding those goals, the Consultants would emphasize that as a regional analysis, the report was designed to offer FHIC jurisdictions an explanation of housing barriers identified and generalized solutions to address them. It will be up to each jurisdiction to develop the specific plans for adoption and implementation of those goals, as it was not for the FHIC as a whole or for Consultants alone to designate for each jurisdiction. We encourage MICAH and its members to follow up with specific jurisdictions down the line for progress updates on specific goals and strategies.*

- The Institute on Metropolitan Opportunity notes that the AI Draft should include more robust discussion of two specific housing complaints issued in the last few years, more specific and accurate analysis of gentrification in the Twin Cities, and strategies that are better aligned with goals including increasing the supply of affordable housing in high

opportunity areas, expanding access to opportunity for protected classes, and reducing barriers to mobility. Recommendations include discussion of the aforementioned housing complaints, expanded research on gentrification in the Twin Cities region, and targeted strategies.

- *Response: The AI includes discussion of all fair housing and/or discrimination related complaints against the jurisdictions who are the subject of this analysis, meaning entitlement jurisdictions who are members of the FHIC. Additionally, the Consultants recognize the competing understandings of gentrification and displacement in the Twin Cities region between the Institute on Metropolitan Opportunity and other research and advocacy organizations. The Consultants do not adopt one approach over the other in this report, basing our findings related to displacement and its various causes on rental market data, investment and construction planning documents, and anecdotal evidence from the community engagement process.*

IV. Assessment of Past Goals, Actions and Strategies

a. Indicate what fair housing goals were selected by program participant(s) in recent Analyses of Impediments, Assessments of Fair Housing, or other relevant planning documents.

The 2014 Regional Analysis of Impediments for the Twin Cities Region identified the following impediments to fair housing choice and provided recommended action steps to address each.

1. **Impediment: Potential homebuyers of color are denied for home purchase loans at rates exceeding White homebuyers.**

   Recommendations:
   1.1. Development of partnerships with reputable credit counseling agencies and financial literacy trainers to reach communities of color and create pipeline of potential homebuyers who are ready and qualified to purchase a home.

Minneapolis: The City of Minneapolis, through its Minneapolis Homes suite of programs, strives to reduce income disparities by building the capacity of underrepresented homebuyers, homeowners and developers to participate in City programs. Minneapolis Homes provides financing for financial wellness, homebuyer education and foreclosure prevention counseling. The City provides financial support to the Minnesota Homeownership Center to provide services through a network of providers for one-on-one counseling, online tutorials and in-person classes in a variety of languages, including Hmong, Spanish, Somali and English.

Hennepin County: The County partnered with Community Action Partnership Hennepin County to help inform potential homebuyers how to develop a strong credit history through financial counseling to become home ownership ready.

Scott County: The County has partnered with Comunidades Latinas Unidas en Servicio (CLUES) and the Neighborhood Development Alliance to conduct housing counseling training. They are working on a similar partnership with the African Development Center.

Saint Paul: The City of Saint Paul financially supported the Minnesota Homeownership Center (Center) which offers individualized financial wellness and home buyer counseling, homebuyer education classes (*Home Stretch* workshops), which included multicultural and multilingual homebuyer classes. Homeownership workshops were held in English, Hmong, Somali, Karen, and Spanish. The Center also works directly with the African Development Center and African Economic Development Solutions to outreach to Somali and Africans new to America.

Subsequently, Fannie Mae worked with the Center's *Framework* in which households who purchase Fannie Mae properties through its *HomeReady Buyer* program will be eligible for up to 3% off the purchase price of the home in the form of closing cost assistance.

The City also created a down payment assistance program to promote homeownership for households at or below 60% AMI.

Washington County: The Washington County CDA continues to develop relationships with organizations in order to increase the number of households of color the CDA serves. Such partnerships include the Black Women's Wealth Alliance in which it provided Home Stretch Workshops that were culturally sensitive to historical racism many people of color experienced/experience in North Minneapolis and how to overcome these obstacles. Additionally, the CDA shares affordable housing opportunities, affordable loan programs, and down payment assistance opportunities within Washington County with organizations that serve a larger population of persons of color including PRG, Build Wealth MN, Comunidades Latinas Unidas en Servicio (CLUES), Neighborhood Development Alliance (NEDA), Urban League of Minneapolis, and Twin Cities Habitat for Humanity. The CDA has and continues to commission an updated report on the comprehensive housing needs for Washington County to better understand who the underserved populations are within the County and what obstacles they encounter in obtaining affordable and fair housing. The CDA continues to offer homebuyer education workshops geared towards educating specific cultural communities with lower rates of homeownership.

Dakota County: Through the homebuyer and homeownership resource connection at the Dakota County CDA, homeownership counselors assisted potential homebuyers of color and helped prepare them for long-term homeownership success.

- The First Time Homebuyer (FTHB) program offers competitive 30 year fixed first mortgage loans, with down payment and closing cost assistance.
- The Dakota County CDA advertises Homebuyer Education and Counseling services and the First Time Homebuyer program on its website.
- Homebuyer Education and Counseling services at the Dakota County CDA continued to be promoted at Dakota County community events and fairs, city offices, libraries, churches, and social service agencies.
- The Dakota County CDA does direct outreach to potential lender and realtor partners within Dakota County to make sure the CDA FTHB program is widely available and that industry partners are aware of Homebuyer Education and Counseling services.
- The Dakota County CDA is a member of SPAAR (Saint Paul Area Association of Realtors) Diversity Committee and MN Homeownership Alliance. The SPAAR Diversity Committee serves as an advocate of fair housing practices and promotes equal opportunities in housing and further diversification within the real estate industry to better serve association members and their communities.
- Annually, the Dakota County CDA mails information on Homebuyer Education and Counseling services and the FTHB program to all Dakota County CDA residents within their Workforce Housing and Public Housing units. The Dakota County CDA tracks both program demographics to ensure they are reaching a diverse clientele that is reflective of Dakota County demographics overall. The Dakota County CDA strives to reach deeper into minority and Hispanic households with these programs than the overall County demographics, but presently the Dakota County CDA is looking to ensure the programs are at least as representative as the County as a whole. For its most recent program year, 47 percent of the clients served by Dakota County CDA housing counselors were clients of color. Among all clients served, 44 percent were below the 50 percent AMI income threshold. The demographics of the Dakota County CDA's First Time Homebuyer Program have remained in line with overall Dakota County

demographics, with 12 percent of borrowers representing minority households. The most common barriers preventing housing counseling clients from qualifying for a mortgage product are income restraints and credit issues, and the Dakota County CDA is actively working with clients, in collaboration with industry partners, to provide budget and credit counseling support for clients that need to address these barriers to achieve mortgage-readiness.

1.2. Support local research effort in homeownership loan denial disparity by race that accounts for creditworthiness, as limited data is currently available.

All Jurisdictions: Regional analysis has been done by Dr. Samuel Myers at the University of Minnesota.

2. **Impediment: Higher rates of exit from homeownership among households of color.**
   Recommendations:
   2.1. Support foreclosure prevention services targeted to households of color.
   2.2. Promotion of homebuyer education services to minimize subsequent delinquency.

Washington County: The County has a partnership with the Black Women's Wealth Alliance in which it provided Home Stretch Workshops that were culturally sensitive to historical racism many people of color experienced/experience in lending specifically in North Minneapolis and how to overcome these obstacles and have a higher likelihood of successful homeownership.

The CDA promotes and encourages expanded opportunities for homebuyer education, housing counseling, affordable housing opportunities, affordable loan programs, and down payment assistance opportunities within Washington County with organizations that serve a larger population of persons of color including PRG, Build Wealth MN, Comunidades Latinas Unidas en Servicio (CLUES), Neighborhood Development Alliance (NEDA), Urban League of Minneapolis, and Twin Cities Habitat for Humanity. The CDA does not require clients to receive Homebuyer counseling and education at the CDA in order to qualify for down payment assistance but does require counseling and education be done by a HUD approved Housing Counseling agency. This gives potential clients freedom of choice, easier access to housing related programs, and less restrictions on where they can obtain homebuyer counseling and education opportunities in order to access our programs.

2.3. Explore concept of post-purchase counseling to minimize delinquency.
2.4. Market and promote foreclosure prevention services to households of color.
2.5 Promote and encourage expanded opportunities for housing counseling specifically directed at protected classes.

Hennepin County: Hennepin County's Housing and Redevelopment Authority funded homeownership centers, and continues to fund foreclosure prevention programs.

Dakota, Scott, Washington Counties: All three counties fund homeownership education and foreclosure prevention programs.

Dakota County: Foreclosure literature was and will continue to be mailed to recipients of Pre-Foreclosure Notices and Notices of Pendency educating them about the foreclosure process and the services offered by the Dakota County CDA. Dakota County CDA staff provided free Foreclosure Advising services to any Dakota County resident facing the possibility of foreclosure. (see above under 1.1) Through the homebuyer and homeownership resource connection at the Dakota County CDA, homeownership counselors assisted potential homebuyers of color and helped prepare them for long-term homeownership success. ….

Saint Paul: The City of St. Paul is one of several HUD-approved housing counseling agencies providing counseling in the City of St. Paul under the umbrella of the Minnesota Home Ownership Center (MNHOC). The network of agencies providing mortgage default/early delinquency counseling in the city of St. Paul assist households with guidance and assistance for submission of mortgage modifications, working with their mortgage servicer on a smooth transition out of the home (short sale or deed in lieu of foreclosure), and providing information about the foreclosure process and moving on after foreclosure.

The network of agencies provides individualized mortgage foreclosure prevention counseling by working with the homeowner to create an action plan and viable budget. In addition, the housing advisers provide referrals to community resources, such as food shelves, formal budget counseling, bankruptcy counseling, legal aid and as necessary emergency assistance from Ramsey County. Most importantly, the network of agencies assists homeowners in default by communicating with mortgage servicers for modifications, forbearance agreements, or repayment plans, taking the burden of communication off the homeowner.

Minneapolis: The City of Minneapolis provides funding to the Minnesota Home Ownership Center for foreclosure prevention counseling and homebuyer education services for Minneapolis residents.

3. **Impediment: Homeownership perceived as unattainable by some households of color.**
   Recommendation:
   3.1. Pursue increased local jurisdiction partnerships with agencies dedicated to expanding homeownership equity and reducing the homeownership gap.

Anoka County: In 2018, the County acquired four single-family homes for rehabilitation and sold them to non-profits that provide low-to-moderate income housing. The County also used CDBG funds to assist 17 low- or moderate-income families rehabilitate their homes.

Dakota County: Since 2015, the Dakota County CDA has provided down payment assistance to 173 households. Homebuyers purchasing their first home in Dakota County can access: Fixed interest rate mortgage financing, Mortgage Credit Certificate, $8,500 in down payment and closing cost assistance, and Reduced Private Mortgage Insurance (PMI) with our conventional HFA preferred mortgage. Dakota County CDA has also partnered with Twin Cities Habitat for Humanity to redevelop vacant NSP lots which are then sold to qualified low income homebuyers.

Hennepin County: From 2015- 2019 the County has heavily invested in affordable housing land trusts through the West Hennepin Affordable Housing Land Trust (WHAHLT) and supported the acquisition and resale of 35 single family homes within suburban Hennepin County. Almost half of these units were resold to households of color. City of Lakes Community Land Trust (CLCLT), Habitat for Humanity, Urban Home Works, and other organizations have been funded with County funds to support home ownership of people of color. The County's Affordable Housing Incentive Fund has also funded home ownership opportunities for people of color. Finally, Hennepin County has invested CDBG funds for direct homebuyer assistance programs in the cities of Richfield and Brooklyn Center.

Eden Prairie: From 2015-2017, Eden Prairie provided down payment assistance to 10 households. The City also provided varied housing assistance programs to 281 low- to moderate-income households. Three homes were also purchased and re-sold using funds from the Affordable Housing Trust Fund.

Minneapolis: Minneapolis offers down payment and closing cost assistance for the purchase of homes that are financed through the Minneapolis Homes real estate production suite of products to overcome barriers to ownership. HOM funds are reserved for participants in financial wellness counseling. Grow North provides people who work in North Minneapolis with down payment assistance to purchase a home in North Minneapolis. The Homebuyer Incentive provides forgivable loans to homeowners who purchase a City-owned vacant lot to develop their own home. The rate of service to BIPOC households through the City's down payment assistance programs more than doubled from 2015 to 2018. The City is also contemplating changes to its Minneapolis Homes Program to create more long-term affordability options for homeownership.

Plymouth: Since 2015, Plymouth provided down payment assistance to 10 households through its First Time Homebuyer program.

Woodbury: The City of Woodbury still operates a first time homebuyers program but has seen a recent uptick in "renters by choice."

Metropolitan Council: The Met Council operates affordable homeownership workshops with several municipalities in the region.

Saint Paul: The City of Saint Paul, along with the City of Minneapolis, participated with HOCs *Home Ownership Alliance* (HOA) initiative, a collaboration of more than 30 organizations committed to equitable homeownership for people of color and lower-income households. The HOA brings together organizations that represent a range of communities, including the Neighborhood Development Alliance, and NeighborWorks Home Partners and Twin Cities Habitat for Humanity. The HOA leverages these partnerships to create paths for underserved communities to achieve equitable, affordable homeownership.

An example of the HOA's collaborative innovation is the launch of the "Get Ready. Be Ready" campaign to reach African Americans in St. Paul's East Side and North Minneapolis. To reach these potential homeowners, the HOA works with community representatives to create key messages addressing known myths about homeownership, and invest in community radio and print

media, along with social media and outreach to community leaders. In the coming year, there are plans to expand this outreach to other populations affected by a lack of access, including East African, Hispanic, and Southeast Asian communities.

The HOA is also advocating for systems change in the very programs intended to advance affordable homeownership. Research has shown that the existing down payment assistance (DPA) ecosystem is inconsistently funded, limits consumer choice, and hinders buyers' ability to compete in a tight market. Further, lenders can be reluctant to work with complex programs with varying features, and cite uncertainty about compliance with the secondary market as an obstacle to working with DPA programs.

The City also created a down payment assistance program to promote homeownership for households at or below 60% AMI.

Washington County: The Washington County CDA developed a down payment assistance program with a goal that at least 50% of the loans will go to households of color and/or those at or below 64% of the area median income. The loan is deferred and interest free as to not add to frontend housing costs, help lower first mortgage payments, help buyers reach minimum down payment requirements better loan products may offer, and help promote successful homeownership. In the past five years, CDBG funds have been allocated to the Home Improvement Loan Program which assisted 31 low-to moderate income households with necessary health and safety repairs to their homes.

4. **Impediment (Hennepin County, Ramsey County, City of Minneapolis, and City of St. Paul): Predatory lending practices towards immigrants, communities of color, and disabled households, in the form of contract-for-deed.**
   Recommendations:
   4.1. Development of partnerships with local lending institutions, encouraging affirmative marketing and funding for homebuyer programs that reach new Americans, communities of color and the disabled.
   4.2. Partner with local programs educating contract-for-deed purchasers in new American communities, communities of color and households with disabled members about the process with a special focus on the additional protections under Minnesota Statutes §559.202 that went into effect for contracts entered into after August 2013.

Hennepin County: In every home ownership program that Hennepin County funds, the County never uses and avoids the contract for deed model and requires a fixed interest rate for home purchases.

Minneapolis: Participated in the Minnesota Homeownership Opportunity Alliance, which specifically looks at barriers to homeownership experienced by different cultural communities, affirmative marketing to overcome culturally specific barriers, and product development to fill the gaps in service experienced by underserved communities. Focus to date included Black/African-American, Black immigrant (Somali, Ethiopian, etc.), and Muslim households. Focus in 2020 is Hispanic/Latinx households. Participated in a study with the Twin Cities Local Initiatives Support Corporation to assess product development options to better serve borrowers whose faith is averse

to mortgage loans with interest. Provides funding to the Minnesota Homeownership Center, which provides homebuyer education in multiple languages through multiple organizations that have cultural competencies servicing communities of color and new American communities.

St. Paul: The City of Saint Paul financially supported the Minnesota Homeownership Center (Center) which offers individualized financial wellness and home buyer counseling, homebuyer education classes (Home Stretch workshops), which included multicultural and multilingual homebuyer classes. Homeownership workshops were held in English, Hmong, Somali, Karen, and Spanish. The Center also works directly with the African Development Center and African Economic Development Solutions to outreach to Somali and Africans new to America.

Additionally, the City of Saint Paul participated with HOCs Home Ownership Alliance (HOA) initiative, a collaboration of more than 30 organizations committed to equitable homeownership for people of color and lower-income households. The HOA brings together organizations that represent a range of communities, including the Neighborhood Development Alliance, and NeighborWorks Home Partners and Twin Cities Habitat for Humanity. The HOA leverages these partnerships to create paths for underserved communities to achieve equitable, affordable homeownership.

5. **Impediment: Housing choices for people of color are impacted by perceptions about school performance and neighborhood safety.**
   Recommendations:
   5.1. Conduct paired testing to see if race influences neighborhood recommendations in the homebuying process.
   5.2. Develop outreach and education strategies based on results of paired testing.

All Jurisdictions: The Fair Housing Implementation Council jurisdictions were counseled against paired testing due to a recent Minnesota Supreme Court decision. Hennepin County still conducts standard rental testing.

6. **Impediment: Limited number of rental units with 3+ bedrooms.**
   Recommendation:
   6.1. Support extra points in RFP processes for development proposals that include a higher proportion of units with 3+ bedrooms.

Met Council: The Met Council provides extra points for RFPs submitted for Livable Communities Grant funds.

Hennepin County: The County provides extra points in accordance with this recommendation.

Minneapolis: The City provides extra points in accordance with this recommendation for RFPs submitted for Affordable Housing Trust Fund dollars and through QAP.

Eden Prairie: The City remains active in promoting larger bedroom developments.

St. Paul: To encourage the development of 3+ bedroom units, extra points will be awarded to tax credit projects that promote family housing where 25% of more of the units in the project have three or more bedrooms.

Washington County: The Washington County CDA is a sub allocator of tax credits, the CDBG administrator for Washington County and a member of the Dakota County HOME Consortium. In its CDBG and HOME application processes, the CDA awards extra points for projects that are proposing creation or rehabilitation of housing units that serve large related families (5+ persons) and/or has family friendly components.

7. **Impediment: High rental application denial rate in communities of color and those with disabilities based on rental selection criteria (criminal background, credit history, rental background).**
   Recommendations:
   7.1. Provide education for landlords on how to create policies that allow for adapting rental criteria for renters with difficult backgrounds through exceptions. Education focused on considering exceptions based on length of time since the barrier was created, nature of the offense, how to minimize risk, and working with renters that have access to supportive services. Also offer education on which type of police calls impact a landlord's rental license.

St. Paul: The Department of Safety and Inspections requires all new Certificate of Occupancy holders to attend a "Landlord 101" training course, which covers fair housing, tenant screening, and landlord/tenant responsibilities, among other modules.

As part of the QAP, projects are required to have a Tenant Selection Plan, which addresses criminal history. A condition of receiving LIHTC through the St. Paul HRA is developing a criminal background screening process that implements 2016 HUD Guidance. In 2020, the City introduced a set of tenant protection policies including tenant screening guidelines that address criminal, credit, and rental history, as well as limits on the upfront costs of rental housing.

Dakota County: Dakota County provided education to landlords and tenants on rights and responsibilities.

Washington County: Washington County provided education for landlords on how to create policies that allow for adapting rental criteria for renters with difficult backgrounds through exceptions, education focused on considering exceptions based on length of time since the barrier was created, nature of the offense, how to minimize risk, and working with renters that have access to supportive services, and education on which type of police calls impact a landlord's rental license.

7.2. Provide education for renters, human service professionals, and community organizations on rental selection criteria and how to effectively communicate with landlords.

Washington County: The County co-produced ECHO Fair Housing Videos: In collaboration with cities and counties in the Twin Cities Metro, production "A good, safe place to live." The videos

are 5-minute digital shorts in English, Spanish, Somali, Karen, and Hmong to help new Minnesota renters understand their rights and responsibilities as tenants. The video provides basic knowledge of the laws that protect them, around discrimination, home safety and potentially predatory landlords.

Dakota County: The ECHO rental fair housing video "A Good, Safe Place to Live" is available on the Dakota County CDA website in five languages that include English, Spanish, Hmong, Somali and Karen. The Dakota County CDA contributed funding to the creation of the videos and continues to market the ECHO rental fair housing video/program. The videos help new Minnesotans understand their rights and responsibilities as tenants, Twin Cities PBS (TPT) program "ECHO" produced a short video in five languages, covering the basics of tenant and landlord rights and obligations. The program "A Good, Safe Place to Live" is available in these languages: Hmong, Karen, Somali, Spanish and basic English. The program was developed in collaboration with more than thirty community and governmental partners, including housing and redevelopment authorities and community development agencies from the seven-county metro area, as well as legal aid organizations, state housing authorities and others. The program premiered statewide on TPT's Minnesota Channel on April 11, 2016, and is also available on DVD, and online at tpt.org/echo. In addition, a curriculum for English Language Learning classrooms is in development, allowing adult learners to discover more about housing issues while mastering English. Furthermore, ECHO plans to pair its cultural outreach coordinators with educators around the state to help communities absorb this important information.

Dakota County Social Services staff provides and distributes tenant and landlord marketing materials with a clear message about available assistance to resolve housing crises and prevent homelessness. The goal is to have this information provided at lease signing or other interactions between landlords and tenants to encourage them to refer tenants to resources instead of resorting to eviction. The tenant information is in English, Spanish and Somali.

FHIC: The FHIC funded a project completed by Southern Minnesota Regional Legal Services housing discrimination attorneys and staff who partnered with seven local organizations serving immigrant communities and conducted nine fair housing trainings with 169 attendees. The trainings focused on renters' rights and responsibilities and fair housing law. The trainings were also highly visual. Additionally, even though the trainings were directed toward the clients of the agencies, the staff of the agencies also received the same information which allows the staff to better assist their clients.

7.3. Encourage police departments to clearly explain the use of police call records in rental license programs, including the types of calls (domestic violence and medical emergencies) excluded from rental license regulations.
7.4. Provide fair housing education for Crime Free Multi-Housing program educators and local police departments.

Hennepin County: The County encourages landlords in the non-Minneapolis municipalities to change their screening criteria. Many suburban Hennepin County cities have passed tenant protection ordinances including Saint Louis Park, Brooklyn Park, Brooklyn Center, and other

cities, Hennepin County does not have the jurisdiction to enforce tenant protections without the city participation.

Minneapolis: The City adopted an ordinance in 2019 that provide increased tenant protections during the screening process. Tenants cannot be denied for misdemeanor convictions older than three years, felony convictions older than seven years, and serious offenses older than ten years, with some exceptions. The ordinance also prohibits the use of a credit score to deny applicants and places a cap on security deposits. In 2018, the City updated its Conduct on Licensed Premises Ordinance to change the way properties are classified as "disorderly" to attempt to reduce negative consequences on tenants.

Woodbury: The City provides fair housing training to property managers of licensed rental properties.

Dakota County: The Dakota County CDA annually hosts a Fair Housing Training with an attorney in the Fall. The training is targeted to area landlords and property owners to discuss a variety of issues related to rental housing and the Housing Choice Voucher program, as well as fair housing and equal access to housing. An attorney specializing in fair housing law presents information to ensure that the landlords and property owners receive the most current, accurate information regarding fair housing. The Dakota County CDA holds monthly landlord/owner workshops about the HCV Program for rental property owners and landlords that provide tools, tips and information on requirements and policies. Fair housing information is also included.

Scott County: The Scott County CDA partnered with the University of Minnesota through a program called Resilient Communities. Students worked with County staff to develop educational programming for both residents and landlords. The CDA also hosts 2-3 landlord workshops a year. In response to concerns that landlords don't want to rent to HCV holders because they do not keep their units clean, the U of M students developed a brochure for residents on how to keep their units clean.

Carver County: The County has provided annual fair housing training for service providers for the last three years. Additionally, 2019 was the beginning of an annual fair housing training for landlords operating within the county.

8. **Impediment: Inability to place tenant based rental assistance vouchers for those with disabilities, households with children, and households of color, including but not limited to Housing Choice Vouchers.**
   Recommendations:
   8.1. Market and promote the benefits of accepting tenant based rental assistance to landlords and the unique characteristics of programs beyond Housing Choice Vouchers.
   8.2. Assist voucher holders in their housing search by referring them to resources that list properties where Housing Choice Vouchers may be accepted.

Washington County: The CDA has a vacancy list in the County that is updated with units that are available for rent. It also indicates whether or not that landlord is willing to accept a Housing Choice Voucher. On its website, there is a section specifically for resident resources.

8.3. Develop and share strategies and best practices about how landlords can have a successful experience renting to those with tenant-based rental assistance.

Minneapolis: The City has a pool of landlords that are known for their acceptance of vouchers. The City also passed an ordinance barring discrimination against rental assistance recipients, including Housing Choice Voucher holders, but enforcement is currently stayed pending a legal challenge. The City requires that any housing that receives city assistance accept Housing Choice Vouchers. The City requires all projects that receive City assistance to post vacancies on HousingLink.

The City led the creation of the Stable Homes Stable Schools Program, a collaborative effort of the City of Minneapolis, the Minneapolis Public Housing Authority, the Minneapolis Public Schools and Hennepin County Health and Human Services to provide funding and services for families experiencing homelessness or facing the threat of losing their home. Hennepin County and the YMCA contribute to the program by providing essential support services to help families succeed. The City, together with MPHA, is doing extensive landlord outreach, including direct mailings and one-on-one meetings with landlords, to share information about the program to find rental units for families. The program has been running for a year and has already assisted hundreds of children.

Bloomington, Metropolitan Council, Hennepin County: These jurisdictions have mobility counseling to assist voucher holders in their housing searches.

Dakota County: The Dakota County CDA maintains a list of owners that are willing to lease a unit to an eligible HCV family or to help the HCV family find a unit and will provide this list to the HCV family as part of the informational briefing packet. The Dakota County CDA holds monthly landlord/owner workshops about the HCV Program for rental property owners and landlords that provide tools, tips and information on requirements and policies. Fair housing information is also included. All Dakota County CDA activities that may affect an owner's ability to lease a unit will be processed as rapidly as possible, in order to minimize vacancy losses for owners. The CDA holds an annual owners' conference to discuss any program changes and new topics as well as provide an opportunity for owners to ask questions, obtain written materials and meet program staff. The CDA provides owners with a handbook that explains the program, including HUD and CDA policies and procedures, in easy-to-understand language. The CDA gives special attention to helping new owners succeed through activities such as:

- The CDA requires first-time owners (or their agents) to participate in a briefing session on HAP contract requirements.
- Provides the owner with a designated CDA contact person.
- Provides other written information about how the program operates, including answers to frequently asked questions.
- Provides program information as well as frequently used forms on the CDA Website.

Washington County: The CDA offers a landlord handbook that offers strategies and best practices about how landlords can have a successful experience renting to those with tenant-based rental assistance.

8.4 Entitlement jurisdictions shall include in the contract documents of rental housing developments funded in whole or in part by public financing language prohibiting property owners from rejecting rental applications due to an applicant's receipt of public assistance.

St. Paul: The City continues to require Small Rental Rehab, 4d and HOME projects to accept housing choice vouchers. In addition, the City created the Families First rent supplement program, which provides a monthly rent subsidy of $300.00 per month for up to three years.

Dakota County: The Dakota County CDA Housing Finance Policy includes the requirement for housing projects financed with private activity bonds, 501(c)(3) bonds, refunding bonds, Low Income Housing Tax Credits, Tax Increment Financing and HOPE funds (a local gap financing source) to participate in the Section 8 Program (aka HCV). The developer is required to sign an agreement that while the bonds/loan/agreement are outstanding, they will not exclude from consideration qualified families receiving assistance from the Section 8 program.

9. **Impediment: Development processes in local government can limit construction of affordable housing and housing for people with disabilities.**
   Recommendations:
   9.1. Encourage practices that maximize local government, HRA, CDA, and/or EDA resources that enable housing development for protected classes.
   9.2. Review strategies proposed in Urban Land Institute/Regional Council of Mayor's "Reinvesting in the Region: (Re)Development-Ready Guide" available at http://minnesota.uli.org/wp-content/uploads/sites/31/2012/06/ULI-MNReDevelopment-Ready-Guide-May-2012.pdf or in HUD's Regulatory Barriers Clearinghouse: http://www.huduser.org/portal/rbc/home.html with local government staff.

Saint Paul: The City amended it zoning code to increase housing density in high-use transportation corridors to increase housing development. The City's amended Zoning Code does not impose conditional use permits for supportive housing which is classified as apartments and has increasingly allowed for rezoning for increased building heights; requirements for parkland dedication as a mechanism to ensure adequate par amenities for all residents are reduced for affordable housing developments; Accessory Dwelling units (ADU are now allowed throughout the city; and the Sustainable Building Regulations Ordinance establishes sustainable building regulations for buildings owned, operated or funded by the City ensuring energy efficiency and sustainability and this lower costs for building owners and tenants.

Additionally, Saint Paul's affordable housing policies must comply with the American with Disabilities Act (ADA) when developing multi-family housing projects with 5 or more units; resulting in the creation of more accessibly designed rental housing units.

10. **Impediment: NIMBY-ism with regard to siting and placement of affordable housing.**
    Recommendations:
    10.1. Continue to design and manage affordable housing such that it can overcome initial community opposition.

10.2. Analyze how nationwide deconcentration strategies and best practices related to housing and transportation impact fair housing protected classes.
10.3. Review strategies proposed in Urban Land Institute/Regional Council of Mayor's Reinvesting in the Region: (Re)Development-Ready Guide available at http://minnesota.uli.org/wp-content/uploads/sites/31/2012/06/ULI-MNReDevelopment-Ready-Guide-May-2012.pdf or in HUD's Regulatory Barriers Clearinghouse: http://www.huduser.org/portal/rbc/home.html.

Hennepin County: The County is investing and supporting a communications team in housing to spread the word and message that affordable housing is important and essential to our community. The Communications team has conducted an educational campaign to inform the public on the importance and breaking the stereotypes of affordable housing.

Minneapolis: The City is creating new mechanisms through land use policy and zoning to increase housing density, require more affordable units and allow for more housing types throughout the city. Minneapolis 2040 and Inclusionary Zoning Ordinance and policy are in effect as of January 1, 2020. Minneapolis 2040 was informed by more than three years of engagement with the people of Minneapolis, including over 150 meetings and conversations with thousands of residents, business owners and community members.

The City has taken steps to reduce the cost of developing affordable housing, including zoning text code amendment to allow triplexes, parking reductions, and the ADU ordinance.

Saint Paul: The City amended it zoning code to increase housing density in high-use transportation corridors to increase housing development. The City's amended Zoning Code does not impose conditional use permits for supportive housing which is classified as apartments and has increasingly allowed for rezoning for increased building heights; requirements for parkland dedication as a mechanism to ensure adequate par amenities for all residents are reduced for affordable housing developments; Accessory Dwelling units (ADU are now allowed throughout the city; and the Sustainable Building Regulations Ordinance establishes sustainable building regulations for buildings owned, operated or funded by the City ensuring energy efficiency and sustainability and this lower costs for building owners and tenants.

Fair Housing Advisory Committee Recommendations

Following the conclusion of the formal AI process, several community groups expressed concern that the community engagement process did not sufficiently consult communities of color and other marginalized groups. As a result, Fair Housing Advisory Committee was formed, and an Addendum to the 2014 Analysis of Impediments to Fair Housing Choice was drafted. The impediments identified and the recommendations made to address them include:

Impediment: Access to housing is reduced for some groups.
Recommendations:

- Work toward enactment of local source of income protection legislation that specifically covering voucher holders.

- Collect and present local data to elected officials illustrating the need for source of income protection; advocate for such local legislation.
- Based on results of Responsible Banking study from U of M, withhold government business from poor-performing financial institutions.
- Develop partnerships with credit counseling agencies to reach communities of color and build a pipeline of potential homebuyers.

Plymouth: The City of Plymouth ensures applications for housing program assistance are available both online and in hard copy, and advertises for both options through numerous community organizations and a variety of mediums.

Woodbury: The City amended its program guidelines across all to require that participants in the Woodbury First-Time Homeownership Program obtain pre-purchase counseling.

- Ensure applications for housing program assistance are available online as well as in hard copy and that both options are advertised.

Minneapolis: The City eliminated single-family zoning. The City adopted a source of income protection ordinance in 2017. It is currently enjoined pending litigation. Pursuant to Title 2, Chapter 16 of the Minneapolis Code of Ordinances relating to Administration: Finance as amended, the City banking relationships are required to provide information related to home mortgage lending and other fair lending activities. This information is gathered through a Financial Institution Disclosure Form submitted to the City annually. This form solicits data for the City of Minneapolis, by census tract, and provides the information required on the mortgage loan disclosure statement pursuant to the Home Mortgage Disclosure Act, 12 U.S. C. Section 2801 et seq. and laws amendatory thereof and supplementary thereto ("HMDA"), for the previous fiscal year.

Proposers for our recent banking services RFP were required to complete the Financial Institution Disclosure Form and this information was taken into consideration during the evaluation process. The City is working with our current depository and winner of the recent Banking RFP to enhance housing affordability by reducing the cost burden of housing and increasing access to safe, affordable places to live, including transitional housing, rentals, and home ownership, with a focus on individuals and families historically shut out of the market.

At the City's invitation, Wells Fargo is committing to participate, on a best efforts basis, in 2 informational sessions or small group meetings per year, convened by the City, to discuss its affordable housing/mixed income housing lending activity in Minneapolis. Wells Fargo participants will share feedback on affordable housing lending in mixed income developments and any City loan programs in which Wells Fargo participates.

- Wells Fargo may also hold its own convenings on issues related to affordable housing, which may include participation by nonprofit organizations and affordable housing developers. Wells Fargo will invite appropriate City staff/officials to participate in these convenings to provide additional partnership and networking opportunities in the areas of affordable housing development and financing.

- The City of Minneapolis, through its Minneapolis Homes suite of programs, strives to reduce income disparities by building the capacity of underrepresented homebuyers, homeowners and developers to participate in City programs. Minneapolis Homes provides financing for financial wellness, homebuyer education and foreclosure prevention counseling. The City provides financial support to the Minnesota Homeownership Center to provide services through a network of providers for one-on-one counseling, online tutorials and in-person classes in a variety of languages, including Hmong, Spanish, Somali and English.

Multiple Jurisdictions: Several communities are in the process of considering mixed land uses to allow for more housing development.

Hennepin County: The County has modified its homeowner rehabilitation loan program to be more accessible to those of the Muslim faith, moving from an interest-based program, which is banned in Islam, to a fee-based program.
Richfield: The City of Richfield is flexible when it comes to mixed-status households for homebuyer assistance programs.

Bloomington: The City of Bloomington operates a "Learning to Lead" program that is designed to help local residents, specifically diverse residents, become more civically engaged. Program applications are available in Somali and Spanish.

Dakota County: Through the homebuyer and homeownership resource connection at the Dakota County CDA, homeownership counselors assisted potential homebuyers of color and helped prepare them for long-term homeownership success.

- The First Time Homebuyer (FTHB) program offers competitive 30 year fixed first mortgage loans, with down payment and closing cost assistance.
- The Dakota County CDA advertises Homebuyer Education and Counseling services and the First Time Homebuyer program on its website.
- Homebuyer Education and Counseling services at the Dakota County CDA continued to be promoted at Dakota County community events and fairs, city offices, libraries, churches, and social service agencies.
- The Dakota County CDA does direct outreach to potential lender and realtor partners within Dakota County to make sure the CDA FTHB program is widely available and that industry partners are aware of Homebuyer Education and Counseling services.
- The Dakota County CDA is a member of SPAAR (Saint Paul Area Association of Realtors) Diversity Committee and MN Homeownership Alliance. The SPAAR Diversity Committee serves as an advocate of fair housing practices and promotes equal opportunities in housing and further diversification within the real estate industry to better serve association members and their communities.

Annually, the Dakota County CDA mails information on Homebuyer Education and Counseling services and the FTHB program to all Dakota County CDA residents within their Workforce Housing and Public Housing units. The Dakota County CDA tracks both program demographics to ensure they are reaching a diverse clientele that is reflective of Dakota County demographics overall. The Dakota County CDA strives to reach deeper into minority and Hispanic households

with these programs than the overall County demographics, but presently the Dakota County CDA is looking to ensure the programs are at least as representative as the County as a whole. For its most recent program year, 47 percent of the clients served by Dakota County CDA housing counselors were clients of color. Among all clients served, 44 percent were below the 50 percent AMI income threshold. The demographics of the Dakota County CDA's First Time Homebuyer Program have remained in line with overall Dakota County demographics, with 12 percent of borrowers representing minority households. The most common barriers preventing housing counseling clients from qualifying for a mortgage product are income restraints and credit issues, and the Dakota County CDA is actively working with clients, in collaboration with industry partners, to provide budget and credit counseling support for clients that need to address these barriers to achieve mortgage-readiness.

The Dakota County CDA provided an online option for participants to use when applying for HCVs and used the online platform when the HCV waiting list opened in July 2018. It used the online application when the Project Based Voucher waiting list opened in April 2018.

St. Paul: The City of Saint Paul financially supported the Minnesota Homeownership Center (Center) which offers individualized financial wellness and home buyer counseling and homebuyer education classes (Home Stretch workshops), which included multicultural and multilingual homebuyer classes. Homeownership workshops were held in English, Hmong, Somali, Karen, and Spanish. The Center also works directly with the African Development Center and African Economic Development Solutions to outreach to Somali and Africans new to America.

Additionally, the City of Saint Paul participated with HOCs Home Ownership Alliance (HOA) initiative, a collaboration of more than 30 organizations committed to equitable homeownership for people of color and lower-income households. The HOA brings together organizations that represent a range of communities, including the Neighborhood Development Alliance, and NeighborWorks Home Partners and Twin Cities Habitat for Humanity. The HOA leverages these partnerships to create paths for underserved communities to achieve equitable, affordable homeownership.

Impediment: Fair housing enforcement and education is needed.
Recommendations:

- Code enforcement personnel should be trained to maintain communication and status updates with complainants as well as property owners.
- Develop and deliver a fair housing education and training program for elected officials and municipal staff focused on geospatial concepts such as disparate impact and the impact of public infrastructure investments on fair housing choice.
- Organizations offering fair housing education should partner with existing community-based organizations to deliver information in culturally-appropriate ways to non-English speaking communities; education materials should include general information about landlord and tenant responsibilities as well. A "what to do if you're facing eviction" insert could be helpful.

Hennepin County: The County has taken an active role in engaging the community of North Minneapolis and all of the cities along the blue line corridor before breaking ground with the blue line light rail. The plan now will have minimal impact or harm in displacing households. Further the County has funded studies from the Center of Urban and Regional Affairs and the Carlson School of Management in the University of Minnesota to identify gentrification trends and how to limit displacement. The County also funds with CDBG tenant advocacy in multiple languages through HOME Line.

Minneapolis: Minneapolis: The City has adopted a "Renter First" policy that centers renters in rental licensing enforcement action, including hiring new tenant navigators to help renters resolve problems with building owners and managers. In addition, the City has increased investment to provide legal services to renters facing eviction and to represent low-income renters in habitability cases.

The City provides financial support to Legal Aid and HOME Line to provide free legal services for low-income renters facing eviction. The City support HOME Line's Tenant Hotline offering free information and legal advice to Minneapolis residents in English, Spanish, Somali and Hmong. In 2018, 3,344 renter households, representing 8,110 Minneapolis renters, contacted HOME Line's Tenant Hotline, resulting in $378,000 in damage deposits and rent abatements recovered or saved and 224 evictions prevented.

In 2019, the City increased support for tenant services, providing funding to Mid-Minnesota Legal Aid and Volunteer Lawyers Network to expand legal representation for renters facing eviction. An estimated 320 more renter households will be represented at housing court because of this support.

- Review LEP plans and update as needed to better serve the needs of people of oral-based cultures.
- Designate an ombudsman to specific immigrant communities to be responsible for communication regarding available housing programs and needs.
- Explore partnerships to disseminate fair housing information and resources to undocumented residents through existing organizations.
- Conduct region-wide fair housing testing specifically in the areas of steering and discrimination on the basis of familial status.
- Commit staff resources to efforts to enhance engagement with communities of color regarding available housing programs and needs. Entitlement jurisdictions should be intentional regarding their community outreach to open and maintain lines of communication within communities of color. Consideration should be given to the designation of a specific staff member to facilitate these intentional engagement efforts.

Woodbury: The City has redefined the position of Community Development Coordinator to include liaison responsibilities to intentionally build relationships with the local nonprofit and faith communities.

Minnetonka: Between 2015 and 2017, Minnetonka spent $3,171 of their allocated CDBG funds on a variety of fair housing activities.

Washington County: The County co-produced ECHO Fair Housing Videos: In collaboration with cities and counties in the Twin Cities Metro, production "A good, safe place to live". The videos are 5-minute digital shorts in English, Spanish, Somali, Karen & Hmong to help new Minnesota renters understand their rights and responsibilities as tenants. The video provides basic knowledge of the laws that protect them, around discrimination, home safety and potentially predatory landlords. The Council on American-Islamic Relations (CAIR) Minnesota training to CDA staff on Somali and Muslim culture & accommodations.

Dakota County: The ECHO rental fair housing video "A Good, Safe Place to Live" is available on the Dakota County CDA website in five languages that include English, Spanish, Hmong, Somali and Karen. The Dakota County CDA contributed funding to the creation of the videos and continues to market the ECHO rental fair housing video/program. The videos help new Minnesotans understand their rights and responsibilities as tenants, Twin Cities PBS (TPT) program "ECHO" produced a short video in five languages, covering the basics of tenant and landlord rights and obligations. The program "A Good, Safe Place to Live" is available in these languages: Hmong, Karen, Somali, Spanish and basic English. The program was developed in collaboration with more than thirty community and governmental partners, including housing and redevelopment authorities and community development agencies from the seven-county metro area, as well as legal aid organizations, state housing authorities and others. The program premiered statewide on TPT's Minnesota Channel on April 11, 2016, and is also available on DVD, and online at tpt.org/echo. In addition, a curriculum for English Language Learning classrooms is in development, allowing adult learners to discover more about housing issues while mastering English. Furthermore, ECHO plans to pair its cultural outreach coordinators with educators around the state to help communities absorb this important information.

Dakota County Social Services staff provides and distributes tenant and landlord marketing materials with a clear message about available assistance to resolve housing crises and prevent homelessness. The goal is to have this information provided at lease signing or other interactions between landlords and tenants to encourage them to refer tenants to resources instead of resorting to eviction. The tenant information is in English, Spanish and Somali.

The Dakota County CDA Community and Economic Development Department staff held bi-monthly meetings with the city Community Development Directors. This group has discussed the creation and implementation of local Fair Housing Policies in individual cities.

Saint Paul: The City created the Fair Housing Coordinator position coordinate partnerships with community and city departments, including the Departments of Safety and Inspections, Planning and Economic Development and Human Rights to expand fair housing education citywide. The Department of Safety and Inspections provides Fair Housing Training to all new Certificate of Occupancy holders. The Department of Human Rights and Equal Economic Opportunity provides Fair Housing trainings and information to community and serves as a resource for City staff.

FHIC: The FHIC funded a project completed by Southern Minnesota Regional Legal Services housing discrimination attorneys and staff who partnered with seven local organizations serving immigrant communities and conducted nine fair housing trainings with 169 attendees. The trainings focused on renters' rights and responsibilities and fair housing law. The trainings were

also highly visual. Additionally, even though the trainings were directed toward the clients of the agencies, the staff of the agencies also received the same information which allows the staff to better assist their clients.

Impediment: Multifaceted values on neighborhoods and housing.
Recommendations:

- Monitor findings related to the Family Housing Fund's research on pooling vouchers for use in high-opportunity areas as well as its voucher mobility research for MPHA and study applicability for other PHAs.
- Monitor the success of Met Council's mobility program for strategies that can be adapted or duplicated elsewhere.
- Routinely review PHA subsidy standards and LIHTC QAPs to ensure accommodation of units for large, multigenerational families.

Metropolitan Council: The Met Council HRA reviews subsidy standards each year and awards additional points for Project Based Voucher units that provide housing for large bedroom sizes - 3 or more bedrooms.

Minneapolis: The city prioritizes projects with large family units in both the QAP and Affordable Housing Trust Fund programs.

St. Paul: To encourage the development of 3+ bedroom units, extra points will be awarded to tax credit projects that promote family housing where 25% of more of the units in the project have three or more bedrooms.

Impediment: Regulations and policies impact housing development.
Recommendations:

- Adopt zoning code amendments to either (1) have the definition of "family" more closely correlate to neutral maximum occupancy restrictions found in safety and building codes; (2) increase the number of unrelated persons who may reside together to better allow for nontraditional family types; or (3) create an administrative process that allows for a case-by-case approach to determining whether a group that does not meet the code's definition of family or housekeeping unit is nonetheless a functionally equivalent family.
- Amend zoning maps to rezone large-lot single-family zones to higher density/ lower minimum lot area standards and allow for infill development or conversion of large single-family dwellings to two-family and triplex units to allow more density on the same footprint or minimum lot size; consider reducing administrative barriers to PUD and cluster development approvals which support affordable housing.
- Amend zoning codes to reflect more flexible and modern lot design standards such as increasing maximum height allowances, increasing minimum density or floor area ratios, increasing maximum floor area ratios (FAR), decreasing minimum parcel sizes, and decreasing minimum livable floor areas of individual dwelling units.
- Consider development incentives such as density bonuses and expedited permitting processes or fee waivers for voluntary inclusion of affordable units or mandatory set asides in cases where local government funding or approvals are provided, should be adopted across all jurisdictions to encourage or require mixed-income, affordable units.

- Review and update zoning codes as necessary for consistency with the state Planning Act regarding manufactured and modular homes. Review conditional permit use criteria and inclusionary zoning provisions to ensure they support and encourage this type of alternative affordable housing.
- Consider allowing reductions in off-street parking requirements where there is a showing that shared parking, bike parking, or access to public transportation reduces the actual need or demand for off-street vehicle parking; consider adopting maximum off-street parking restrictions.
- Consider adoption of an inclusionary zoning ordinance requiring set-asides of affordable housing units especially for developments requiring city funding, site location assistance, or planning approvals.
- Analyze zoning codes in areas not covered by this study for fair housing issues.
- Ranked list of municipalities in QAP should be re-examined for impact on perpetuating concentrations of affordable housing; consider whether other measures of affordable housing need may be more effective.

Plymouth: Plymouth HRA staff continues to have discussions with senior leadership around the following topics: -Considering development incentives such as density bonuses and expedited permitting processes or fee waivers for voluntary inclusion of affordable units or mandatory set asides. -Adoption of an inclusionary zoning ordinance requiring set-asides of affordable housing units, especially for developments requiring city funding, site location assistance, or planning approvals.

St. Paul: The City amended it zoning code to increase housing density in high-use transportation corridors to increase housing development. The City's amended Zoning Code does not impose conditional use permits for supportive housing which is classified as apartments and has increasingly allowed for rezoning for increased building heights; requirements for parkland dedication as a mechanism to ensure adequate par amenities for all residents are reduced for affordable housing developments; Accessory Dwelling units (ADU are now allowed throughout the city; and the Sustainable Building Regulations Ordinance establishes sustainable building regulations for buildings owned, operated or funded by the City ensuring energy efficiency and sustainability and this lower costs for building owners and tenants. The City Council and Mayor's Office advanced a slate of tenant protection ordinances in March 2020, including: limits on security deposits, tenant screening guidelines, advance notice of sale, just cause notice and rights and rights and responsibilities information. This package is currently awaiting public hearing before moving to a vote.

Washington County: In 2017, Washington County eliminated priority based on location in the Qualified Allocation Plan.

- Update tenant screening policies related to criminal background based on revised HUD guidance issued in 2016.

Minneapolis: Minneapolis adopted a new occupancy ordinance in December of 2019. The previous ordinance restricted family to those who are related by blood or legally (adoption, marriage, domestic partnership). This ordinance also eliminates the maximum occupancy requirements in

each zoning district. The new ordinance removes these restrictions on the definition of family. Also in 2019, Minneapolis eliminated single-family zoning to allow for more density and more construction of affordable housing units. Minneapolis has also decreased off-street parking limits citywide.The Minneapolis City Council adopted a permanent, comprehensive Inclusionary Zoning policy in December 2019 that is now in effect. The policy applies to all new housing development projects in the City with 20 or more units. It will phase in over time for smaller projects (20-49 units) and ownership projects (condos). Developers must include affordable units in their projects or choose a compliance alternative, such as paying an in-lieu fee or producing affordable units off-site. The City is encouraging innovation to increase housing supply and diversity in other ways. In 2019, the City Council approved changes to the zoning code to allow for the development of intentional communities and cluster developments to provide more housing options for residents experiencing housing instability.

The City adopted an ordinance in 2019 that provide increased tenant protections during the screening process. Tenants cannot be denied for misdemeanor convictions older than three years, felony convictions older than seven years, and serious offenses older than ten years, with some exceptions. The ordinance also prohibits the use of a credit score to deny applicants and places a cap on security deposits.

Metropolitan Council: Met Council HRA reviewed and revised selection procedures with a goal of screening families in rather than out.

- Remove or amend residency preferences to better advance regional fair housing choice.

Impediment: Displacement causes a loss of affordable housing.
Recommendations:

- Work toward and advocate local adoption of just cause eviction ordinances.
- Monitor state legislation regarding right of first refusal statutes and develop program to implement locally as appropriate.
- Continue research into gentrification and loss of affordable housing to identify areas where it may be occurring.
- Research available property tax abatement programs and market them to homeowners in areas of increasing displacement.
- Convene dialogue between code enforcement, child welfare agencies, and housing rehabilitation programs to discuss linkages that would provide assistance to tenants living in substandard conditions.

Hennepin County: The County has funded studies from the Center of Urban and Regional Affairs and the Carlson School of Management in the University of Minnesota to identify gentrification trends and how to limit displacement. The County invests in 4D financing, NOAH preservation, and affordable housing development throughout the county. The County works with the Minneapolis Public Housing Authority to continue and grow the Family Unification Program to ensure that families are not separated on the basis of housing and they have access to housing vouchers.

Minneapolis: The City is undertaking a number of anti-displacement strategies, including NOAH preservation, tenant protections and researching new policies that may prevent displacement, such

as a tenant opportunity to purchase ordinance. The City of Minneapolis adopted tenant protection ordinances in 2018 and 2019, including: Advance Notice of Sale and Post-Sale Tenant Protections, and a tenant screening ordinance. The City has invested in NOAH preservation efforts, including a NOAH preservation fund, Small and Medium Multi-Family Loan Program and 4d Affordable Housing Incentive Fund. All of this work is informed by the University of Minnesota Center for Urban and Regional Affairs (CURA) study on gentrification. The City participated in the Anti-Displacement Policy Network cohort, along with St. Paul, through PolicyLink.

Plymouth: Plymouth HRA staff has discussed a variety of displacement-based topics with senior leadership, including just cause eviction ordinances. Staff has also convened dialogues between code enforcement staff, child welfare agencies, and housing rehabilitation programs to discuss potential linkages.

Scott County: The CDA partnered with the U of M to create a uniform inspection checklist to be provided to both landlords and tenants ahead of the County inspections.

St. Paul: The Office of Financial Empowerment focused on addressing the need for tenant protections in 2019 through community engagement and are looking to move a slate of tenant protections ordinances forward in early 2020 including: Specifically, Advance Notice of Sale and Just Cause Notice

The City launched a rent supplement program in partnership with 7 Saint Paul Public Schools to provide a monthly rent subsidy to families with young children at risk of displacement called Families first. The Families First Housing Pilot provides Saint Paul families a $300.00 monthly rent subsidy and ongoing supportive services for up to three years.

Saint Paul implemented 4d tax incentive to preserve affordable housing units. The 4(d) Affordable Housing Incentive Program offers rental property owners a tax rate reduction and limited grant assistance for units that remain affordable for ten years. The 2020 guidelines expand coverage to single family home rentals.

City staff and elected officials participated in the Anti Displacement Policy Network Cohort through PolicyLink. Minneapolis and St. Paul jointly formed a team to participate in this network to learn about policies other cities around the country are pursuing to combat displacement and to advance anti-displacement policies here in the Twin Cities.

FHIC: The Housing Justice Center (HJC) was awarded funds from the FHIC in program year 2017. HJC researched and identified strategies to minimize and mitigate resident displacement from affordable housing. A final report, Local Strategies for Housing Choice and Stability, has been completed and has been distributed and discussed around the area during program year 2018.

Impediment: Distribution of affordable housing.
Recommendations:

- Increase funding for affordable housing; work with marketing firm to develop a campaign that raises awareness among the public about housing affordability and connects the issue

to education, jobs, and other infrastructure. Campaign should build political will, counter NIMBYism, and include an appeal to philanthropies for funding.
- Support NOAH Fund, publish success stories, market to susceptible property owners, increase capitalization and funding sources.
- Develop and implement an ongoing campaign to encourage more landlords to accept HCVs, especially in suburban communities.

Metropolitan Council: The Met Council hired an outreach coordinator whose primary focus is landlord engagement and recruitment, fostering landlord/tenant relationships, and assisting with housing searches. In conjunction with the MN Multi-Housing Association, the two groups have built connections with local landlords and hold regular briefings and workshops to educate landlords about the Section 8 program.

- Require comprehensive plans to describe how they plan to meet affordable housing need, not just guide the land for it.
- Maintain local LIHTC database as a tool for studying trends over time in the development of tax credit projects.
- Analyze the MN Challenge recommendations related to reducing the cost of affordable housing for feasibility at the local level; implement as appropriate.
- In areas where 4% credits have become competitive, attach additional criteria to review processes to better direct projects toward strategic ends (i.e. preservation focus or location of new units in areas of opportunity).
- Prioritize rehabilitation and preservation of existing affordable housing in areas where displacement is known to be occurring.

Plymouth: Since 2015, Plymouth has provided 35 home rehabilitation loans and 11 emergency repair grants to income-eligible households that have helped residents remain in their home. City staff has also continued to engage in outreach efforts with landlords to expand acceptance of HCVs, especially for those multifamily housing properties using public funds. Finally, staff monitors for compliance on at least an annual basis.

Washington County: Through its owner-occupied rehabilitation loan program Washington County has issued 73 loans to homeowners at or below 80% area median income since 2012. Washington County is also a loan administrator for MN Housing's rehabilitation and emergency loan programs.

Woodbury: The Woodbury HRA combined two existing loan programs in to the new Neighborhood Reinvestment Fund, which provides for greater access to capital for rehabilitation of owner-occupied housing stock in the community with income maximums indexed to 125% of the Woodbury median household income.

Dakota County: Since 2015, Dakota County has provided home rehabilitation loans to 296 households. The Dakota County CDA holds monthly landlord/owner workshops about the HCV Program for rental property owners and landlords that provide tools, tips and information on requirements and policies. Fair housing information is also included. All Dakota County CDA activities that may affect an owner’s ability to lease a unit will be processed as rapidly as possible, in order to minimize vacancy losses for owners. The CDA holds an annual owners’ conference to discuss any program changes and new topics as well as provide an opportunity for owners to ask

questions, obtain written materials and meet program staff. The CDA provides owners with a handbook that explains the program, including HUD and CDA policies and procedures, in easy-to-understand language. The CDA gives special attention to helping new owners succeed through activities such as:

- The CDA requires first-time owners (or their agents) to participate in a briefing session on HAP contract requirements.
- Provides the owner with a designated CDA contact person.
- Provides other written information about how the program operates, including answers to frequently asked questions.
- Provides program information as well as frequently used forms on the CDA Website.

The Dakota County CDA Housing Finance Policy includes the requirement for housing projects financed with private activity bonds, 501(c)(3) bonds, refunding bonds, Low Income Housing Tax Credits, Tax Increment Financing and HOPE funds (a local gap financing source) to participate in the Section 8 Program (aka HCV). The developer is required to sign an agreement that while the bonds/loan/agreement are outstanding, they will not exclude from consideration qualified families receiving assistance from the Section 8 program.

Hennepin County: The County invested the first $3 million in the regional NOAH fund, and invested $2 million in the second phase of this fund. The County also created a Supportive Housing Strategy, which awarded $6 million in its first year to fund 212 units of supportive housing affordable to households with extremely low incomes. The County increased its local Affordable Housing Incentive Fund to $5.5 million in 2020, and pairs this fund with HOME and CDBG to focus funds at housing affordable to households with the lowest incomes. Overall, the county creates or preserves almost 1,000 units of affordable housing. Since 2015, Hennepin County has provided over 90 home rehabilitation loans to low or moderate- income households.

Minneapolis: The City has long invested in the production and preservation of affordable rental housing with subsidies that have income and long-term affordability requirements. Increased City investment in affordable rental housing is setting records for new production and expanding our ability to serve the lowest income City residents. The Affordable Housing Trust Fund is one of the City's primary tools to preserve and produce new affordable rental housing. The AHTF provides financing to help close the gap between the cost of decent, safe housing and the amount of rent that low-income residents can afford. In 2019, the City invested an historic $20 million in the Affordable Housing Trust Fund, which will preserve and produce more than 1,000 units of rental housing.

The City has created three programs to address NOAH preservation. The programs include tools for preservation buyers to purchase NOAH properties and incentives for existing owners to maintain affordable rents.

- NOAH Preservation Fund: Launched in 2017, this program helps nonprofit housing providers acquire larger NOAH properties or portfolios of typically 75 or more units to preserve affordability, address housing quality improvement needs, and prevent displacement.
- Small and Medium Multifamily Loan Program (SMMF): A partnership between the City, the Land Bank Twin Cities, Inc. and Twin Cities Local Initiatives Support Corporation

(LISC), this program acquires small to medium-size multifamily buildings with 2–49 units in need of housing quality improvements. The Land Bank acquires properties with funding from both the City and LISC, makes housing quality improvements, stabilizes the property operations and develops a long-term disposition strategy. Program guidelines prioritize disposition to support community-based ownership, including sales to community-based nonprofit organizations, housing providers with historic ties to the neighborhood and/or tenant cooperatives. The SMMF was launched in mid-2018 and its guidelines were revised in May 2019.

- 4d Affordable Housing Incentive Program: The City created this program to offer a lower property tax rate to owners of NOAH properties if they agree to maintain affordable rents for 10 years and to reserve all vacancies throughout the 10-year period for low- and moderate-income households. Owners of unsubsidized multifamily properties with two or more units are eligible to apply, as long as at least 20% of the property's rental units are affordable to households making 60% of the area median income(AMI). Participating property owners agree to limit annual rent increases affecting tenants to 6% or lower per year. In addition to reduced property taxes, participating property owners are eligible for free or low-cost energy assessments and City cost sharing for solar energy installations and energy efficiency improvements.

Eden Prairie: From 2015-2017, the City provided 28 home rehabilitation loans.

Minnetonka: The City provided 47 home rehabilitation loans from 2015-2017.

Saint Paul: The City Council passed resolution 18-1204, calling for action to create and preserve housing that is affordable at all income levels; address racial, social and economic disparities in housing; create infrastructure needed to stabilize housing; fund an Affordable Housing Trust Fund; and continue to fund down payment assistance for first-time homebuyers. This resolution is a public acknowledgement that housing, especially affordable housing, is a priority for the city. The 2040 Comprehensive Plan also supports affordable housing development. Policy H-32 states "Continue to use City/HRA resources to support affordable rental housing citywide with at least 30 percent of the total rental units (both market-rate and affordable) financially assisted by the City/HRA being affordable to households earning 60 percent or less of AMI with at least: 10% of all units being affordable to households earning 30% of AMI; 10% of all units being affordable to households earning 50% of AMI; and 10% of all units being affordable to households earning 60% of AMI.

The City also implemented 4d tax incentive to preserve affordable housing units. The 4(d) Affordable Housing Incentive Program offers rental property owners a tax rate reduction and limited grant assistance for units that remain affordable for ten years. The 2020 guidelines expand coverage to single-family home rentals.

Impediment: Segregation & disparate access to opportunity.
Recommendations:

- Met Council should develop the capacity to resource local government staff for fair housing planning.

- Integrate Met Council's housing performance scores into county CDBG subrecipient funding processes; study feasibility of integrating scores into prioritization of park and library funding

Impediment: Concentrated poverty requires place-based investment.
Recommendations:

- Explore options for amplifying community voices in local planning decisions. Plan to include non-English speakers, and those of oral traditions.
- Consolidated Plans should be place-based, focusing available funding on improving opportunity in high-poverty areas.
- Review capital improvement planning models to ensure process is guided by data on concentrated poverty and areas of low opportunity.
- Maintain data on the racial and ethnic composition of local elected and appointed boards and commissions.

Hennepin County: During the Five-Year Consolidated Planning period for 2020 to 2025 Hennepin County utilized technology to engage communities through an internet-based survey that was accessible in multiple languages. There have been several community meetings that took place in several cities in the county. The planning process has been the most involved process Hennepin County has ever taken in gathering community input. Hennepin County has also prioritized the survey respondents who were people of color or indigenous and those of low to moderate income. The County isolated those responses and weighted them heavily compared to the general population. Also, now the County has the most diverse County Board in its 150 + year history.

Minneapolis: As part of the Minneapolis2040 Consolidated Planning process, the City has developed extensive community engagement strategies to ensure that a variety of voices are heard. The steps taken included providing childcare, ADA accessibility, offering a variety of times, methods and locations of engagement, and offering translation of materials and presentations in a variety of languages. The City of Minneapolis created a new Advisory Committee on Housing to advise the Mayor, Council and City departments on matters related to housing policy. In addition, the City Council adopted a Strategic and Racial Equity Action Plan that identifies a goal of Improving the capacity of appointed boards and commissions (ABCs) to advance the City's racial equity work.

FHIC: For program year 2018 the FHIC awarded Equity In Place (EIP) funds to incorporate and support the recommendations from the AI Addendum. EIP performed work in the suburban jurisdictions to engage underrepresented racial, ethnic, and other protected class communities around the following activities to incorporate and support the recommendations from the AI Addendum (Goal 7):

- Educated individuals on their fair housing rights;
- Explained how government processes impact them and how to be a part of these decision-making processes to further fair housing;
- Worked with underrepresented protected classes to identify strategies to address the fair housing challenges they face;
- Connected community members with decision-makers to further fair housing in the jurisdiction; and

- Worked with fellow grantees around shared fair housing issues.

Discuss how you have been successful in achieving past goals, and/or how you have fallen short of achieving those goals (including potentially harmful unintended consequences).

Hennepin County: Hennepin County has made strategic investments to impact equitable affordable housing development, investing in 1000 units of affordable housing annually. Greatest investments are made in housing affordable to people below 30% of the area median income, as that is where the greatest housing cost burden, overcrowding, and racial disparities occur.
For households with incomes below 30% of the area median income, the County:

- Increased the portion of County-financed housing units affordable to households with extremely low incomes from 18%-25%.
- Created a Supportive Housing Strategy, which awarded $6 million in its first year to fund 212 units of supportive housing to those with extremely low incomes.
- Prioritized households with extremely low incomes for emergency housing assistance funded through CDBG.

For households with incomes below 50% of the area median income, the County:

- Increased its local Affordable Housing Incentive Fund to $5.5 million in 2020
- Invests heavily in the land trust model of homeownership, including a new pilot program focused on Black homebuyers.

For households with incomes below 80% of the area median income, the County:

- Invested $2 million in the second phase of the NOAH Impact Fund
- Provides financial assistance to repair about 160 owned homes each year
- Funds homebuyer down payment assistance, including a pilot program aimed at impacting racial disparities in homeownership.

Minneapolis: The City of Minneapolis has undertaken significant activity around affordable and fair housing goals. The City has adopted or is working on ordinances identified in the previous set of recommendations, including but not limited to: a local source of income protection (currently enjoined pending litigation), changing the definition of "family" in the zoning code, changed the code to allow Accessory Dwelling Units and adopting a permanent inclusionary zoning policy. The City has significantly increased funding for affordable housing development, including preservation of naturally occurring affordable housing and new production for households earning less than 50% of Area Median Income. The City prioritizes projects with large family units in both its QAP and Affordable Housing Trust Fund program. The City has adopted a "Renter First" policy that centers renters in rental licensing enforcement action, including hiring new tenant navigators to help renters resolve problems with building owners and managers. In addition, the City has increased investment to provide legal services to renters facing eviction and to represent low-income renters in habitability cases. The City has used its Consolidated Plan resources to implement place-based strategies with Promise Zone and Opportunity Zone marketing and investments, employment and business programming focused on geographies requiring intervention, and local policies tying localized infrastructure improvements with community and economic development goals. The City has taken steps to reduce the cost of developing affordable housing, including zoning text code amendment to allow triplexes, parking reductions, and the ADU ordinance. The City is undertaking other anti-displacement strategies, including NOAH

preservation, tenant protections and researching new policies that may prevent displacement, such as a tenant opportunity to purchase ordinance.

Saint Paul: The City remains committed to advancing fair housing with an emphasis on racial equity and economic justice through collaborations with the community, city departments, and elected officials. In 2018, the City created and funded its Housing Trust Fund, with a total investment of $16,000,000.00. The objectives for St. Paul's housing trust fund strategy are as follows:

- Meet the needs of those with the lowest incomes by increasing supply. The lowest income residents in St. Paul are the most cost-burdened and have the fewest existing housing options.
- Invest in low and moderate-income residents by investing in the existing supply. Maintaining the housing options that are already serving low and moderate-income families will ensure the City does not lose ground on increasing the supply, and will prevent displacement.
- Explore innovative approaches to meeting housing needs. Piloting programs and options to produce affordable opportunities more efficiently will allow more residents to be served.
- Build wealth for residents and communities. Targeting housing investments in ways that increase affordability and the resources available to low-income residents and communities.
- Promote fair access to housing for all of us. Expanding tenant protections, landlord training, and coordination among City departments to ensure fair access to housing and displacement prevention.

In 2019, the City formed a new Office of Financial Empowerment (OFE), including a full-time Fair Housing Coordinator position who works with several city departments and residents as well as with the regional Fair Housing Implementation Committee to establish policies, regulations, and programs to proactively ensure that Saint Paul residents do not experience housing discrimination and to affirmatively further fair housing. The Office of Financial Empowerment developed a framework for the Fair Housing strategy with overarching goals of decreasing housing displacement, increasing housing access and focusing on Affirmatively Furthering Fair Housing. To achieve these goals, the citywide fair housing strategy will align community and department work in four core areas: Preservation and Production, Education and Engagement, Enforcement and Compliance and Tenant Protections. In 2019, OFE focused on Tenant Protections, hosting a series of community engagement events to identify strategies and policy priorities. In 2020, the City will introduce S.A.F.E. Housing St. Paul, a suite of tenant protections policies geared at ensuring stable, accessible, fair and equitable housing opportunities for all.

Additionally, the City is working toward decreasing displacement, increasing access and affirmatively furthering fair housing through several strategies, including:

- Increased Tenant Protections
- 4D Tax Incentive
- Down Payment Assistance
- Rent Supplement Pilot (Families First)

- Inclusionary Zoning Study
- Definition of "family" Study
- Community Land trust Pilot
- Returning Home Saint Paul Pilot (Access fund and services for persons with criminal history)
- Neighbors Helping Neighbors (a VISTA led volunteer initiative to aid low income residents with minor water leaks and nuisance abatement that can cause housing instability through fees and excess costs)

Washington County: Washington County and Washington County CDA have worked together to achieve fair housing goals and continue to collaborate on projects that affirmatively further fair housing and expand the available, accessible and affordable housing supply. Strides have been made to address the impediments found in the 2014 Analysis of Impediments and the Addendum recommendations. Washington County and the CDA will continue to collaborate with developers, landlords, elected officials, educators, businesses and citizens in the effort to incorporate AFFH practices.

Dakota County: The Dakota County CDA has worked hard to make the Housing Choice Voucher program more accessible to those in need of housing assistance as well improving landlord/property owner outreach and education. The Dakota County CDA also strives to reach deeper into minority and Hispanic households with their homebuyer programs than the overall County demographics, but presently the Dakota County CDA is looking to ensure their homebuyer programs are at least as representative as the County as a whole.

b. Discuss any additional policies, actions, or steps that you could take to achieve past goals, or mitigate the problems you have experienced.

Hennepin County: The County continues to focus new, deeper investments in housing affordable to households with the lowest incomes. Additionally, the County plans to take action investing in informing tenants and renters of their rights and responsibilities and promoting inclusive tenant selectin plans. Looking to the next five years, it will be important for the County to identify goals that are achievable and can be measured. In this way, the County can fully identify steps to address these issues in a practical and strategic manner.

c. Discuss how the experience of program participant(s) with past goals has influenced the selection of current goals.

Several of the jurisdictions have made extensive changes to local policies that address the impediments identified in the 2014 Analysis of Impediments to Fair Housing Choice. The goals included in this current Analysis of Impediments were selected based on areas that were not fully executed form the 2014 AI, areas that were not explicitly covered in the 2014 AI, and areas where significant improvement can still be made by jurisdictions in addressing local impediments.

V. Fair Housing Analysis

A. **Demographic Summary**

This Demographic Summary provides an overview of data concerning race and ethnicity, sex, familial status, disability status, limited English proficiency, national origin, and age. This data reflects the composition of the Minneapolis-St. Paul-Bloomington, MN-WI Metro Area and the counties and entitlement jurisdictions within it.

1. *Describe demographic patterns in the jurisdiction and region, and describe trends over time (since 1990).*

The Twin Cities Region is located in southeastern Minnesota. The Region has an overwhelmingly white population, with small but growing minority group and immigrant group populations.

Table 1.1: Demographics, Anoka County

	Anoka County			Minneapolis-St. Paul-Bloomington, MN-WI Metro Area		
Race/Ethnicity	**#**		**%**	**#**		**%**
White, Non-Hispanic		285,056	82.66%		2,697,773	76.51%
Black, Non-Hispanic		18,860	5.47%		278,802	7.91%
Hispanic		14,597	4.23%		201,417	5.71%
Asian/Pacific Is., Non-Hispanic		33,457	9.70%		225248	6.39%
Native American, Non-Hisp.		1,852	0.54%		16,974	0.48%
Two+ Races, Non-Hispanic		9,327	2.70%		99,725	2.83%
Other, Non-Hispanic		426	0.12%		6,210	0.18%
#1 country of origin	Mexico	3,155	11.51%	Mexico	48,649	13.28%
#2 country of origin	India	1,530	5.58%	India	26,441	7.22%
#3 country of origin	Ethiopia	1,470	5.36%	Somalia	23,554	6.43%
#4 country of origin	Liberia	1,409	5.14%	Laos	23,080	6.30%
#5 country of origin	Vietnam	1,330	4.85%	Ethiopia	17,546	4.79%
#6 country of origin	Somalia	1,250	4.56%	Vietnam	16,411	4.48%
#7 country of origin	Laos	1,237	4.51%	Thailand	16,235	4.43%
#8 country of origin	Bosnia and Herzegovina	1,057	3.86%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	Korea	852	3.11%	Liberia	11,449	3.13%
#10 country of origin	China, excluding Hong Kong and Taiwan	796	2.90%	Korea	11,236	3.07%
#1 LEP Language	Spanish or Spanish Creole	3,927	1.24%	Spanish or Spanish Creole	63,539	1.97%

#2 LEP Language	African languages	1,579	0.50%	African Languages	27,394	0.85%
#3 LEP Language	Hmong	1,158	0.37%	Hmong	24,721	0.77%
#4 LEP Language	Vietnamese	1,146	0.36%	Vietnamese	12,074	0.37%
#5 LEP Language	Russian	778	0.25%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Arabic	675	0.21%	Chinese	8,973	0.28%
#7 LEP Language	Chinese	499	0.16%	Russian	6,435	0.20%
#8 LEP Language	Serbo-Croatian	464	0.15%	Laotian	3,849	0.12%
#9 LEP Language	Other Slavic languages	335	0.11%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	French (incl. Patois, Cajun)	281	0.09%	Arabic	2,820	0.09%
Hearing difficulty		11,250	3.3%		105,329	3.0%
Vision difficulty		5,083	1.5%		49,528	1.4%
Cognitive difficulty		13,454	4.2%		138,788	4.2%
Ambulatory difficulty		13,471	4.2%		148,966	4.6%
Self-care difficulty		5,850	1.8%		65,395	2.0%
Independent living difficulty		10,674	4.1%		116,400	4.4%
Male		172,482	50.01%		1,745,774	49.51%
Female		172,379	49.99%		1,780,375	50.49%
Under 18		83,721	24.28%		846,375	24.0%
18-64		218,023	63.22%		2,231,257	63.3%
65+		43,117	12.50%		448,517	12.7%
Families with children		40,383	32.03%		409.814	30.23%

Source: American Community Survey Estimates, 2013-2017

Table 1.2: Demographic Trends, Anoka County

	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	**#**	**%**	**#**	**%**	**#**	**%**
White, Non-Hispanic	235464	96.56	276736	92.77	282,083	85.22%
Black, Non-Hispanic	1228	0.5	6110	2.05	17,529	5.30%
Hispanic	2232	0.92	4943	1.66	12,025	3.63%
Asian or Pacific Islander, Non-Hispanic	2843	1.17	6197	2.08	15,013	4.54%
Native American, Non-Hispanic	1759	0.72	3391	1.14	3,879	1.17%

National Origin						
Foreign-born	4095	1.68	10786	3.62	22,739	6.87%
LEP						
Limited English Proficiency	2577	1.06	6089	2.04	11,556	3.49%
Sex						
Male	122032	50.05	149551	50.14	165,414	49.97%
Female	121778	49.95	148721	49.86	165,608	50.03%
Age						
Under 18	74576	30.59	88465	29.66	86,069	26.00%
18-64	155713	63.87	188863	63.32	212,693	64.25%
65+	13521	5.55	20944	7.02	32,260	9.75%
Family Type						
Families with children	37449	57.25	32159	53.07	41,461	47.18%

Source: Decennial Census, 1990, 2000, 2010

Race

In Anoka County, the majority of residents are white, Non-Hispanic (96.56%), followed by Asian Americans or Pacific Islanders, Non-Hispanic (1.17%), Hispanic or Latino (0.92%), Native Americans, Non-Hispanic (0.72%), and lastly Black, Non-Hispanic (0.5%). Between 1990 and 2010 there was a trending decrease in the population of white, Non-Hispanic citizens in the county. In 1990 the white, Non-Hispanic citizen percentage was 96.56%, however by 2010 that percentage declined to 85.22%. As this percentage decreased the percentage of citizens of color in the county gradually increased. From 1990 to 2010, the non-white population increased from 0.5% to 5.30% for Black, Non-Hispanics, 0.92% to 3.63% for Hispanics, 1.17% to 4.54% for Asian or Pacific Islander, Non-Hispanics, and 0.72% to 1.17% for Native American, Non-Hispanics.

National Origin

The ten most common national origins in the state are, from most populous to least populous, Mexico, India, Ethiopia, Liberia, Guatemala, the Philippines, Haiti, Jamaica, Germany, Korea, and Pakistan. There has been a steady increase of foreign-born citizens in Anoka County, as percentages increased from 1.86% in 1990 to 6.87% in 2010.

LEP

The ten most commonly spoken first languages of individuals with Limited English Proficiency (LEP) in Anoka County are, from most populous to least populous, Spanish, African Languages, Hmong, Vietnamese, Russian, Arabic, Chinese, Serbo-Croatian, Other Slavic Language, and French (including Patois, Cajun).There has been a steady increase of citizens with Limited English Proficiency in Anoka County, as percentages increased from 1990 (1.06%) to (6.87%) in 2010.

Disability

Cognitive difficulties (4.2%) and ambulatory difficulties (4.2%) have the highest rates of incidence in this county. After ambulatory and cognitive difficulties, independent living difficulty (4.1%) was the most common, followed by hearing (3.3%), self-care (1.8%), and vision difficulties (1.5%)

Sex
In Anoka County, 50.01% of residents are male while 49.95% are female. In 2010, male residents became a slight minority as the male population dipped to 49.97%.

Age
In Anoka County working age adults are the clear majority (63.22%), followed by minors under 18 (14.50%) and seniors.

Families with Children
In Anoka County, there are 40,383 families with children, making up more than a quarter percent of the population (32.03). However, there has been a decline over time. The percentage of families with children in 1990 (57.25%), 2000 (53.07%), and 2010 (47.18%) show a continued decline in families with children in this county.

Table 2.1: Demographics, Coon Rapids

	Coon Rapids			Minneapolis-St. Paul-Bloomington, MN-WI Metro Area		
Race/Ethnicity	**#**		**%**	**#**		**%**
White, Non-Hispanic	51,722		82.96%	2,697,773		76.51%
Black, Non-Hispanic	3,698		5.93%	278,802		7.91%
Hispanic	2,422		3.89%	201,417		5.71%
Asian/Pacific Is., Non-Hispanic	6,120		9.82%	225248		6.39%
Native American, Non-Hisp.	159		0.26%	16,974		0.48%
Two+ Races, Non-Hispanic	1,773		2.84%	99,725		2.83%
Other, Non-Hispanic	49		0.08%	6,210		0.18%
#1 country of origin	Liberia	605	10.83%	Mexico	48,649	13.28%
#2 country of origin	Mexico	526	9.42%	India	26,441	7.22%
#3 country of origin	China, excluding Hong Kong and Taiwan	308	5.51%	Somalia	23,554	6.43%
#4 country of origin	Moldova	301	5.39%	Laos	23,080	6.30%
#5 country of origin	Laos	272	4.87%	Ethiopia	17,546	4.79%
#6 country of origin	Bosnia and Herzegovina	259	4.64%	Vietnam	16,411	4.48%
#7 country of origin	Vietnam	236	4.23%	Thailand	16,235	4.43%
#8 country of origin	Iraq	220	3.94%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	Ethiopia	202	3.62%	Liberia	11,449	3.13%
#10 country of origin	Canada	194	3.47%	Korea	11,236	3.07%
#1 LEP Language	Spanish or Spanish Creole	502	0.87%	Spanish or Spanish Creole	63,539	1.97%
#2 LEP Language	Chinese	272	0.47%	African Languages	27,394	0.85%

#3 LEP Language	Arabic	257	0.44%	Hmong	24,721	0.77%
#4 LEP Language	Hmong	220	0.38%	Vietnamese	12,074	0.37%
#5 LEP Language	Russian	194	0.34%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Serbo-Croatian	178	0.31%	Chinese	8,973	0.28%
#7 LEP Language	Vietnamese	111	0.19%	Russian	6,435	0.20%
#8 LEP Language	African languages	78	0.13%	Laotian	3,849	0.12%
#9 LEP Language	Other Indo-European languages	66	0.11%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	Other Slavic languages	61	0.11%	Arabic	2,820	0.09%
Hearing difficulty		2,346	3.8%		105,329	3.0%
Vision difficulty		963	1.6%		49,528	1.4%
Cognitive difficulty		2,864	4.9%		138,788	4.2%
Ambulatory difficulty		2,821	4.9%		148,966	4.6%
Self-care difficulty		1,101	1.9%		65,395	2.0%
Independent living difficulty		2,184	4.5%		116,400	4.4%
Male		30,202	48.45%		1,745,774	49.51%
Female		32,140	51.55%		1,780,375	50.49%
Under 18		13,794	22.13%		846,375	24.0%
18-64		39,354	63.13%		2,231,257	63.3%
65+		9,194	14.75%		448,517	12.7%
Families with children		6,729	28.30%		409.814	30.23%

Source: American Community Survey Estimates, 2013-2017

Race

In Coon Rapids, the majority of residents are white, Non-Hispanic (82.96%), followed by Asian Americans or Pacific Islanders, Non-Hispanic (9.82%), Black, Non-Hispanic (5.93%), Hispanic or Latino (3.89%), Two+ Races, Non-Hispanic (2.84%), Native Americans, Non-Hispanic (0.26%), and lastly Other, Non-Hispanic (0.08%).

National Origin

The ten most common national origins in Coon Rapids are, from most populous to least populous, Liberia, Mexico, China (excluding Hong Kong and Taiwan), Moldova, Laos, Bosnia and Herzegovina, Vietnam, Iraq, Ethiopia, and Canada.

LEP

The ten most commonly spoken first languages of individuals with Limited English Proficiency (LEP) in Coon Rapids are, from most populous to least populous, Spanish or Spanish Creole, Chinese, Arabic, Hmong, Russian, Serbo-Croatian, Vietnamese, African Languages, Other Indo-European Languages, and Other Slavic Language.

Disability
Cognitive difficulties (4.9%) and ambulatory difficulties (4.9%) have the highest rates of incidence in Coon Rapids. After ambulatory and cognitive difficulties, independent living difficulty (4.5%) was the most common, followed by hearing (3.8%), self-care (1.9%), and vision difficulties (1.6%).

Sex
In Coon Rapids, 48.45% of residents are male, while 51.55% are female.

Age
In Coon Rapids, working age adults are the clear majority (63.13%), followed by minors under 18 (22.13%) and seniors (14.75%).

Families with Children
In Coon Rapids, there are 6,729 families with children, making up more than a quarter percent of the population (28.03).

Table 3.1: Demographics, Dakota County

	Dakota County			Minneapolis-St. Paul-Bloomington, MN-WI Metro Area		
Race/Ethnicity	**#**		**%**	**#**		**%**
White, Non-Hispanic	330,377		79.68%	2,697,773		76.51%
Black, Non-Hispanic	23,183		5.59%	278,802		7.91%
Hispanic	28,020		6.76%	201,417		5.71%
Asian/Pacific Is., Non-Hispanic	51,203		12.35%	225248		6.39%
Native American, Non-Hisp.	858		0.21%	16,974		0.48%
Two+ Races, Non-Hispanic	11,533		2.78%	99,725		2.83%
Other, Non-Hispanic	972		0.23%	6,210		0.18%
#1 country of origin	Mexico	6,635	17.12%	Mexico	48,649	13.28%
#2 country of origin	Vietnam	2,859	7.38%	India	26,441	7.22%
#3 country of origin	India	2,461	6.35%	Somalia	23,554	6.43%
#4 country of origin	Ethiopia	1,960	5.06%	Laos	23,080	6.30%
#5 country of origin	Somalia	1,749	4.51%	Ethiopia	17,546	4.79%
#6 country of origin	Philippines	1,402	3.62%	Vietnam	16,411	4.48%
#7 country of origin	China, excluding Hong Kong and Taiwan	1,164	3.00%	Thailand	16,235	4.43%
#8 country of origin	Canada	1,127	2.91%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	Korea	1,096	2.83%	Liberia	11,449	3.13%
#10 country of origin	Laos	1,085	2.80%	Korea	11,236	3.07%

#1 LEP Language	Spanish or Spanish Creole	8,080	2.12%	Spanish or Spanish Creole	63,539	1.97%
#2 LEP Language	African languages	2,020	0.53%	African Languages	27,394	0.85%
#3 LEP Language	Vietnamese	1,680	0.44%	Hmong	24,721	0.77%
#4 LEP Language	Russian	1,058	0.28%	Vietnamese	12,074	0.37%
#5 LEP Language	Chinese	1,057	0.28%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Mon-Khmer, Cambodian	408	0.11%	Chinese	8,973	0.28%
#7 LEP Language	Laotian	366	0.10%	Russian	6,435	0.20%
#8 LEP Language	Hmong	357	0.09%	Laotian	3,849	0.12%
#9 LEP Language	Tagalog	270	0.07%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	French (incl. Patois, Cajun)	265	0.07%	Arabic	2,820	0.09%
Hearing difficulty		11,500	2.8%		105,329	3.0%
Vision difficulty		4,686	1.1%		49,528	1.4%
Cognitive difficulty		13,749	3.6%		138,788	4.2%
Ambulatory difficulty		15,633	4.1%		148,966	4.6%
Self-care difficulty		6,437	1.7%		65,395	2.0%
Independent living difficulty		11,718	3.8%		116,400	4.4%
Male		204,016	49.20%		1,745,774	49.51%
Female		210,639	50.80%		1,780,375	50.49%
Under 18		102,978	24.83%		846,375	24.0%
18-64		259,443	62.57%		2,231,257	63.3%
65+		52,234	12.60%		448,517	12.7%
Families with children		52,284	32.93%		409.814	30.23%

Source: American Community Survey Estimates, 2013-2017

Table 3.2: Demographic Trends, Dakota County

	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	**#**	**%**	**#**	**%**	**#**	**%**
White, Non-Hispanic	276148	95.31	335027	89.96	343,736	82.39%
Black, Non-Hispanic	3405	1.18	10225	2.75	23,012	5.52%
Hispanic	4164	1.44	11336	3.04	25,632	6.14%
Asian or Pacific Islander, Non-Hispanic	4752	1.64	12462	3.35	21,192	5.08%
Native American, Non-Hispanic	831	0.29	2242	0.6	2,857	0.68%
National Origin						
Foreign-born	6633	2.29	18999	5.1	32,112	7.70%

LEP						
Limited English Proficiency	3723	1.29	10433	2.8	15,522	3.72%
Sex						
Male	143224	49.44	183991	49.41	204,599	49.04%
Female	146465	50.56	188415	50.59	212,617	50.96%
Age						
Under 18	85389	29.48	109847	29.5	108,838	26.09%
18-64	185553	64.05	234514	62.97	266,410	63.85%
65+	18747	6.47	28046	7.53	41,968	10.06%
Family Type						
Families with children	44209	57.47	42313	56.95	54,542	49.79%

Source: Decennial Census, 1990, 2000, 2010

Race

In Dakota County, the majority of residents were white, Non-Hispanic (79.68%), followed by Asian Americans or Pacific Islanders, Non-Hispanic (12.35%), Hispanic or Latino (6.76%), Black, Non-Hispanic (5.59%), Two+ Races, Non-Hispanic (2.78%), Other, Non-Hispanic (0.23%) and lastly, Native Americans, Non-Hispanic (0.21%). Between 1990 and 2010, there was a decline in the population of white, Non-Hispanic citizens in the county. In 1990, the white, Non-Hispanic citizen percentage was 95.31%, however by 2010 that percentage declined to 82.39%. As this percentage decreased, the percentage of citizens of color in the county gradually increased between 1990 and 2010, from 1.18% to 5.52% for Black, Non-Hispanics, 1.44% to 6.14% for Hispanics, 1.64% to 5.08% for Asian or Pacific Islander, Non-Hispanics, and 0.29% to 0.68% for Native American, Non-Hispanics.

National Origin

The ten most common national origins in Dakota County are, from most populous to least populous, Mexico, Vietnam, India, Ethiopia, Somalia, Philippines, China (excluding Hong Kong and Taiwan), Canada, Korea, and Laos. There has been a steady increase of foreign born individuals in Dakota County, as percentages increased from 1990 (2.29%) to 2010 (7.70%).

LEP

The ten most commonly spoken first languages of individuals with Limited English Proficiency (LEP) in Dakota County are, from most populous to least populous, Spanish or Spanish Creole, African Languages, Vietnamese, Russian, Chinese, Mon-Khmer/Cambodian, Laotian, Hmong, Tagalog, and French (including Patois, Cajun). There has been a steady increase of residents with Limited English Proficiency, as percentages increased from 1990 (1.29%) to (3.72%).

Disability

Ambulatory difficulties (4.1%) have the highest rates of incidence in Dakota County. After ambulatory difficulties, independent living difficulties (3.8%) was the most common, followed by cognitive difficulties (3.6%), hearing (2.8%), self-care difficulties (1.7%) and vision difficulties (1.1%).

Sex
In Dakota County, 49.20% of residents are male, while 50.80% are female. There has been a consistent majority of female residents in Dakota County over time, though percentages since 1990 (males 49.44%, females 50.56%) have only seen a slight shift in 2010 (males 49.04%, females 50.96%)**.**

Age
In Dakota County, working age adults are the clear majority (63.57%), followed by minors under 18 (24.83%) and seniors (12.60%).

Families with Children
In Dakota County, there are 52,284 families with children, making up 32.93% percent of the population. There has been a slow decline in families with children in the county, as the percentage in 1990 (57.47%) slightly decreased in 2000 (56.95%), to then drop in 2010 (49.79%).

Table 4.1: Demographics, Hennepin County

	Hennepin County			Minneapolis-St. Paul-Bloomington, MN-WI Metro Area		
Race/Ethnicity	**#**		**%**	**#**		**%**
White, Non-Hispanic		851,532	69.53%		2,697,773	76.51%
Black, Non-Hispanic		153,651	12.55%		278,802	7.91%
Hispanic		84,059	6.86%		201,417	5.71%
Asian/Pacific Is., Non-Hispanic		237,710	19.41%		225248	6.39%
Native American, Non-Hisp.		6,507	0.53%		16,974	0.48%
Two+ Races, Non-Hispanic		40,454	3.30%		99,725	2.83%
Other, Non-Hispanic		2,920	0.24%		6,210	0.18%
#1 country of origin	Mexico	24,508	14.42%	Mexico	48,649	13.28%
#2 country of origin	India	15,789	9.29%	India	26,441	7.22%
#3 country of origin	Somalia	15,541	9.15%	Somalia	23,554	6.43%
#4 country of origin	Ethiopia	8,313	4.89%	Laos	23,080	6.30%
#5 country of origin	Liberia	8,285	4.88%	Ethiopia	17,546	4.79%
#6 country of origin	Laos	7,664	4.51%	Vietnam	16,411	4.48%
#7 country of origin	Vietnam	6,496	3.82%	Thailand	16,235	4.43%
#8 country of origin	China, excluding Hong Kong and Taiwan	6,495	3.82%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	Korea	5,257	3.09%	Liberia	11,449	3.13%
#10 country of origin	Kenya	4,859	2.86%	Korea	11,236	3.07%
#1 LEP Language	Spanish or Spanish Creole	31,674	2.83%	Spanish or Spanish Creole	63,539	1.97%
#2 LEP Language	African languages	16,606	1.48%	African Languages	27,394	0.85%
#3 LEP Language	Hmong	7,200	0.64%	Hmong	24,721	0.77%
#4 LEP Language	Vietnamese	5,446	0.49%	Vietnamese	12,074	0.37%

#5 LEP Language	Chinese	4,187	0.37%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Russian	3,075	0.27%	Chinese	8,973	0.28%
#7 LEP Language	Other Asian languages	2,778	0.25%	Russian	6,435	0.20%
#8 LEP Language	Laotian	2,078	0.19%	Laotian	3,849	0.12%
#9 LEP Language	French (incl. Patois, Cajun)	1,374	0.12%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	Mon-Khmer, Cambodian	1,051	0.09%	Arabic	2,820	0.09%
Hearing difficulty		34,835	2.9%		105,329	3.0%
Vision difficulty		18,382	1.5%		49,528	1.4%
Cognitive difficulty		50,651	4.5%		138,788	4.2%
Ambulatory difficulty		54,144	4.8%		148,966	4.6%
Self-care difficulty		24,294	2.1%		65,395	2.0%
Independent living difficulty		43,381	4.6%		116,400	4.4%
Male		604,629	49.37%		1,745,774	49.51%
Female		620,134	50.63%		1,780,375	50.49%
Under 18		271,450	22.16%		846,375	24.0%
18-64		794,981	64.91%		2,231,257	63.3%
65+		158,332	12.93%		448,517	12.7%
Families with children		131,629	26.37%		409.814	30.23%

Source: American Community Survey Estimates, 2013-2017

Table 4.2: Demographic Trends, Hennepin County

	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	**#**	**%**	**#**	**%**	**#**	**%**
White, Non-Hispanic	418607	94.61	415299	86.39	386,488	75.53%
Black, Non-Hispanic	8846	2	27875	5.8	56,391	11.02%
Hispanic	4038	0.91	11404	2.37	26,970	5.27%
Asian or Pacific Islander, Non-Hispanic	8392	1.9	21660	4.51	37,189	7.27%
Native American, Non-Hispanic	1863	0.42	3162	0.66	3,524	0.69%
National Origin						
Foreign-born	14440	3.26	35828	7.45	57,923	11.32%
LEP						
Limited English Proficiency	7689	1.74	17537	3.65	27,076	5.29%
Sex						
Male	213337	48.22	234888	48.85	249,297	48.72%
Female	229096	51.78	245964	51.15	262,386	51.28%

Age						
Under 18	108249	24.47	123842	25.75	126,243	24.67%
18-64	282458	63.84	297709	61.91	321,975	62.92%
65+	51725	11.69	59301	12.33	63,465	12.40%
Family Type						
Families with children	57864	48.06	51841	49.35	62,022	47.16%

Source: Decennial Census, 1990, 2000, 2010

Race

In Hennepin County, the majority of residents were white, Non-Hispanic (69.53%), followed by Asian Americans or Pacific Islanders, Non-Hispanic (19.41%), Black, Non-Hispanic (12.55%), Hispanic or Latino (6.86%), Two+ Races, Non-Hispanic (3.30%), Native Americans, Non-Hispanic (0.53%) and lastly, Other, Non-Hispanic (0.24%). Between 1990 and 2010 there was a decrease in the population of white, Non-Hispanic citizens in the county. In 1990 the white, Non-Hispanic population percentage was 94.61%, however by 2010 that percentage declined to 75.53%. As this percentage decreased the percentage of citizens of color in the county gradually increased from 2.0% to 11.02% for Black, Non-Hispanics, 0.91% to 5.27% for Hispanics, 1.90% to 7.27% for Asian or Pacific Islander, Non-Hispanics, and 0.42% to 0.69% for Native American, Non-Hispanics.

National Origin

The ten most common national origins in Hennepin County are, from most populous to least populous, Mexico, India, Somalia, Ethiopia, Liberia, Laos, Vietnam, China (excluding Hong Kong and Taiwan), Korea, and Kenya. There has been a steady increase of foreign born individuals in Hennepin County as percentages increased from 1990 (3.26%) to 2010 (11.32%).

LEP

The ten most commonly spoken first languages of individuals with Limited English Proficiency (LEP) in Hennepin County are, from most populous to least populous, Spanish or Spanish Creole, African Languages, Hmong, Vietnamese, Chinese, Russian, Other Asian languages, Laotian, French (including Patois, Cajun), and Mon-Khmer/Cambodian. There has been a steady increase of individuals with Limited English Proficiency, as percentages increased from 1990 (1.74%) to 2010 (5.29%).

Disability

Ambulatory difficulties (4.8%) have the highest rates of incidence in Hennepin County. After ambulatory difficulties, independent living difficulties (4.6%) was the most common, followed by cognitive difficulties (3.6%), hearing (2.8%), self-care difficulties (1.7%) and vision difficulties (1.1%).

Sex

In Hennepin County, 49.37% of residents are male, while 50.63% are female. There has been a consistent majority of female residents in Hennepin County over time.

Age
Working age adults as the clear majority (64.91%), followed by minors under 18 (22.16%) and seniors (12.93%).

Families with Children
In Hennepin County, there are 131,629 families with children, making up 26.37% percent of the population. There has been a fluctuation in families with children in Hennepin County, as the percentage in 1990 (48.06%) grew in 2000 (49.35%), then decreased in 2010 (47.16%).

Table 5.1: Demographics, Bloomington

	Bloomington			Minneapolis-St. Paul-Bloomington, MN-WI Metro Area		
Race/Ethnicity	**#**		**%**	**#**		**%**
White, Non-Hispanic		61,970	72.55%		2,697,773	76.51%
Black, Non-Hispanic		7,848	9.19%		278,802	7.91%
Hispanic		7,484	8.76%		201,417	5.71%
Asian/Pacific Is., Non-Hispanic		15,332	17.95%		225248	6.39%
Native American, Non-Hisp.		205	0.24%		16,974	0.48%
Two+ Races, Non-Hispanic		2,791	3.27%		99,725	2.83%
Other, Non-Hispanic		303	0.35%		6,210	0.18%
#1 country of origin	Mexico	2,510	23.24%	Mexico	48,649	13.28%
#2 country of origin	Somalia	703	6.51%	India	26,441	7.22%
#3 country of origin	Vietnam	648	6.00%	Somalia	23,554	6.43%
#4 country of origin	Ethiopia	615	5.69%	Laos	23,080	6.30%
#5 country of origin	El Salvador	606	5.61%	Ethiopia	17,546	4.79%
#6 country of origin	India	499	4.62%	Vietnam	16,411	4.48%
#7 country of origin	Cambodia	417	3.86%	Thailand	16,235	4.43%
#8 country of origin	China, excluding Hong Kong and Taiwan	402	3.72%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	Kenya	387	3.58%	Liberia	11,449	3.13%
#10 country of origin	Korea	299	2.77%	Korea	11,236	3.07%
#1 LEP Language	Spanish or Spanish Creole	2,438	3.00%	Spanish or Spanish Creole	63,539	1.97%
#2 LEP Language	Vietnamese	794	0.98%	African Languages	27,394	0.85%
#3 LEP Language	African languages	733	0.90%	Hmong	24,721	0.77%
#4 LEP Language	Mon-Khmer, Cambodian	483	0.59%	Vietnamese	12,074	0.37%
#5 LEP Language	Chinese	264	0.33%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Arabic	146	0.18%	Chinese	8,973	0.28%
#7 LEP Language	Laotian	140	0.17%	Russian	6,435	0.20%

#8 LEP Language	French (incl. Patois, Cajun)	140	0.17%	Laotian	3,849	0.12%
#9 LEP Language	Other Asian languages	135	0.17%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	Russian	126	0.16%	Arabic	2,820	0.09%
Hearing difficulty		3,108	3.7%		105,329	3.0%
Vision difficulty		1,625	1.9%		49,528	1.4%
Cognitive difficulty		3,687	4.6%		138,788	4.2%
Ambulatory difficulty		4,433	5.6%		148,966	4.6%
Self-care difficulty		1,961	2.5%		65,395	2.0%
Independent living difficulty		3,469	5.1%		116,400	4.4%
Male		41,861	49.01%		1,745,774	49.51%
Female		43,556	50.99%		1,780,375	50.49%
Under 18		16,569	19.40%		846,375	24.0%
18-64		52,754	61.76%		2,231,257	63.3%
65+		16,094	18.84%		448,517	12.7%
Families with children		8,259	22.80%		409.814	30.23%

Source: American Community Survey Estimates, 2013-2017

Table 5.2: Demographic Trends, Bloomington

	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	**#**	**%**	**#**	**%**	**#**	**%**
White, Non-Hispanic	81140	94.1	74007	86.89	63,974	77.18%
Black, Non-Hispanic	1346	1.56	3432	4.03	7,067	8.53%
Hispanic	792	0.92	2289	2.69	5,623	6.78%
Asian or Pacific Islander, Non-Hispanic	2603	3.02	4775	5.61	5,458	6.58%
Native American, Non-Hispanic	220	0.26	473	0.56	596	0.72%
National Origin						
Foreign-born	3484	4.04	6593	7.74	8,883	10.72%
LEP						
Limited English Proficiency	1663	1.93	3547	4.16	4,795	5.78%
Sex						
Male	41681	48.36	41248	48.41	40,115	48.39%
Female	44504	51.64	43954	51.59	42,778	51.61%
Age						
Under 18	18374	21.32	17893	21	16,363	19.74%
18-64	58984	68.44	53858	63.21	51,312	61.90%
65+	8828	10.24	13451	15.79	15,218	18.36%

Family Type						
Families with children	10011	42.2	8183	39.86	8,202	37.94%

Source: Decennial Census, 1990, 2000, 2010

Race

In Bloomington, the majority of residents are white, Non-Hispanic (72.55%), followed by Asian Americans or Pacific Islanders, Non-Hispanic (17.95%), Black, Non-Hispanic (9.19%), Hispanic or Latino (8.76%), Two+ Races, Non-Hispanic (3.27%), Other, Non-Hispanic (0.35%). and lastly, Native Americans, Non-Hispanic (0.24%). Between 1990 and 2010, there was a large decrease in the population of white, Non-Hispanic citizens in Bloomington. In 1990, the white, Non-Hispanic citizen percentage was 94.10%, however by 2010 that percentage declined to 77.18%. As this percentage decreased, the percentage of citizens of color in Bloomington gradually increased from 1.56% to 8.53% for Black, Non-Hispanics, 0.92% to 6.78% for Hispanics, 3.02% to 6.58% for Asian or Pacific Islander, Non-Hispanics, and 0.26% to 0.72% for Native American, Non-Hispanics.

National Origin

The ten most common national origins in Bloomington are, from most populous to least populous, Mexico, Somalia, Vietnam, Ethiopia, El Salvador, India, Cambodia, China (excluding Hong Kong and Taiwan), Kenya, Korea. There has been a steady increase of foreign-born individuals in Bloomington, as percentages increased between 1990 (4.04%) to 2010 (10.72%).

LEP

The ten most commonly spoken first languages of individuals with Limited English Proficiency (LEP) in Bloomington are, from most populous to least populous, Spanish or Spanish Creole, Vietnamese, African Languages, Mon-Khmer/Cambodian, Chinese, Arabic, Laotian, French (including Patois, Cajun), Other Asian languages, and Russian. There has been a steady increase of individuals with Limited English Proficiency in Bloomington, as percentages increased between 1990 (1.93%) to 2010 (5.78%).

Disability

Ambulatory difficulties (5.1%) have the highest rates of incidence in Bloomington. After ambulatory difficulties, independent living difficulties (5.1%) was the most common, followed by cognitive difficulties (4.6%), hearing difficulties (3.7%), self-care difficulties (2.5%) and vision difficulties (1.9%).

Sex

In Bloomington, 49.01% of residents are male, while 50.99% are female. There has been a consistent, though slight, majority of female residents in Bloomington over time.

Age

Working age adults are the clear majority in Bloomington (61.76%), followed by minors under 18 (19.40%) and seniors (18.84%).

Families with Children

In Bloomington, there are 8,259 families with children, making up 22.80% percent of the population. There has been a continuing decrease in families with children in Bloomington, as the percentage in 1990 (42.20%) descends in 2000 (39.86%), and descends further in 2010 (37.94%).

Table 6.1: Demographics, Eden Prairie

	Eden Prairie			Minneapolis-St. Paul-Bloomington, MN-WI Metro Area		
Race/Ethnicity	**#**		**%**	**#**		**%**
White, Non-Hispanic		48,783	76.63%		2,697,773	76.51%
Black, Non-Hispanic		3,821	6.00%		278,802	7.91%
Hispanic		2,815	4.42%		201,417	5.71%
Asian/Pacific Is., Non-Hispanic		6,636	10.42%		225248	6.39%
Native American, Non-Hisp.		149	0.23%		16,974	0.48%
Two+ Races, Non-Hispanic		1,540	2.42%		99,725	2.83%
Other, Non-Hispanic		52	0.08%		6,210	0.18%
#1 country of origin	India	2,770	29.40%	Mexico	48,649	13.28%
#2 country of origin	China, excluding Hong Kong and Taiwan	592	6.28%	India	26,441	7.22%
#3 country of origin	Mexico	572	6.07%	Somalia	23,554	6.43%
#4 country of origin	Somalia	533	5.66%	Laos	23,080	6.30%
#5 country of origin	Ethiopia	437	4.64%	Ethiopia	17,546	4.79%
#6 country of origin	Vietnam	349	3.70%	Vietnam	16,411	4.48%
#7 country of origin	Korea	301	3.19%	Thailand	16,235	4.43%
#8 country of origin	Canada	261	2.77%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	El Salvador	236	2.51%	Liberia	11,449	3.13%
#10 country of origin	Kenya	214	2.27%	Korea	11,236	3.07%
#1 LEP Language	African languages	546	0.93%	Spanish or Spanish Creole	63,539	1.97%
#2 LEP Language	Spanish or Spanish Creole	484	0.83%	African Languages	27,394	0.85%
#3 LEP Language	Other Asian languages	380	0.65%	Hmong	24,721	0.77%
#4 LEP Language	Chinese	335	0.57%	Vietnamese	12,074	0.37%
#5 LEP Language	Vietnamese	298	0.51%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Russian	137	0.23%	Chinese	8,973	0.28%
#7 LEP Language	Mon-Khmer, Cambodian	129	0.22%	Russian	6,435	0.20%
#8 LEP Language	Korean	104	0.18%	Laotian	3,849	0.12%

#9 LEP Language	Hindi	72	0.12%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	Other Indic languages	43	0.07%	Arabic	2,820	0.09%
Hearing difficulty		1,412	2.2%		105,329	3.0%
Vision difficulty		698	1.1%		49,528	1.4%
Cognitive difficulty		1,624	2.7%		138,788	4.2%
Ambulatory difficulty		1,769	3.0%		148,966	4.6%
Self-care difficulty		1,073	1.8%		65,395	2.0%
Independent living difficulty		1,502	3.1%		116,400	4.4%
Male		32,004	50.27%		1,745,774	49.51%
Female		31,656	49.73%		1,780,375	50.49%
Under 18		15,358	24.13%		846,375	24.0%
18-64		40,807	64.10%		2,231,257	63.3%
65+		7,495	11.77%		448,517	12.7%
Families with children		8,006	31.90%		409.814	30.23%

Source: American Community Survey Estimates, 2013-2017

Table 6.2: Demographic Trends, Eden Prairie

	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	**#**	**%**	**#**	**%**	**#**	**%**
White, Non-Hispanic	37701	95.89	49228	89.66	48,654	80.03%
Black, Non-Hispanic	420	1.07	1503	2.74	3,853	6.34%
Hispanic	269	0.68	860	1.57	1,840	3.03%
Asian or Pacific Islander, Non-Hispanic	801	2.04	2979	5.43	6,104	10.04%
Native American, Non-Hispanic	60	0.15	187	0.34	242	0.40%
National Origin						
Foreign-born	1018	2.59	4866	8.86	8,593	14.13%
LEP						
Limited English Proficiency	365	0.93	2410	4.39	3,683	6.06%
Sex						
Male	19256	48.98	27106	49.37	29,468	48.47%
Female	20055	51.02	27795	50.63	31,329	51.53%
Age						
Under 18	11491	29.23	17032	31.02	16,065	26.42%
18-64	26595	67.65	35269	64.24	39,507	64.98%
65+	1225	3.12	2600	4.74	5,225	8.59%
Family Type						

Families with children	6371	59.23	7415	59.22	8,438	51.09%

Source: Decennial Census, 1990, 2000, 2010

Race

In Eden Prairie, the majority of residents are white, Non-Hispanic (76.63%), followed by Asian Americans or Pacific Islanders, Non-Hispanic (10.42%), Black, Non-Hispanic (6.00%), Hispanic or Latino (4.42%), Two+ Races, Non-Hispanic (2.42%), Native Americans, Non-Hispanic (0.23%), and lastly, Other, Non-Hispanic (0.08%). Between 1990 and 2010, there was a large decrease in the population of white, Non-Hispanic citizens in Eden Prairie. In 1990, the white, Non-Hispanic citizen percentage was 95.89%, however by 2010 that percentage declined to 80.03%. As this percentage decreased, the percentage of citizens of color in Eden Prairie gradually increased, from 1.07% to 6.34% for Black, Non-Hispanics, 0.68% to 3.03% for Hispanics, 2.04% to 10.04% for Asian or Pacific Islander, Non-Hispanics, and 0.15% to 0.40% for Native American, Non-Hispanics.

National Origin

The ten most common national origins in Eden Prairie are, from most populous to least populous, India, China (excluding Hong Kong and Taiwan), Mexico, Somalia, Ethiopia, Vietnam, Korea, Canada, El Salvador, Kenya. There has been a large trend of foreign-born individuals in Eden Prairie, as percentages increased between 1990 (2.59%) and 2010 (14.13%).

LEP

The ten most commonly spoken first languages of individuals with Limited English Proficiency (LEP) in Eden Prairie are, from most populous to least populous, African Languages, Spanish or Spanish Creole, Other Asian languages, Chinese, Vietnamese, Russian, Mon-Khmer/Cambodian, Korean, Hindi, and Other Indic languages. There has been a steady increase of individuals in Eden Prairie with Limited English Proficiency as percentages increased between 1990 (0.93%) and 2010 (6.06%).

Disability

Independent living difficulties (3.1%) have the highest rates of incidence in Eden Prairie. After independent living difficulties, ambulatory difficulties (3.0%) was the most common, followed by cognitive difficulties (2.7%), hearing difficulties (2.2%), self-care difficulties (1.8%) and vision difficulties (1.1%)**.**

Sex

In Eden Prairie, 50.27% of residents are male, while 49.73% are female. There has been a fluctuating rate of males and females in Eden Prairie over time as percentages in 1990 (males 48.98%, females 51.02%) have only shifted slightly in 2010 (males 48.47%, females 51.53%).

Age

The age distribution in Eden Prairie is distributed with working age adults as the clear majority (67.65%), followed by minors under 18 (29.23%) and seniors (3.12%).

Families with Children

In Eden Prairie, there are 8,006 families with children, making up 31.90% percent of the population. There has been a continuing increase in families with children in Eden Prairie, despite the percentage decrease. The percentage in 1990 (59.23%) slightly descends in 2000 (59.22%), and descends further in 2010 (51.09%).

Table 7.1: Demographics, Minneapolis

	Minneapolis			Minneapolis-St. Paul-Bloomington, MN-WI Metro Area		
Race/Ethnicity	**#**		**%**	**#**		**%**
White, Non-Hispanic		246,351	59.87%		2,697,773	76.51%
Black, Non-Hispanic		76,499	18.59%		278,802	7.91%
Hispanic		40,147	9.76%		201,417	5.71%
Asian/Pacific Is., Non-Hispanic		116,646	28.35%		225248	6.39%
Native American, Non-Hisp.		4,293	1.04%		16,974	0.48%
Two+ Races, Non-Hispanic		18,341	4.46%		99,725	2.83%
Other, Non-Hispanic		964	0.23%		6,210	0.18%
#1 country of origin	Mexico	12,084	18.49%	Mexico	48,649	13.28%
#2 country of origin	Somalia	11,974	18.32%	India	26,441	7.22%
#3 country of origin	Ethiopia	5,252	8.03%	Somalia	23,554	6.43%
#4 country of origin	Ecuador	4,075	6.23%	Laos	23,080	6.30%
#5 country of origin	Laos	2,775	4.25%	Ethiopia	17,546	4.79%
#6 country of origin	India	2,475	3.79%	Vietnam	16,411	4.48%
#7 country of origin	Korea	2,339	3.58%	Thailand	16,235	4.43%
#8 country of origin	China, excluding Hong Kong and Taiwan	2,307	3.53%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	Thailand	1,700	2.60%	Liberia	11,449	3.13%
#10 country of origin	Canada	1,113	1.70%	Korea	11,236	3.07%
#1 LEP Language	Spanish or Spanish Creole	17,573	4.72%	Spanish or Spanish Creole	63,539	1.97%
#2 LEP Language	African languages	10,517	2.83%	African Languages	27,394	0.85%
#3 LEP Language	Hmong	4,241	1.14%	Hmong	24,721	0.77%
#4 LEP Language	Chinese	1,375	0.37%	Vietnamese	12,074	0.37%
#5 LEP Language	Vietnamese	782	0.21%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Russian	480	0.13%	Chinese	8,973	0.28%
#7 LEP Language	Arabic	476	0.13%	Russian	6,435	0.20%
#8 LEP Language	Laotian	453	0.12%	Laotian	3,849	0.12%
#9 LEP Language	Korean	421	0.11%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	French (incl. Patois, Cajun)	353	0.09%	Arabic	2,820	0.09%

Hearing difficulty	10,690	2.6%	105,329	3.0%
Vision difficulty	7,338	1.8%	49,528	1.4%
Cognitive difficulty	22,024	5.8%	138,788	4.2%
Ambulatory difficulty	20,185	5.3%	148,966	4.6%
Self-care difficulty	8,480	2.2%	65,395	2.0%
Independent living difficulty	15,251	4.7%	116,400	4.4%
Male	208,322	50.63%	1,745,774	49.51%
Female	203,130	49.37%	1,780,375	50.49%
Under 18	81,899	19.90%	846,375	24.0%
18-64	291,835	70.93%	2,231,257	63.3%
65+	37,718	9.17%	448,517	12.7%
Families with children	36,515	21.22%	409.814	30.23%

Source: American Community Survey Estimates, 2013-2017

Table 7.2: Demographic Trends, Minneapolis

	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	**#**	**%**	**#**	**%**	**#**	**%**
White, Non-Hispanic	285356	77.45	239071	62.48	230,652	60.29%
Black, Non-Hispanic	47111	12.79	76661	20.04	77,888	20.36%
Hispanic	7839	2.13	29164	7.62	40,072	10.47%
Asian or Pacific Islander, Non-Hispanic	15316	4.16	26015	6.8	24,446	6.39%
Native American, Non-Hispanic	11748	3.19	9781	2.56	8,422	2.20%
National Origin						
Foreign-born	22621	6.14	55475	14.5	57,201	14.95%
LEP						
Limited English Proficiency	13449	3.65	37692	9.86	35,232	9.21%
Sex						
Male	178547	48.47	191601	50.1	192,421	50.30%
Female	189840	51.53	190852	49.9	190,157	49.70%
Age						
Under 18	75818	20.58	86609	22.65	77,203	20.18%
18-64	245023	66.51	261229	68.3	274,864	71.85%
65+	47546	12.91	34615	9.05	30,512	7.98%
Family Type						
Families with children	36955	47.1	33666	49.87	35,029	48.67%

Source: Decennial Census, 1990, 2000, 2010

Race

In Minneapolis, the majority of residents are white, Non-Hispanic (59.87%), followed by Asian Americans or Pacific Islanders, Non-Hispanic (28.35%), Black, Non-Hispanic (18.59%), Hispanic or Latino (9.76%), Two+ Races, Non-Hispanic (4.46%), Native Americans, Non-Hispanic (1.04%), and lastly, Other, Non-Hispanic (0.23%). Between 1990 and 2010, there was a decrease in the population of white, Non-Hispanic citizens in Minneapolis. In 1990, the white, Non-Hispanic citizen percentage was 77.45%, however by 2010 that percentage declined to 60.29%. As this percentage decreased, the percentage of citizens of color in Minneapolis largely increased from 12.79% to 20.39% for Black, Non-Hispanics, 2.13% to 10.47% for Hispanics, 4.16% to 6.39% for Asian or Pacific Islander, Non-Hispanics, and 3.19% to 2.20% for Native American, Non-Hispanics.

National Origin

The ten most common national origins in Minneapolis are, from most populous to least populous, Mexico, Somalia, Ethiopia, Ecuador, Laos, India, Korea, China (excluding Hong Kong and Taiwan), Thailand, Canada. There has been an increase of foreign-born individuals in Minneapolis, as percentages increased between 1990 (6.14%) and 2010 (14.95%).

LEP

The ten most commonly spoken first languages of individuals with Limited English Proficiency (LEP) in Minneapolis are, from most populous to least populous, Spanish or Spanish Creole, African languages, Hmong, Chinese, Vietnamese, Russian, Arabic, Laotian, Korean, French (including Patois, Cajun). There has been a steady trend of individuals in Minneapolis with Limited English Proficiency, as percentages increased between 1990 (3.65%) and 2010 (9.21%).

Disability

Cognitive difficulties (5.8%) have the highest rates of incidence in Minneapolis. After cognitive difficulties, ambulatory difficulties (5.3%) was the most common, followed by independent living difficulties (4.7%), hearing difficulties (2.6%), self-care difficulties (2.2%) and vision difficulties (1.8%).

Sex

In Minneapolis, 50.63% of residents are male, while 49.37% are female. There has been an increasing rate of more males than females in Minneapolis over time as percentages in 1990 (males 48.47%, females 51.53%) increased in 2010 (males 50.30%, females 49.70%).

Age

In Minneapolis, working age adults are the clear majority (70.93%), followed by minors under 18 (19.90%) and seniors (9.17%).

Families with Children

In Minneapolis, there are 36,515 families with children, making up 21.22% percent of the population. There has been a fluctuating rate of families with children in Minneapolis over time. The percentage in 1990 (47.10%) ascends in 2000 (49.87%), and descends again in 2010 (48.67%).

Table 8.1: Demographics, Minnetonka

	Minnetonka			Minneapolis-St. Paul-Bloomington, MN-WI Metro Area		
Race/Ethnicity	**#**		**%**	**#**		**%**
White, Non-Hispanic		44,863	86.11%		2,697,773	76.51%
Black, Non-Hispanic		2,218	4.26%		278,802	7.91%
Hispanic		1,182	2.27%		201,417	5.71%
Asian/Pacific Is., Non-Hispanic		3,400	6.53%		225248	6.39%
Native American, Non-Hisp.		69	0.13%		16,974	0.48%
Two+ Races, Non-Hispanic		1,301	2.50%		99,725	2.83%
Other, Non-Hispanic		77	0.15%		6,210	0.18%
#1 country of origin	India	906	17.69%	Mexico	48,649	13.28%
#2 country of origin	Russia	471	9.20%	India	26,441	7.22%
#3 country of origin	Ukraine	368	7.19%	Somalia	23,554	6.43%
#4 country of origin	Vietnam	251	4.90%	Laos	23,080	6.30%
#5 country of origin	Ethiopia	229	4.47%	Ethiopia	17,546	4.79%
#6 country of origin	Canada	190	3.71%	Vietnam	16,411	4.48%
#7 country of origin	Korea	188	3.67%	Thailand	16,235	4.43%
#8 country of origin	Mexico	175	3.42%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	Bosnia and Herzegovina	161	3.14%	Liberia	11,449	3.13%
#10 country of origin	China, excluding Hong Kong and Taiwan	157	3.07%	Korea	11,236	3.07%
#1 LEP Language	Russian	452	0.93%	Spanish or Spanish Creole	63,539	1.97%
#2 LEP Language	African languages	389	0.80%	African Languages	27,394	0.85%
#3 LEP Language	Spanish or Spanish Creole	282	0.58%	Hmong	24,721	0.77%
#4 LEP Language	Vietnamese	147	0.30%	Vietnamese	12,074	0.37%
#5 LEP Language	Other Asian languages	129	0.26%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Chinese	112	0.23%	Chinese	8,973	0.28%
#7 LEP Language	French Creole	66	0.14%	Russian	6,435	0.20%
#8 LEP Language	Serbo-Croatian	63	0.13%	Laotian	3,849	0.12%
#9 LEP Language	Other Slavic languages	50	0.10%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	Mon-Khmer, Cambodian	49	0.10%	Arabic	2,820	0.09%

Hearing difficulty	1,455	2.8%	105,329	3.0%
Vision difficulty	651	1.3%	49,528	1.4%
Cognitive difficulty	1,687	3.4%	138,788	4.2%
Ambulatory difficulty	2,502	5.1%	148,966	4.6%
Self-care difficulty	1,104	2.3%	65,395	2.0%
Independent living difficulty	1,771	4.3%	116,400	4.4%
Male	24,978	47.94%	1,745,774	49.51%
Female	27,124	52.06%	1,780,375	50.49%
Under 18	10,382	19.93%	846,375	24.0%
18-64	31,428	60.32%	2,231,257	63.3%
65+	10,292	19.75%	448,517	12.7%
Families with children	5,675	24.63%	409.814	30.23%

Source: American Community Survey Estimates, 2013-2017

Table 8.2: Demographic Trends, Minnetonka

	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	**#**	**%**	**#**	**%**	**#**	**%**
White, Non-Hispanic	46531	96.5	48065	93.68	44,081	88.63%
Black, Non-Hispanic	434	0.9	921	1.8	1,837	3.69%
Hispanic	385	0.8	655	1.28	1,169	2.35%
Asian or Pacific Islander, Non-Hispanic	738	1.53	1365	2.66	1,566	3.15%
Native American, Non-Hispanic	72	0.15	159	0.31	103	0.21%
National Origin						
Foreign-born	1277	2.65	2942	5.73	3,860	7.76%
LEP						
Limited English Proficiency	502	1.04	1169	2.28	1,669	3.36%
Sex						
Male	23475	48.69	24510	47.78	23,633	47.52%
Female	24739	51.31	26791	52.22	26,101	52.48%
Age						
Under 18	11670	24.2	12238	23.85	10,349	20.81%
18-64	31807	65.97	31934	62.25	31,095	62.52%
65+	4737	9.82	7130	13.9	8,290	16.67%
Family Type						
Families with children	6192	46.26	4682	43.99	5,468	40.15%

Source: Decennial Census, 1990, 2000, 2010

Race
In Minnetonka, the majority of residents were white, Non-Hispanic (86.11%), followed by Asian Americans or Pacific Islanders, Non-Hispanic (6.53%), Black, Non-Hispanic (4.26%), Two+ Races, Non-Hispanic (2.50%), Hispanic or Latino (2.27%), Other, Non-Hispanic (0.15%), and lastly Native Americans, Non-Hispanic (0.13%). Between 1990 and 2010, there was a decrease in the population of white, Non-Hispanic citizens in Minnetonka. In 1990, the white, Non-Hispanic citizen percentage was 96.50%, however by 2010 that percentage declined to 88.63%. As this percentage decreased, the percentage of citizens of color in Minnetonka largely increased from 0.9% to 3.69% for Black, Non-Hispanics, 0.8% to 2.35% for Hispanics, 1.53% to 3.15% for Asian or Pacific Islander, Non-Hispanics, and 0.15% to 0.21% for Native American, Non-Hispanics.

National Origin
The ten most common national origins in Minnetonka are, from most populous to least populous, India, Russia, Ukraine, Vietnam, Ethiopia, Vietnam, Ethiopia, Canada, Korea, Mexico, Bosnia and Herzegovina, China (excluding Hong Kong and Taiwan). There has been an increase of foreign-born individuals in Minnetonka, as percentages increased from 1990 (2.65%) to 2010 (7.76%).

LEP
The ten most commonly spoken first languages of individuals with Limited English Proficiency (LEP) in Minnetonka are, from most populous to least populous, Russian, African languages, Spanish or Spanish Creole, Vietnamese, Other Asian languages, Chinese, French Creole, Serbo-Croatian, Other Slavic languages, Mon-Khmer/Cambodian. There has been a slight increase of individuals with Limited English Proficiency, as percentages increased from 1990 (1.04%) to 2010 (3.36%).

Disability
Ambulatory difficulties (5.1%) have the highest rates of incidence in Minnetonka. After ambulatory difficulties, independent living difficulties (4.3%) was the most common, followed by cognitive difficulties (3.4%), hearing difficulties (2.8%), self-care difficulties (2.3%) and vision difficulties (1.3%).

Sex
In Minnetonka, 47.94% of residents are male, while 52.06% are female. There has been a consistent, though slight, majority of female residents in Minnetonka over time.

Age
Working age adults are the clear majority in Minnetonka, (60.32%), followed by minors under 18 (19.93%) and seniors (19.75%).

Families with Children
In Minnetonka, there are 5,675 families with children, making up 24.63% percent of the population. There has been a decreasing rate of families with children in Minnetonka over time. The percentage in 1990 (46.26%) deceased in 2000 (43.99%), and decreased further in 2010 (40.15%).

Table 9.1: Demographics, Plymouth

	Plymouth			Minneapolis-St. Paul-Bloomington, MN-WI Metro Area		
Race/Ethnicity	**#**		**%**	**#**		**%**
White, Non-Hispanic		59,582	78.13%		2,697,773	76.51%
Black, Non-Hispanic		4,283	5.62%		278,802	7.91%
Hispanic		3,376	4.43%		201,417	5.71%
Asian/Pacific Is., Non-Hispanic		7,659	10.04%		225248	6.39%
Native American, Non-Hisp.		231	0.30%		16,974	0.48%
Two+ Races, Non-Hispanic		1,857	2.44%		99,725	2.83%
Other, Non-Hispanic		54	0.07%		6,210	0.18%
#1 country of origin	India	2,636	26.54%	Mexico	48,649	13.28%
#2 country of origin	China, excluding Hong Kong and Taiwan	700	7.05%	India	26,441	7.22%
#3 country of origin	Mexico	585	5.89%	Somalia	23,554	6.43%
#4 country of origin	Nigeria	497	5.00%	Laos	23,080	6.30%
#5 country of origin	Korea	472	4.75%	Ethiopia	17,546	4.79%
#6 country of origin	Liberia	360	3.62%	Vietnam	16,411	4.48%
#7 country of origin	Ukraine	295	2.97%	Thailand	16,235	4.43%
#8 country of origin	Belarus	288	2.90%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	Vietnam	234	2.36%	Liberia	11,449	3.13%
#10 country of origin	Russia	223	2.24%	Korea	11,236	3.07%
#1 LEP Language	Chinese	572	0.83%	Spanish or Spanish Creole	63,539	1.97%
#2 LEP Language	Spanish or Spanish Creole	406	0.59%	African Languages	27,394	0.85%
#3 LEP Language	Russian	400	0.58%	Hmong	24,721	0.77%
#4 LEP Language	Other Asian languages	307	0.44%	Vietnamese	12,074	0.37%
#5 LEP Language	African languages	199	0.29%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Other Slavic languages	120	0.17%	Chinese	8,973	0.28%
#7 LEP Language	Hindi	113	0.16%	Russian	6,435	0.20%
#8 LEP Language	Vietnamese	90	0.13%	Laotian	3,849	0.12%
#9 LEP Language	Other Indic languages	89	0.13%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	Laotian	78	0.11%	Arabic	2,820	0.09%
Hearing difficulty		1,929	2.6%		105,329	3.0%
Vision difficulty		1,047	1.4%		49,528	1.4%

Cognitive difficulty	1,895	2.7%	138,788	4.2%
Ambulatory difficulty	2,483	3.5%	148,966	4.6%
Self-care difficulty	1,089	1.5%	65,395	2.0%
Independent living difficulty	2,104	3.6%	116,400	4.4%
Male	37,003	48.52%	1,745,774	49.51%
Female	39,255	51.48%	1,780,375	50.49%
Under 18	17,684	23.19%	846,375	24.0%
18-64	47,385	62.14%	2,231,257	63.3%
65+	11,189	14.67%	448,517	12.7%
Families with children	9,534	30.88%	409.814	30.23%

Source: American Community Survey Estimates, 2013-2017

Table 9.2: Demographic Trends, Plymouth

	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	**#**	**%**	**#**	**%**	**#**	**%**
White, Non-Hispanic	48335	94.96	59576	90.41	58,259	82.55%
Black, Non-Hispanic	807	1.59	2040	3.1	4,279	6.06%
Hispanic	509	1	1077	1.63	2,109	2.99%
Asian or Pacific Islander, Non-Hispanic	1012	1.99	2754	4.18	5,440	7.71%
Native American, Non-Hispanic	172	0.34	306	0.46	357	0.51%
National Origin						
Foreign-born	1330	2.61	4842	7.35	7,531	10.67%
LEP						
Limited English Proficiency	728	1.43	1833	2.78	2,499	3.54%
Sex						
Male	25109	49.32	32495	49.32	34,183	48.43%
Female	25799	50.68	33397	50.68	36,393	51.57%
Age						
Under 18	13972	27.45	18186	27.6	16,880	23.92%
18-64	34439	67.65	42709	64.82	45,174	64.01%
65+	2496	4.9	4996	7.58	8,523	12.08%
Family Type						
Families with children	7214	52.97	7161	52.39	8,929	46.41%

Source: Decennial Census, 1990, 2000, 2010

Race

In Plymouth, the majority of residents were white, Non-Hispanic (78.13%), followed by Asian Americans or Pacific Islanders, Non-Hispanic(10.04%), Black, Non-Hispanic (5.62%), Hispanic or Latino (4.43%), Two+ Races, Non-Hispanic (2.44%), Native Americans, Non-Hispanic

(0.30%), and lastly Other, Non-Hispanic (0.07%). Between 1990 and 2010, there was a decrease in the population of white, Non-Hispanic citizens in Plymouth. In 1990, the white, Non-Hispanic citizen percentage was 94.96%, however by 2010 that percentage declined to 82.55%. As this percentage decreased, the percentage of citizens of color in Plymouth from 1.59% to 6.06% for Black, Non-Hispanics, 1.00% to 2.99% for Hispanics, 1.99% to 7.71% for Asian or Pacific Islander, Non-Hispanics, and 0.34% to 0.51% for Native American, Non-Hispanics.

National Origin
The ten most common national origins in Plymouth are, from most populous to least populous, India, China (excluding Hong Kong and Taiwan), Mexico, Nigeria, Korea, Liberia, Ukraine, Belarus, Vietnam, and Russia. There has been an increase of foreign-born individuals in Plymouth, as percentages increased from 1990 (2.61%) to 2010 (10.67%).

LEP
The ten most commonly spoken first languages of individuals with Limited English Proficiency (LEP) in Plymouth are, from most populous to least populous, Chinese, Spanish or Spanish Creole, Russian, Other Asian languages, African languages, Other Slavic languages, Hindi, Vietnamese, Other Indic languages, and Laotian. There has been a slight increase of individuals with Limited English Proficiency in Plymouth, as percentages increased from 1990 (1.43%) to 2010 (3.54%).

Disability
Independent living difficulties (3.6%) have the highest rates of incidence in Plymouth. After independent living difficulties, ambulatory difficulties (3.5%) was the most common, followed by cognitive difficulties (2.7%), hearing difficulties (2.6%), self-care difficulties (1.5%) and vision difficulties (1.4%).

Sex
In Plymouth, 48.52% of residents are male, while 51.48% are female. There has been a consistent, though slight, majority of female residents in Plymouth over time.

Age
In Plymouth, working age adults are the clear majority (62.14%), followed by minors under 18 (23.19%) and seniors (14.67%).

Families with Children
In Plymouth, there are 9,534 families with children, making up 30.88% percent of the population. There has a decreasing rate of families with children in Plymouth over time. The percentage in 1990 (52.97%) descends in 2000 (52.39%), and descends further in 2010 (46.41%).

Table 10.1: Demographics, Ramsey County

	Ramsey County		Minneapolis-St. Paul-Bloomington, MN-WI Metro Area	
Race/Ethnicity	**#**	**%**	**#**	**%**
White, Non-Hispanic	339,170	63.06%	2,697,773	76.51%
Black, Non-Hispanic	60,445	11.24%	278,802	7.91%
Hispanic	39,948	7.43%	201,417	5.71%

Asian/Pacific Is., Non-Hispanic		100,393	18.66%		225248	6.39%
Native American, Non-Hisp.		2,699	0.50%		16,974	0.48%
Two+ Races, Non-Hispanic		19,396	3.61%		99,725	2.83%
Other, Non-Hispanic		922	0.17%		6,210	0.18%
#1 country of origin	Laos	10,841	12.94%	Mexico	48,649	13.28%
#2 country of origin	Thailand	10,483	12.52%	India	26,441	7.22%
#3 country of origin	Mexico	8,201	9.79%	Somalia	23,554	6.43%
#4 country of origin	Burma	5,839	6.97%	Laos	23,080	6.30%
#5 country of origin	Ethiopia	4,855	5.80%	Ethiopia	17,546	4.79%
#6 country of origin	Somalia	3,799	4.54%	Vietnam	16,411	4.48%
#7 country of origin	Vietnam	3,616	4.32%	Thailand	16,235	4.43%
#8 country of origin	China, excluding Hong Kong and Taiwan	3,274	3.91%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	India	3,174	3.79%	Liberia	11,449	3.13%
#10 country of origin	Korea	1,838	2.19%	Korea	11,236	3.07%
#1 LEP Language	Hmong	14,780	3.02%	Spanish or Spanish Creole	63,539	1.97%
#2 LEP Language	Spanish or Spanish Creole	11,698	2.39%	African Languages	27,394	0.85%
#3 LEP Language	Other Asian languages	6,911	1.41%	Hmong	24,721	0.77%
#4 LEP Language	African languages	6,266	1.28%	Vietnamese	12,074	0.37%
#5 LEP Language	Vietnamese	2,134	0.44%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Chinese	1,908	0.39%	Chinese	8,973	0.28%
#7 LEP Language	Other Indic languages	890	0.18%	Russian	6,435	0.20%
#8 LEP Language	Arabic	704	0.14%	Laotian	3,849	0.12%
#9 LEP Language	Mon-Khmer, Cambodian	490	0.10%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	Russian	487	0.10%	Arabic	2,820	0.09%
Hearing difficulty		17,277	3.2%		105,329	3.0%
Vision difficulty		9,489	1.8%		49,528	1.4%
Cognitive difficulty		26,808	5.4%		138,788	4.2%
Ambulatory difficulty		27,833	5.6%		148,966	4.6%
Self-care difficulty		12,343	2.5%		65,395	2.0%
Independent living difficulty		23,053	5.6%		116,400	4.4%
Male		261,783	48.67%		1,745,774	49.51%
Female		276,110	51.33%		1,780,375	50.49%

Under 18	125,535	23.34%	846,375	24.0%
18-64	340,455	63.29%	2,231,257	63.3%
65+	71,903	13.37%	448,517	12.7%
Families with children	57,343	27.50%	409.814	30.23%

Source: American Community Survey Estimates, 2013-2017

Table 10.2: Demographic Trends, Ramsey County

	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	**#**	**%**	**#**	**%**	**#**	**%**
White, Non-Hispanic	202486	94.67	201118	89.68	181,139	80.88%
Black, Non-Hispanic	2503	1.17	6309	2.81	11,217	5.01%
Hispanic	2388	1.12	4261	1.9	9,175	4.10%
Asian or Pacific Islander, Non-Hispanic	5512	2.58	10459	4.66	16,617	7.42%
Native American, Non-Hispanic	739	0.35	1542	0.69	826	0.37%
National Origin						
Foreign-born	7554	3.53	13133	5.86	22,016	9.83%
LEP						
Limited English Proficiency	3621	1.69	5572	2.48	9,926	4.43%
Sex						
Male	103401	48.35	107341	47.86	107,474	47.99%
Female	110442	51.65	116926	52.14	116,489	52.01%
Age						
Under 18	53484	25.01	54422	24.27	46,994	20.98%
18-64	138427	64.73	140049	62.45	141,321	63.10%
65+	21931	10.26	29795	13.29	35,648	15.92%
Family Type						
Families with children	28303	48.68	22078	45.89	23,685	40.68%

Source: Decennial Census, 1990, 2000, 2010

Race

In Ramsey County, the majority of residents are white, Non-Hispanic (63.06%), followed by Asian Americans or Pacific Islanders, Non-Hispanic(18.66%), Black, Non-Hispanic (11.24%), Hispanic or Latino (7.43%), Two+ Races, Non-Hispanic (3.61%), Native Americans, Non-Hispanic (0.50%), and lastly Other, Non-Hispanic (0.17%). Between 1990 and 2010, there was a decrease in the population of white, Non-Hispanic citizens in Ramsey County. In 1990, the white, Non-Hispanic citizen percentage was 94.67%, however by 2010 that percentage declined to 80.88%. As this percentage decreased, the percentage of citizens of color in Ramsey County increased from 1.17% to 5.01% for Black, Non-Hispanics, 1.12% to 4.10% for Hispanics, 2.58% to 7.42% for Asian or Pacific Islander, Non-Hispanics, and 0.35% to 0.37% for Native American, Non-Hispanics.

National Origin
The ten most common national origins in Ramsey County are, from most populous to least populous, Laos, Thailand, Mexico, Burma, Ethiopia, Somalia, Vietnam, China (excluding Hong Kong and Taiwan), India, and Korea. There has been an increase of foreign-born individuals in Ramsey County, as percentages increased from 1990 (3.53%) to 2010 (9.83%).

LEP
The ten most commonly spoken first languages of individuals with Limited English Proficiency (LEP) in Ramsey County are, from most populous to least populous, Hmong, Spanish or Spanish Creole, Other Asian languages, African languages, Vietnamese, Chinese, Other Indic languages, Arabic, Mon-Khmer/Cambodian, and Russian. There has been an increase of individuals moving to Ramsey County with Limited English Proficiency, as percentages increased from 1990 (1.69%) to 2010 (4.43%).

Disability
Independent living difficulties (5.6%) and ambulatory difficulties (5.6%) have the highest rates of incidence in Ramsey County. After independent living and ambulatory difficulties, cognitive difficulties (5.4%) was the most common, followed by hearing difficulties (3.2%), self-care difficulties (2.5%) and vision difficulties (1.8%).

Sex
In Ramsey County, 48.67% of residents are male, while 51.33% are female. There has been a consistent, though slight, majority of female residents in Ramsey County over time.

Age
Working age adults are the clear majority (63.29%), followed by minors under 18 (23.34%) and seniors (13.37%).

Families with Children
In Ramsey County, there are 57,343 families with children, making up 27.50% percent of the population. There has been a decreasing rate of families with children in Ramsey County over time. The percentage in 1990 (48.68%) decreased in 2000 (45.89%), and decreased again in 2010 (40.68%).

Table 11.1: Demographics, St. Paul

	St. Paul		Minneapolis-St. Paul-Bloomington, MN-WI Metro Area	
Race/Ethnicity	**#**	**%**	**#**	**%**
White, Non-Hispanic	156,681	52.08%	2,697,773	76.51%
Black, Non-Hispanic	46,559	15.48%	278,802	7.91%
Hispanic	29,207	9.71%	201,417	5.71%
Asian/Pacific Is., Non-Hispanic	75,766	25.19%	225248	6.39%
Native American, Non-Hisp.	1,933	0.64%	16,974	0.48%
Two+ Races, Non-Hispanic	12,011	3.99%	99,725	2.83%
Other, Non-Hispanic	481	0.16%	6,210	0.18%

#1 country of origin	Thailand	9,037	15.41%	Mexico	48,649	13.28%
#2 country of origin	Laos	9,028	15.40%	India	26,441	7.22%
#3 country of origin	Mexico	6,531	11.14%	Somalia	23,554	6.43%
#4 country of origin	Burma	5,194	8.86%	Laos	23,080	6.30%
#5 country of origin	Ethiopia	3,961	6.75%	Ethiopia	17,546	4.79%
#6 country of origin	Somalia	3,288	5.61%	Vietnam	16,411	4.48%
#7 country of origin	Vietnam	1,874	3.20%	Thailand	16,235	4.43%
#8 country of origin	China, excluding Hong Kong and Taiwan	1,560	2.66%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	El Salvador	1,517	2.59%	Liberia	11,449	3.13%
#10 country of origin	India	996	1.70%	Korea	11,236	3.07%
#1 LEP Language	Hmong	12,902	4.74%	Spanish or Spanish Creole	63,539	1.97%
#2 LEP Language	Spanish or Spanish Creole	9,173	3.37%	African Languages	27,394	0.85%
#3 LEP Language	Other Asian languages	5,601	2.06%	Hmong	24,721	0.77%
#4 LEP Language	African languages	5,040	1.85%	Vietnamese	12,074	0.37%
#5 LEP Language	Vietnamese	1,399	0.51%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Chinese	634	0.23%	Chinese	8,973	0.28%
#7 LEP Language	Arabic	505	0.19%	Russian	6,435	0.20%
#8 LEP Language	Russian	388	0.14%	Laotian	3,849	0.12%
#9 LEP Language	Mon-Khmer, Cambodian	344	0.13%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	French (incl. Patois, Cajun)	267	0.10%	Arabic	2,820	0.09%
Hearing difficulty		9,127	3.1%		105,329	3.0%
Vision difficulty		5,944	2.0%		49,528	1.4%
Cognitive difficulty		16,589	6.0%		138,788	4.2%
Ambulatory difficulty		15,452	5.6%		148,966	4.6%
Self-care difficulty		7,351	2.7%		65,395	2.0%
Independent living difficulty		12,800	5.8%		116,400	4.4%
Male		148,641	49.41%		1,745,774	49.51%
Female		152,179	50.59%		1,780,375	50.49%
Under 18		76,240	25.34%		846,375	24.0%
18-64		195,305	64.92%		2,231,257	63.3%
65+		29,275	9.73%		448,517	12.7%

Families with children	32,661	29.03%	409.814	30.23%

Source: American Community Survey Estimates, 2013-2017

Table 11.2: Demographic Trends, St. Paul

	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	**#**	**%**	**#**	**%**	**#**	**%**
White, Non-Hispanic	218697	80.33	183880	64.04	159,437	55.93%
Black, Non-Hispanic	19523	7.17	37051	12.9	49,191	17.26%
Hispanic	11430	4.2	22704	7.91	27,311	9.58%
Asian or Pacific Islander, Non-Hispanic	18625	6.84	38119	13.27	44,717	15.69%
Native American, Non-Hispanic	3319	1.22	4294	1.5	3,839	1.35%
National Origin						
Foreign-born	19894	7.31	41138	14.33	47,543	16.68%
LEP						
Limited English Proficiency	14551	5.35	31346	10.92	34,450	12.08%
Sex						
Male	128053	47.04	138420	48.21	139,355	48.88%
Female	144171	52.96	148723	51.79	145,713	51.12%
Age						
Under 18	66611	24.47	79883	27.82	71,608	25.12%
18-64	168082	61.74	177480	61.81	187,872	65.90%
65+	37531	13.79	29780	10.37	25,588	8.98%
Family Type						
Families with children	31555	49.88	27575	53.42	30,744	51.51%

Source: Decennial Census, 1990, 2000, 2010

Race

In St. Paul, the majority of residents are white, Non-Hispanic (52.08%), followed by Asian Americans or Pacific Islanders, Non-Hispanic(25.19%), Black, Non-Hispanic (15.48%), Hispanic or Latino (9.71%), Two+ Races, Non-Hispanic (3.99%), Native Americans, Non-Hispanic (0.64%), and lastly Other, Non-Hispanic (0.16%). Between 1990 and 2010, there was a large decrease in the population of white, Non-Hispanic citizens in St. Paul. In 1990, the white, Non-Hispanic citizen percentage was 80.33%, however by 2010 that percentage severely declined to 55.93%. As this percentage decreased, the percentage of citizens of color in St. Paul increased from 7.17% to 17.26% for Black, Non-Hispanics, 4.20% to 9.58% for Hispanics, 6.84% to 15.69% for Asian or Pacific Islander, Non-Hispanics, and 1.22% to 1.35% for Native American, Non-Hispanics.

National Origin

The ten most common national origins in St. Paul are, from most populous to least populous, Thailand, Laos, Mexico, Burma, Ethiopia, Somalia, Vietnam, China (excluding Hong Kong and

Taiwan), El Salvador, and India. There has been an increase of foreign-born individuals in St. Paul as percentages increased from 1990 (7.31%) to 2010 (16.68%).

LEP

The ten most commonly spoken first languages of individuals with Limited English Proficiency (LEP) in St. Paul are, from most populous to least populous, Hmong, Spanish or Spanish Creole, Other Asian languages, African languages, Vietnamese, Chinese, Arabic, Russian, Mon-Khmer/Cambodian, French (including Patios, Cajun). There has been a steady increase of individuals with Limited English Proficiency, as percentages increased from 1990 (5.35%) to 2010 (12.08%).

Disability

Cognitive difficulties (6.0%) have the highest rates of incidence in St. Paul. After cognitive difficulties, Independent living difficulties (5.8%) was the most common, followed by ambulatory difficulties (5.6%), hearing difficulties (3.1%), self-care difficulties (2.7%) and vision difficulties (2.0%).

Sex

In St. Paul, 49.41% of residents are male, while 50.59% are female. There has been a consistent majority of female residents in St. Paul over time.

Age

In St. Paul, working age adults as the clear majority (64.92%), followed by minors under 18 (25.34%) and seniors (9.37%).

Families with Children

In St. Paul, there are 32, 661 families with children, making up 29.03% percent of the population. There has been a fluctuating rate of families with children in St. Paul over time. The percentage in 1990 (49.88%) increased in 2000 (53.42%), and decreased again in 2010 (51.51%).

Table 12.1: Demographics, Washington County

	Washington County			Minneapolis-St. Paul-Bloomington, MN-WI Metro Area		
Race/Ethnicity	**#**		**%**	**#**		**%**
White, Non-Hispanic	210,116		83.72%	2,697,773		76.51%
Black, Non-Hispanic	10,209		4.07%	278,802		7.91%
Hispanic	9,847		3.92%	201,417		5.71%
Asian/Pacific Is., Non-Hispanic	20,056		7.99%	225248		6.39%
Native American, Non-Hisp.	835		0.33%	16,974		0.48%
Two+ Races, Non-Hispanic	6,161		2.45%	99,725		2.83%
Other, Non-Hispanic	232		0.09%	6,210		0.18%
#1 country of origin	India	1,920	11.41%	Mexico	48,649	13.28%
#2 country of origin	Mexico	1,320	7.85%	India	26,441	7.22%
#3 country of origin	Laos	975	5.79%	Somalia	23,554	6.43%

#4 country of origin	China, excluding Hong Kong and Taiwan	962	5.72%	Laos	23,080	6.30%
#5 country of origin	Korea	852	5.06%	Ethiopia	17,546	4.79%
#6 country of origin	Vietnam	728	4.33%	Vietnam	16,411	4.48%
#7 country of origin	Canada	675	4.01%	Thailand	16,235	4.43%
#8 country of origin	Ethiopia	634	3.77%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	Thailand	554	3.29%	Liberia	11,449	3.13%
#10 country of origin	Somalia	448	2.66%	Korea	11,236	3.07%
#1 LEP Language	Spanish or Spanish Creole	1,964	0.85%	Spanish or Spanish Creole	63,539	1.97%
#2 LEP Language	Hmong	980	0.42%	African Languages	27,394	0.85%
#3 LEP Language	Chinese	568	0.25%	Hmong	24,721	0.77%
#4 LEP Language	Vietnamese	527	0.23%	Vietnamese	12,074	0.37%
#5 LEP Language	African languages	505	0.22%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Arabic	199	0.09%	Chinese	8,973	0.28%
#7 LEP Language	Tagalog	178	0.08%	Russian	6,435	0.20%
#8 LEP Language	Korean	158	0.07%	Laotian	3,849	0.12%
#9 LEP Language	Mon-Khmer, Cambodian	144	0.06%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	Russian	136	0.06%	Arabic	2,820	0.09%
Hearing difficulty		7,297	2.9%		105,329	3.0%
Vision difficulty		2,761	1.1%		49,528	1.4%
Cognitive difficulty		8,882	3.8%		138,788	4.2%
Ambulatory difficulty		8,696	3.7%		148,966	4.6%
Self-care difficulty		3,889	1.7%		65,395	2.0%
Independent living difficulty		6,918	3.7%		116,400	4.4%
Male		124,207	49.49%		1,745,774	49.51%
Female		126,772	50.51%		1,780,375	50.49%
Under 18		62,834	25.04%		846,375	24.0%
18-64		154,842	61.70%		2,231,257	63.3%
65+		33,303	13.27%		448,517	12.7%
Families with children		31,312	34.03%		409.814	30.23%

Source: American Community Survey Estimates, 2013-2017

Table 12.2: Demographic Trends, Washington County

	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	**#**	**%**	**#**	**%**	**#**	**%**

White, Non-Hispanic	120019	96.42	143382	93.64	153,607	87.98%
Black, Non-Hispanic	1221	0.98	3043	1.99	6,207	3.56%
Hispanic	1517	1.22	2862	1.87	5,771	3.31%
Asian or Pacific Islander, Non-Hispanic	979	0.79	2443	1.6	7,337	4.20%
Native American, Non-Hispanic	551	0.44	1118	0.73	1,502	0.86%
National Origin						
Foreign-born	1957	1.57	3739	2.44	8,237	4.72%
LEP						
Limited English Proficiency	1395	1.12	2051	1.34	4,058	2.32%
Sex						
Male	62730	50.4	76737	50.12	87,146	49.91%
Female	61730	49.6	76375	49.88	87,452	50.09%
Age						
Under 18	37706	30.3	45653	29.82	44,911	25.72%
18-64	78325	62.93	95260	62.22	110,099	63.06%
65+	8429	6.77	12199	7.97	19,589	11.22%
Family Type						
Families with children	18869	56.36	15105	53.33	22,091	46.71%

Source: Decennial Census, 1990, 2000, 2010

Race

In Washington County, the majority of residents are white, Non-Hispanic (83.72%), followed by Asian Americans or Pacific Islanders, Non-Hispanic (7.99%), Black, Non-Hispanic (4.07%), Hispanic or Latino (3.92%), Two+ Races, Non-Hispanic (2.45%), Native Americans, Non-Hispanic (0.33%), and lastly Other, Non-Hispanic (0.09%). Between 1990 and 2010, there was a large trending decrease in the population of white, Non-Hispanic citizens in Washington County. In 1990, the white, Non-Hispanic citizen percentage was 96.42%, however by 2010 that percentage declined to 87.98%. As this percentage decreased, the percentage of citizens of color in Washington County increased from 0.98% to 3.56% for Black, Non-Hispanics, 1.22% to 3.31% for Hispanics, 0.79% to 4.20% for Asian or Pacific Islander, Non-Hispanics, and 0.44% to 0.86% for Native American, Non-Hispanics.

National Origin

The ten most common national origins in Washington County are, from most populous to least populous, India, Mexico, Laos, China (excluding Hong Kong and Taiwan), Korea, Vietnam, Canada, Ethiopia, Thailand, Somalia. There has been an increase of foreign-born individuals in Washington County, as percentages increased from 1990 (1.57%) to 2010 (4.72%).

LEP

The ten most commonly spoken first languages of individuals with Limited English Proficiency (LEP) in Washington County are, from most populous to least populous, Spanish or Spanish Creole, Hmong, Chinese, Vietnamese, African languages, Arabic, Tagalog, Korean, Mon-

Khmer/Cambodian, Russian. There has been a very slight increase of individuals in Washington County with Limited English Proficiency, as percentages increased from 1990 (1.12%) to 2010 (2.32%).

Disability
Cognitive difficulties (3.8%) have the highest rates of incidence in Washington County. After cognitive difficulties, Independent living difficulties (3.7%) and ambulatory difficulties (3.7%) were the most common, followed by hearing difficulties (2.9%), self-care difficulties (1.7%) and vision difficulties (1.1%).

Sex
In Washington County, 49.49% of residents are male, while 50.51% are female. There has been a change in trend in Washington County over time, as percentages shifted from 1990 (males 50.40%, females 49.60%) to 2010 (males 49.91%, females 50.09%).

Age
Working age adults are the clear majority (61.70%), followed by minors under 18 (25.04%) and seniors (13.27%).

Families with Children
In Washington County, there are 31,312 families with children, making up 34.03% percent of the population. There has been a decreasing rate of families with children in Washington County over time. The percentage in 1990 (56.36%) decreased in 2000 (53.33%), and decreased again in 2010 (46.71%).

Table 13.1: Demographics, Woodbury

	Woodbury			Minneapolis-St. Paul-Bloomington, MN-WI Metro Area		
Race/Ethnicity	**#**		**%**	**#**		**%**
White, Non-Hispanic	51,546		76.20%	2,697,773		76.51%
Black, Non-Hispanic	3,918		5.79%	278,802		7.91%
Hispanic	3,403		5.03%	201,417		5.71%
Asian/Pacific Is., Non-Hispanic	7,321		10.82%	225248		6.39%
Native American, Non-Hisp.	99		0.15%	16,974		0.48%
Two+ Races, Non-Hispanic	2,088		3.09%	99,725		2.83%
Other, Non-Hispanic	150		0.22%	6,210		0.18%
#1 country of origin	India	1,766	21.26%	Mexico	48,649	13.28%
#2 country of origin	China, excluding Hong Kong and Taiwan	803	9.67%	India	26,441	7.22%
#3 country of origin	Mexico	503	6.06%	Somalia	23,554	6.43%
#4 country of origin	Ethiopia	428	5.15%	Laos	23,080	6.30%
#5 country of origin	Canada	380	4.57%	Ethiopia	17,546	4.79%
#6 country of origin	Korea	345	4.15%	Vietnam	16,411	4.48%
#7 country of origin	Somalia	332	4.00%	Thailand	16,235	4.43%

#8 country of origin	Vietnam	276	3.32%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	Philippines	226	2.72%	Liberia	11,449	3.13%
#10 country of origin	Pakistan	181	2.18%	Korea	11,236	3.07%
#1 LEP Language	Spanish or Spanish Creole	586	0.96%	Spanish or Spanish Creole	63,539	1.97%
#2 LEP Language	Chinese	471	0.77%	African Languages	27,394	0.85%
#3 LEP Language	African languages	289	0.47%	Hmong	24,721	0.77%
#4 LEP Language	Vietnamese	206	0.34%	Vietnamese	12,074	0.37%
#5 LEP Language	Tagalog	136	0.22%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Korean	129	0.21%	Chinese	8,973	0.28%
#7 LEP Language	French (incl. Patois, Cajun)	104	0.17%	Russian	6,435	0.20%
#8 LEP Language	Russian	82	0.13%	Laotian	3,849	0.12%
#9 LEP Language	Other Asian languages	73	0.12%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	Portuguese or Portuguese Creole	68	0.11%	Arabic	2,820	0.09%
Hearing difficulty		1,331	2.0%		105,329	3.0%
Vision difficulty		709	1.1%		49,528	1.4%
Cognitive difficulty		1,417	2.3%		138,788	4.2%
Ambulatory difficulty		1,860	3.0%		148,966	4.6%
Self-care difficulty		791	1.3%		65,395	2.0%
Independent living difficulty		1,314	2.7%		116,400	4.4%
Male		32,546	48.11%		1,745,774	49.51%
Female		35,102	51.89%		1,780,375	50.49%
Under 18		18,678	27.61%		846,375	24.0%
18-64		41,848	61.86%		2,231,257	63.3%
65+		7,122	10.53%		448,517	12.7%
Families with children		9,984	40.85%		409.814	30.23%

Source: American Community Survey Estimates, 2013-2017

Table 13.2: Demographic Trends, Woodbury

	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	**#**	**%**	**#**	**%**	**#**	**%**
White, Non-Hispanic	18729	93.31	41226	88.75	49,016	79.11%
Black, Non-Hispanic	296	1.47	1375	2.96	3,994	6.45%

Hispanic	340	1.69	993	2.14	2,329	3.76%
Asian or Pacific Islander, Non-Hispanic	612	3.05	2572	5.54	6,237	10.07%
Native American, Non-Hispanic	54	0.27	201	0.43	306	0.49%
National Origin						
Foreign-born	770	3.84	3075	6.62	5,957	9.61%
LEP						
Limited English Proficiency	357	1.78	1338	2.88	2,792	4.51%
Sex						
Male	9701	48.35	22540	48.52	29,877	48.22%
Female	10365	51.65	23913	51.48	32,084	51.78%
Age						
Under 18	6224	31.02	14511	31.24	18,318	29.56%
18-64	12884	64.21	29160	62.77	38,479	62.10%
65+	957	4.77	2782	5.99	5,164	8.33%
Family Type						
Families with children	3272	59.22	6982	57.98	9,242	55.38%

Source: Decennial Census, 1990, 2000, 2010

Race

Woodbury is a predominantly white, Non-Hispanic City at 76.20%, followed by Asian/Pacific Islander residents at 10.82%, Black residents at 5.79%, Hispanic residents at 5.03%, and Native American residents at 0.15%. The City has a slightly higher Asian or Pacific Islander population than the Region, and has experienced a large increase in Asian or Pacific Islander residents since 1990.

National Origin

In order, the most common places of birth for the foreign-born population are India (21.26%), China, excluding Hong Kong and Taiwan (9.67%), Mexico (6.06%, Ethiopia (5.15%), Canada (4.57%), Korea (4.15%), Somalia (4.00%), Vietnam (3.32%), Philippines (2.72%) and Pakistan (2.18%). The foreign-born population has increased steadily since 1990.

LEP

The most common languages for the limited English proficient population of Woodbury are Spanish or Spanish Creole, Chinese, African languages, Vietnamese, Tagalog, Korean, French (incl. Patois, Cajun), Russian, Other Asian Languages, and Portuguese or Portuguese Creole. The LEP population has increased steadily since 1990.

Disability

2.0% of residents experience hearing difficulty, 1.1% vision difficulty, 2.3% cognitive difficulty, 3.0% ambulatory difficulty, 1.3% self-care difficulty, and 2.7% independent living difficulty.

Sex
48.11% of the population is male, 51.89% of the population is female.

Age
Most of the population is aged 18-64 (61.86%), followed by under 18 at 27.16% and 65 and over at 10.53%

Families with Children
40.85% of households are families with children.

Table 14.1: Demographics, Scott County

	Scott County			Minneapolis-St. Paul-Bloomington, MN-WI Metro Area		
Race/Ethnicity	**#**		**%**	**#**		**%**
White, Non-Hispanic		116,432	82.31%		2,697,773	76.51%
Black, Non-Hispanic		4,772	3.37%		278,802	7.91%
Hispanic		6,951	4.91%		201,417	5.71%
Asian/Pacific Is., Non-Hispanic		11,723	8.29%		225248	6.39%
Native American, Non-Hisp.		1,076	0.76%		16,974	0.48%
Two+ Races, Non-Hispanic		3,480	2.46%		99,725	2.83%
Other, Non-Hispanic		252	0.18%		6,210	0.18%
#1 country of origin	Mexico	1,612	13.51%	Mexico	48,649	13.28%
#2 country of origin	Cambodia	1,137	9.53%	India	26,441	7.22%
#3 country of origin	Vietnam	989	8.29%	Somalia	23,554	6.43%
#4 country of origin	India	755	6.33%	Laos	23,080	6.30%
#5 country of origin	Somalia	533	4.47%	Ethiopia	17,546	4.79%
#6 country of origin	Laos	479	4.02%	Vietnam	16,411	4.48%
#7 country of origin	Kenya	474	3.97%	Thailand	16,235	4.43%
#8 country of origin	Russia	433	3.63%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	Korea	431	3.61%	Liberia	11,449	3.13%
#10 country of origin	China, excluding Hong Kong and Taiwan	360	3.02%	Korea	11,236	3.07%
#1 LEP Language	Spanish or Spanish Creole	1,661	1.31%	Spanish or Spanish Creole	63,539	1.97%
#2 LEP Language	Mon-Khmer, Cambodian	791	0.62%	African Languages	27,394	0.85%
#3 LEP Language	Vietnamese	788	0.62%	Hmong	24,721	0.77%
#4 LEP Language	Russian	569	0.45%	Vietnamese	12,074	0.37%
#5 LEP Language	Chinese	332	0.26%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Laotian	318	0.25%	Chinese	8,973	0.28%

#7 LEP Language	African languages	203	0.16%	Russian	6,435	0.20%
#8 LEP Language	Other Asian languages	90	0.07%	Laotian	3,849	0.12%
#9 LEP Language	Other Indo-European languages	90	0.07%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	German	89	0.07%	Arabic	2,820	0.09%
Hearing difficulty		3,541	2.5%		105,329	3.0%
Vision difficulty		1,758	1.3%		49,528	1.4%
Cognitive difficulty		4,231	3.3%		138,788	4.2%
Ambulatory difficulty		4,242	3.3%		148,966	4.6%
Self-care difficulty		2,069	1.6%		65,395	2.0%
Independent living difficulty		3,219	3.2%		116,400	4.4%
Male		70,509	49.84%		1,745,774	49.51%
Female		70,954	50.16%		1,780,375	50.49%
Under 18		40,262	28.46%		846,375	24.0%
18-64		87,634	61.95%		2,231,257	63.3%
65+		13,567	9.59%		448,517	12.7%
Families with children		19,238	40.19%		409.814	30.23%

Source: American Community Survey Estimates, 2013-2017

Race

In Scott County, 82.31% of residents are white, non-Hispanic, 3.37% are Black, 4.91% are Hispanic, 8.29% are Asian or Pacific Islander, 0.76% are Native American, 2.46% are two or more races, and 0.18% are Other, non-Hispanic. The County contains a higher proportion of white and Asian or Pacific Islander residents than the Region, and less Black and Hispanic residents.

National Origin

13.51% of foreign-born residents are from Mexico. The following most common countries of origin are, in order, Cambodia at 9.53%, Vietnam at 8.29%, India at 6.33%, Somalia, Laos, Kenya, Russia, Korea, and China, excluding Hong Kong and Taiwan.

LEP

The most common spoken languages for the limited English proficiency population in order are Spanish or Spanish Creole, Mon-Khmer Cambodian, Vietnamese, Russian, Chinese, Laotian, African languages, Other Asian languages, Other Indo-European languages and German.

Disability

2.5% of residents experience hearing difficulty, 1.3% experience vision difficulty, 3.3% cognitive difficulty, 3.3% ambulatory difficulty, 1.6% self-care difficulty, and 3.2% independent living difficulty.

Sex
49.84% of the population is male and 50.16% is female.

Age
61.95% of residents are ages 18-64, followed by 28.46% under 18, and 9.59% 65 and over. There is a slightly lower population of residents 65+ in the County than in the Region.

Families with Children
40.19% of households are families with children.

Table 15.1: Demographics, Carver County

	Carver County			Minneapolis-St. Paul-Bloomington, MN-WI Metro Area		
Race/Ethnicity	**#**		**%**	**#**		**%**
White, Non-Hispanic		88,561	89.64%		2,697,773	76.51%
Black, Non-Hispanic		1,449	1.47%		278,802	7.91%
Hispanic		4,051	4.10%		201,417	5.71%
Asian/Pacific Is., Non-Hispanic		5,500	5.57%		225248	6.39%
Native American, Non-Hisp.		196	0.20%		16,974	0.48%
Two+ Races, Non-Hispanic		2,020	2.04%		99,725	2.83%
Other, Non-Hispanic		61	0.06%		6,210	0.18%
#1 country of origin	Mexico	638	13.57%	Mexico	48,649	13.28%
#2 country of origin	India	525	11.17%	India	26,441	7.22%
#3 country of origin	Colombia	220	4.68%	Somalia	23,554	6.43%
#4 country of origin	Canada	217	4.62%	Laos	23,080	6.30%
#5 country of origin	Vietnam	215	4.57%	Ethiopia	17,546	4.79%
#6 country of origin	China, excluding Hong Kong and Taiwan	207	4.40%	Vietnam	16,411	4.48%
#7 country of origin	Philippines	205	4.36%	Thailand	16,235	4.43%
#8 country of origin	Kenya	200	4.25%	China, excluding Hong Kong and Taiwan	13,932	3.80%
#9 country of origin	Korea	199	4.23%	Liberia	11,449	3.13%
#10 country of origin	Honduras	146	3.11%	Korea	11,236	3.07%
#1 LEP Language	Spanish or Spanish Creole	1,356	1.52%	Spanish or Spanish Creole	63,539	1.97%
#2 LEP Language	Vietnamese	281	0.31%	African Languages	27,394	0.85%
#3 LEP Language	Laotian	160	0.18%	Hmong	24,721	0.77%
#4 LEP Language	Russian	90	0.10%	Vietnamese	12,074	0.37%
#5 LEP Language	Mon-Khmer, Cambodian	57	0.06%	Other Asian Languages	10,252	0.32%
#6 LEP Language	Chinese	56	0.06%	Chinese	8,973	0.28%
#7 LEP Language	German	55	0.06%	Russian	6,435	0.20%

#8 LEP Language	Urdu	42	0.05%	Laotian	3,849	0.12%
#9 LEP Language	African languages	38	0.04%	Mon-Khmer, Cambodian	3,042	0.09%
#10 LEP Language	French (incl. Patois, Cajun)	36	0.04%	Arabic	2,820	0.09%
Hearing difficulty		2,280	2.3%		105,329	3.0%
Vision difficulty		865	0.9%		49,528	1.4%
Cognitive difficulty		2,326	2.5%		138,788	4.2%
Ambulatory difficulty		2,792	3.0%		148,966	4.6%
Self-care difficulty		1,258	1.4%		65,395	2.0%
Independent living difficulty		2,186	3.1%		116,400	4.4%
Male		49,086	49.68%		1,745,774	49.51%
Female		49,713	50.32%		1,780,375	50.49%
Under 18		27,243	27.57%		846,375	24.0%
18-64		61,254	62.00%		2,231,257	63.3%
65+		10,302	10.43%		448,517	12.7%
Families with children		13,691	38.74%	409.814		30.23%

Source: American Community Survey Estimates, 2013-2017

Race

Carver County is predominantly white, even more so than the Region. 89.64% of residents are white, non-Hispanic, 1.47% are Black, 4.10% are Hispanic, 5.57% are Asian or Pacific Islander, 0.20% are Native American, 2.04% are two or more races, and 0.06% are other, non-Hispanic. The County has an especially low Black population compared to the Region.

National Origin

The most common countries of origin for the foreign-born population in order are Mexico at 13.57%, India at 11.17%, Colombia, Canada, Vietnam, China, excluding Hong Kong and Taiwan, Philippines, Kenya, Korea and Honduras.

LEP

The most common spoken language for the limited English proficiency population is Spanish or Spanish Creole at 1.52%. The remaining most common spoken languages in order are Vietnamese, Laotian, Russian, Mon-Khmer Cambodian, Chinese, German, Urdu, African languages, and French (incl. Patois, Cajun).

Disability

2.3% of residents experience hearing difficulty, 0.9% vision difficulty, 2.5% cognitive difficulty, 3.0% ambulatory difficulty, 1.4% self-care difficulty, and 3.1% independent living difficulty. These figures are slightly lower than those of the Region.

Sex

49.68% of residents are male and 50.32% of residents are female.

Age
62.00% of residents are ages 18-64, 27.57% are under 18, and 10.43% are 65 and over.

Families with Children
38.74% of households are families with children.

Table 24: Demographic Trends, Region

	(Minneapolis-St. Paul-Bloomington, MN-WI) Region					
	1990 Trend		2000 Trend		2010 Trend	
Race/Ethnicity	#	%	#	%	#	%
White, Non-Hispanic	2,377,570	91.63%	2,573,536	84.88%	2,641,225	78.87%
Black, Non-Hispanic	87,794	3.38%	180,048	5.94%	277,419	8.28%
Hispanic	37,810	1.46%	101,011	3.33%	179,202	5.35%
Asian or Pacific Islander, Non-Hispanic	63,920	2.46%	137,339	4.53%	210,412	6.28%
Native American, Non-Hispanic	23,217	0.89%	31,446	1.04%	34,731	1.04%
National Origin						
Foreign-born	88,459	3.41%	211,435	6.97%	303,022	9.05%
LEP						
Limited English Proficiency	54,794	2.11%	128,664	4.24%	164,904	4.92%
Sex						
Male	1,268,537	48.90%	1,496,751	49.37%	1,653,645	49.38%
Female	1,325,816	51.10%	1,535,167	50.63%	1,695,214	50.62%
Age						
Under 18	685,784	26.43%	830,974	27.41%	837,362	25.00%
18-64	1,649,849	63.59%	1,907,051	62.90%	2,151,167	64.24%
65+	258,720	9.97%	293,893	9.69%	360,330	10.76%
Family Type						
Families with children	347,275	51.93%	317,188	51.88%	404,837	48.21%

Source: Decennial Census, 1990, 2000, 2010

The Region has experienced some major demographic changes since 1990. The most significant change has been in the racial/ethnic makeup of the Region over time. There have been dramatic increases in the Hispanic, Asian or Pacific Islander and Native American populations, which likely corresponds to the increases in the foreign-born and LEP populations in the Region.

The chart below displays the complete racial/ethnic makeup of all included jurisdictions.

Table 25: Race/Ethnicity, All Jurisdictions

	Total	White alone	Black or African American alone	American Indian and Alaska Native alone	Asian alone	Native Hawaiian and Other Pacific Islander alone	Some other race alone	Two or more races	Hispanic or Latino
Anoka County, Minnesota	344,861	285,056	18,860	1,852	14,627	116	426	9,327	14,597
Coon Rapids city, Minnesota	62,342	51,722	3,698	159	2,486	33	49	1,773	2,422
Carver County, Minnesota	98,799	88,561	1,449	196	2,444	17	61	2,020	4,051
Dakota County, Minnesota	414,655	330,377	23,183	858	19,549	163	972	11,533	28,020
Hennepin County, Minnesota	1,224,763	851,532	153,651	6,507	85,242	398	2,920	40,454	84,059
Bloomington city, Minnesota	85,417	61,970	7,848	205	4,807	9	303	2,791	7,484
Eden Prairie city, Minnesota	63,660	48,783	3,821	149	6,393	107	52	1,540	2,815
Minneapolis city, Minnesota	411,452	246,351	76,499	4,293	24,784	73	964	18,341	40,147
Minnetonka city, Minnesota	52,102	44,863	2,218	69	2,383	9	77	1,301	1,182
Plymouth city, Minnesota	76,258	59,582	4,283	231	6,875	0	54	1,857	3,376
Ramsey County, Minnesota	537,893	339,170	60,445	2,699	75,177	136	922	19,396	39,948
St. Paul city, Minnesota	300,820	156,681	46,559	1,933	53,890	58	481	12,011	29,207
Scott County, Minnesota	141,463	116,432	4,772	1,076	8,490	10	252	3,480	6,951
Washington County, Minnesota	250,979	210,116	10,209	835	13,440	139	232	6,161	9,847
Woodbury city, Minnesota	67,648	51,546	3,918	99	6,328	116	150	2,088	3,403

B. General Issues

i. **Segregation/Integration**

The analysis in this section uses several metrics to determine levels of segregation in each jurisdiction. The Dissimilarity Index and the Isolation and Exposure Indices are both tools used by social scientists to assign values to segregation and concentrations of minority groups. In addition to these metrics, this section also includes an analysis of maps for each jurisdiction that highlight residential living patterns of residents by race, national origin, and limited English proficiency.

1. Analysis

    a. *Describe and compare segregation levels in the jurisdiction and region. Identify the racial/ethnic groups that experience the highest levels of segregation.*

Dissimilarity Index

	Value	Level of Segregation
Dissimilarity Index Value (0-100)	0-40	Low Segregation
	41-54	Moderate Segregation
	55-100	High Segregation

The tables below reflect the Dissimilarity Indices for each jurisdiction. The Dissimilarity Index measures the percentage of a certain group's population that would have to move to a different census tract in order to be evenly distributed within a city or metropolitan area in relation to another group. The higher the Dissimilarity Index, the higher the extent of the segregation.

Table 1 Dissimilarity Index Values by Race and Ethnicity for Region

Racial/Ethnic Dissimilarity Index	Current
Non-White/White	38.88
Black/White	52.03
Hispanic/White	43.74
Asian or Pacific Islander/White	44.21

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

While trend data for the entire region encompassed in this analysis was unavailable, the current data for the region indicates moderate levels of segregation across the region. Though the overall Non-White/White index value is technically under the threshold for moderate segregation, the index values for all other minority groups compared to white residents indicate higher levels of segregation. Black residents appear to be the most segregated, as over half of Black residents in

the region would have to a different census tract to be evenly distributed in relation to white residents. In addition, roughly 44% of Hispanic/Latino and Asian/Pacific Islander residents would also have to move to a different census tract to be evenly distributed in relation to white residents.

Table 2 Dissimilarity Index Values by Race and Ethnicity for Anoka County

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	15.36	23.22	26.47	29.24
Black/White	33.18	36.56	36.66	45.38
Hispanic/White	17.08	22.81	30.92	37.40
Asian or Pacific Islander/White	23.33	24.54	25.89	32.56

Source: Based on American Community Survey Estimates, 2013-2017; Brown Longitudinal Tract Database See Data Documentation for more information.

Dissimilarity index values indicate significantly increasing levels of segregation in Anoka County over the last 30 years. Though the overall Non-White/White index value remains in the category of low segregation, this number has nearly doubled since 1990, as has the index value for Hispanic/White segregation. As a suburban/rural and mostly white County, these numbers could be a result of more recent increases in these minority populations. The Asian/White index value has increased less drastically, though it as still increased 10 points since 1990. The Black/White Dissimilarity Index remained steady from 1990 to 2010, but the current figure crosses the threshold from low segregation to moderate segregation. This indicates that of the minority groups in Anoka County, Black residents are the most segregated residentially from white residents, as over 45% of them would have to move from their current census tract in order to be distributed evenly throughout the County.

Table 3 Dissimilarity Index Values by Race and Ethnicity for Coon Rapids

Racial/Ethnic Dissimilarity Index	Current
Non-White/White	15.38
Black/White	26.86
Hispanic/White	29.06
Asian or Pacific Islander/White	19.11

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

While trend data was not available for the city of Coon Rapids, the current Dissimilarity Index values indicate low levels of segregation for all racial groups. The overall white/non-white index values reflect that white and non-white residents are fairly integrated within the city. Black and Hispanic/Latino residents have the highest Dissimilarity Index Values in the city, indicating that just under 30% of these residents would need to move to be evenly distributed in relation to whites.

Table 4 Dissimilarity Index Values by Race and Ethnicity for Dakota County

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	18.63	22.09	24.78	27.33
Black/White	33.73	31.44	32.89	42.38
Hispanic/White	25.85	32.09	34.64	38.52
Asian or Pacific Islander/White	24.81	26.38	23.92	28.86

Source: Based on American Community Survey Estimates, 2013-2017; Brown Longitudinal Tract Database See Data Documentation for more information.

Over the last 30 years, the overall levels of nonwhite/white segregation in Dakota County have steadily increased about by roughly 10 points, though the levels still indicate low segregation County-wide. Similarly, Black/White segregation has increased by roughly 10 points over the same time period. These levels of segregation were already higher, and currently Black/White segregation dissimilarity index values indicate moderate levels of segregation. These values are the highest of any minority group relative to white residents, which shows that in Dakota County, Black residents are the most concentrated, and the largest percentage of Black residents would need to move to a different census tract in order to be evenly distributed compared to white residents. Despite Black residents having the highest levels of segregation, Hispanic/White segregation has increased the most since 1990. Though technically within the bounds of low segregation, this index value pushes right up against the threshold for moderate segregation. This may be explained by an increasing Hispanic/Latino population since 1990, which has increased from 1.44% to 6.76%. The Dissimilarity Index values indicate that those new residents were also increasingly concentrated by race as the population grew. Asian/white segregation has remained the steadiest over time, increasing by just four points. Despite the Asian population growing from 1.64% in 1990 to 12.35% currently, these Dissimilarity Index values indicate low Asian/white segregation from 1990 to present day.

Table 5 Dissimilarity Index Values by Race and Ethnicity for Hennepin County

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	25.45	37.43	39.44	40.84
Black/White	38.85	46.17	45.83	52.78
Hispanic/White	16.02	35.59	41.52	47.92
Asian or Pacific Islander/White	22.9	34.59	39.84	43.50

Source: Based on American Community Survey Estimates, 2013-2017; Brown Longitudinal Tract Database See Data Documentation for more information.

In Hennepin County, levels of non-white/white segregation have increased significantly since 1990, from low to moderate segregation. Black/white segregation has been the highest since 1990, and has increased nearly 15 points in that time. The current index value for Black/white segregation for Hennepin County (52.79) is just on the cusp of the index value required to be classified as high

segregation (55). These levels of segregation continued to increase, and remain at their highest levels as the Black population has increased dramatically from just 2% to 12.55%. The Hispanic/White Dissimilarity Index value has increased by over 30 points, despite the Hispanic population increasing by less than 5 points. The Asian/White Dissimilarity Index has nearly doubled, coupled with a dramatic increase in the Asian population since 1990, a jump of roughly 17 percentage points. Despite the size of Hennepin County, these high Dissimilarity Index values indicate that a nearly half of the population of each minority group would have to move to be evenly distributed throughout the County in relation to white residents.

Table 6 Dissimilarity Index Values by Race and Ethnicity for Bloomington

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	13.25	23.32	28.23	26.94
Black/White	20.56	25.88	31.08	36.57
Hispanic/White	15.36	35.85	38.25	40.11
Asian or Pacific Islander/White	14.35	17.05	16.31	24.14

Source: Based on American Community Survey Estimates, 2013-2017; Brown Longitudinal Tract Database See Data Documentation for more information.

Though the Dissimilarity Index values for the city of Bloomington indicate low segregation, the City's segregation levels have nearly doubled across the board since 1990. In the same timeframe, the City's white population decreased by nearly 20 points. The most dramatic change in segregation levels occurred in relation to Hispanic/White segregation. In 1990, just 15% of the Hispanic Population would have to move to a different census tract in order to be evenly distributed in relation to white residents. Today, that number is 40%, just one percentage point shy of the threshold for moderate segregation. Black residents have similarly high levels of segregation in relation to white residents, though this number was initially the highest of all racial groups in 1990 (15.36), and has increased less drastically to the current level of 36.57. Black/white segregation levels are similarly categorized as low segregation but up against the threshold for moderate segregation. Asian residents in Bloomington maintain the lowest levels of segregation, indicating that they are more evenly distributed throughout the City.

Table 7 Dissimilarity Index Values by Race and Ethnicity for Eden Prairie

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	4.45	17.76	19.14	24.27
Black/White	13.75	32.5	33.67	42.19
Hispanic/White	11.73	24.23	20.19	42.87
Asian or Pacific Islander/White	6.72	11.18	24.04	32.29

Source: Based on American Community Survey Estimates, 2013-2017; Brown Longitudinal Tract Database See Data Documentation for more information.

Since 1990, the white population in Eden Prairie decreased from over 95% to 76.63% currently. In the same time period, segregation levels in the city increased astronomically. The overall non-white/white Dissimilarity Index value, despite still indicating low segregation, has increased by 20 percentage points over time. These numbers are similarly staggering for individual racial groups. In 1990, just 13% of Black residents and 11% of Hispanic/Latino residents in Eden Prairie would have had to move to a different census tract to be evenly distributed in relation to white residents. Currently, roughly 42% of both races would have to move. Asian/white segregation has also increased dramatically since 1990, where just 6.72% of the Asian population would have to move to be evenly distributed. Currently, over 32% of Asian residents would have to move to a different census tract. These Dissimilarity Index values indicate that as populations of minority groups in Eden Prairie grew in size, the levels of segregation increased, as these residents became concentrated in areas of either their own racial group or other minority groups.

Table 8 Dissimilarity Index Values by Race and Ethnicity for Minneapolis

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	46.54	47.6	44.04	43.40
Black/White	53.78	53.74	50.92	53.73
Hispanic/White	27.95	48.15	48.81	49.92
Asian or Pacific Islander/White	47.18	44.73	38.28	47.67

Source: Based on American Community Survey Estimates, 2013-2017; Brown Longitudinal Tract Database See Data Documentation for more information.

While Minneapolis' demographic changes and current levels of segregation are similar to the other larger, more diverse counties in the Region and the Region overall, the difference is that these levels have been relatively consistent over the last 30 years. Minneapolis Dissimilarity Index values for overall non-white/white segregation have remained at moderate levels since 1990, with a fluctuation of only roughly 3 percentage points throughout that time. Black residents have been the most segregated since 1990 as with Index values consistently over 50 and currently just one point shy of Index values indicating high segregation. Asian/white segregation has similarly stayed consistent since 1990. Despite a slight dip in 2010, Asian residents remain moderately segregated in the City. The most dramatic shifts in segregation levels have occurred regarding the concentrations of Hispanic residents in relation to white residents. While both Black and Asian residents were already moderately segregated in 1990, Hispanic/white segregation levels were roughly 20 points lower. Currently, Hispanic/white segregation is higher than Asian/white and overall white/nonwhite segregation in Minneapolis. The Hispanic population in Minneapolis grew just 7% since 1990, yet in the same timeframe, segregation levels nearly doubled.

Table 9 Dissimilarity Index Values by Race and Ethnicity for Minnetonka

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	11.2	14.76	23.82	27.38
Black/White	21.98	26.16	36.55	44.16

Hispanic/White	16.16	13.68	18.85	21.84
Asian or Pacific Islander/White	7.16	13.19	18.54	36.15

Source: Based on American Community Survey Estimates, 2013-2017; Brown Longitudinal Tract Database See Data Documentation for more information.

Minnetonka is a heavily white and fairly affluent suburb in Hennepin County. In 1990, the city had significantly lower levels of segregation both overall and across all racial groups. This is likely due to the fact that the City was 96% white. Overall segregation has nearly doubled The least amount of Asian residents would have needed to move in order to be evenly distributed, that number is near the high end of the threshold for low segregation currently. Black residents remain the most segregated in Minnetonka. In 1990, roughly 22% of Black residents would have needed to move to a different census tract in order to be evenly distributed throughout the city. Currently, that number is nearly 45%, making Black/White segregation the only Dissimilarity Index value to reach the threshold for moderate segregation in Minnetonka. Hispanic/white segregation is lower than the overall nonwhite/white segregation as well as lower than all other racial groups. This may be due to the fact that the Hispanic population remains very small in the city.

Table 10 Dissimilarity Index Values by Race and Ethnicity for Plymouth

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	11.44	10.79	18.16	21.47
Black/White	24.06	23.7	24.2	28.24
Hispanic/White	12.92	12.07	16.41	22.00
Asian or Pacific Islander/White	12.59	12.23	25.64	34.87

Source: Based on American Community Survey Estimates, 2013-2017; Brown Longitudinal Tract Database See Data Documentation for more information.

The city of Plymouth has low levels of segregation both overall and with regard to every racial group. Though overall nonwhite/white segregation has nearly doubled since 1990, this number started low and remains relatively low. Currently, just over 20% of the non-white population would need to move in order to be evenly distributed in relation to white residents. Interestingly, Asian residents, the largest minority group in the city, have the highest levels of segregation in Plymouth, where 34.97% of the Asian population would need to move to a different census tract in order to be evenly distributed in relation to white residents. Though the highest level, this is still a stark increase from 1990 levels of segregation, where just 12% of Asian residents would have needed to move. Black residents have the next highest level of segregation, but it has remained within four percentage points since 1990. Currently, roughly 30% of the Black population would need to move census tracts in order to be evenly distributed. The Hispanic/white Dissimilarity Index values have nearly doubled since 1990, though the current levels still remain low.

Table 11 Dissimilarity Index Values by Race and Ethnicity for Ramsey County

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	20.09	18.69	22	43.13
Black/White	32.52	30.13	29.23	48.19
Hispanic/White	17.3	17.58	24.73	44.81
Asian or Pacific Islander/White	27.97	21.09	21.29	52.19

Source: Based on American Community Survey Estimates, 2013-2017; Brown Longitudinal Tract Database See Data Documentation for more information.

Ramsey County has the highest overall nonwhite/white segregation levels in the region, and these levels are higher than the region overall. Since 1990, the white population in the County has dropped by roughly 15%, and in that time segregation levels have more than doubled. Currently, nearly 45% of nonwhite residents would need to move to a different census tract in order to be evenly distributed in relation to white residents. This Dissimilarity Index value indicates moderate levels of segregation. Hispanic/white segregation levels are also moderate, though these levels have more than doubled since 1990. Nearly 45% of Hispanic residents would need to move in order to be evenly distributed in Ramsey County. Black and Asian residents have the highest levels of segregation in the County. Black residents had the highest rates of segregation in 1990, 2000, and 2010. Currently, 48% of Black residents in the county would have to move to be evenly distributed in relation to whites. Asian residents are the largest minority group in the county, making up nearly 20% of the population. Asian/white segregation levels are just two points shy of the threshold for high segregation, as over 52% of Asian residents would have to move to a different census tract in order to be evenly distributed in relation to white County residents.

Table 12 Dissimilarity Index Values by Race and Ethnicity for St. Paul

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	43.17	42.1	44.18	44.83
Black/White	51.08	42.38	43.44	46.72
Hispanic/White	38.88	44.18	44.13	45.99
Asian or Pacific Islander/White	51.75	50.76	52.64	57.17

Source: Based on American Community Survey Estimates, 2013-2017; Brown Longitudinal Tract Database See Data Documentation for more information.

Despite being just 52.08% white, St. Paul has moderate levels of segregation across the board, and has for some time. With the exception of Hispanic/white segregation in 1990, St. Paul's Dissimilarity Index values have indicated moderate segregation consistently throughout the last 30 years. Asian residents, who make up a staggering 25% of the city's population, have maintained the highest level of segregation in relation to white residents since 1990, and the current Index values indicate that Asian residents are highly segregated. Hispanic/white segregation has steadily increased since 1990, though the percentage points have only increased by roughly 7% in that time.

Black/white segregation in 1990 indicated that over 50% of Black residents would need to move in order to be evenly distributed throughout St. Paul in relation to whites. Currently, that number has decreased slightly to 46.72.

Table 13 Dissimilarity Index Values by Race and Ethnicity for Washington County

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	29.09	27.3	30.31	30.75
Black/White	51.07	42.55	39.87	43.36
Hispanic/White	24.72	24.98	27.47	30.10
Asian or Pacific Islander/White	16.47	20.97	30.26	39.96

Source: Based on American Community Survey Estimates, 2013-2017; Brown Longitudinal Tract Database See Data Documentation for more information.

Overall nonwhite/white segregation levels for Washington County have remained steady since 1990, with the Dissimilarity Index values only fluctuating between 27.3 and 30.75. All of these values indicate low nonwhite/white segregation. Hispanic/white segregation occurs at similar levels, though this number has increased roughly 6 percentage points since 1990. Currently, 30% of Hispanic residents in Washington County would need to move to a different census tract in order to be evenly distributed in relation to white residents. Asian and Black residents have the highest rates of segregation. Black residents in1990 were the most segregated, with the Dissimilarity Index value indicating moderate segregation—though this number was pushing up against the threshold for high segregation. Black/white segregation levels have steadily decreased since 1990, and currently 43% of Black residents would need to move in order to be evenly distributed. Asian/white segregation has seen the sharpest increase since 1990. Since 1990, the Asian population has increased by roughly 7 percentage points, and the Index values for Asian/white segregation have more than doubled.

Table 14 Dissimilarity Index Values by Race and Ethnicity for Woodbury

Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	7.82	6.93	7.7	14.60
Black/White	16.59	16.93	15.79	21.03
Hispanic/White	9.1	9.55	8.59	19.48
Asian or Pacific Islander/White	18.82	9.22	9.82	14.80

Source: Based on American Community Survey Estimates, 2013-2017; Brown Longitudinal Tract Database See Data Documentation for more information.

The city of Woodbury has some of the lowest levels of segregation throughout the region. Overall nonwhite/white Dissimilarity Index values indicate that just over 14% of nonwhite residents would need to move to a different census tract in order to be evenly distributed throughout the city. Asian/white segregation is at the same level of low segregation. Black/white and Hispanic/white

segregation are slightly higher, though still indicate low levels of segregation. Black/white Segregation has remained high since 1990, though in that time the Index values have only increased by roughly 5 points. Overall nonwhite/white segregation and Hispanic/white segregation increased the most dramatically over time, but these levels were extremely low in 1990. Asian/White segregation was the highest in 1990, but dropped by half in 2000 and 2010.

Table 15 Dissimilarity Index Values by Race and Ethnicity for Scott County

Racial/Ethnic Dissimilarity Index	Current
Non-White/White	31.45
Black/White	49.46
Hispanic/White	34.13
Asian or Pacific Islander/White	37.08

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

Trend data for Scott County was not available, but current Dissimilarity Index values indicate low to moderate levels of segregation. Nonwhite/white segregation is on the higher end of the low segregation category, with roughly 30% of nonwhite residents needing to move to a different census tract in order to be evenly distributed in relation to white residents. Hispanic/white and Asian/white segregation are closer to the threshold for moderate segregation, as 34% and 37% of these residents would need to move to be evenly distributed. Black residents in the county are the most segregated. With a Dissimilarity Index value of 49.46, Black/white segregation in Scott County reaches moderate levels. This value is also just 5 points shy of the threshold for high segregation.

Table 16 Dissimilarity Index Values by Race and Ethnicity for Carver County

Racial/Ethnic Dissimilarity Index	Current
Non-White/White	27.57
Black/White	41.10
Hispanic/White	35.78
Asian or Pacific Islander/White	32.98

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

Trend data for Carver County was not available, but current Dissimilarity Index values indicate low to moderate levels of segregation. Overall nonwhite/white segregation levels reflect that under 30% of minority residents in the county would need to move in order to be evenly distributed in relation to whites. This number is small in actuality, as Carver County is almost 90% white. Roughly 33% of Asian residents and 35% of Hispanic residents would need to move census tracts in order to be evenly distributed. This is a lower level of segregation than Black residents, despite

Asian residents and Hispanic residents being the largest minority groups in the county percentage-wise. Black residents have the highest levels of segregation in the County, with Dissimilarity Index values that cross the threshold into moderate segregation. Despite making up just 1.47% of the population, the small amount of Black residents in Carver county appear to be rather segregated from white residents, and at a higher rate than other minority groups.

Isolation and Exposure Index

In addition to the Dissimilarity Index, social scientists also use the Isolation and Exposure Indices to measure segregation. These indices, when taken together, capture the neighborhood demographics experienced, on average, by members of a particular racial or ethnic group within a city or metropolitan area. The Isolation Index measures what percentage of the census tract in which a person of a certain racial identity lives is comprised of other persons of that same racial/ethnic group. Values for the Isolation Index range from 0 to 100. The Exposure Index is a group's exposure to all racial groups. Values for the Exposure Index also range from 0 to 100. A larger value means that the average group member lives in a census tract with a higher percentage of people from another group.

Table 17 Isolation Index Values by Race and Ethnicity, Region

Isolation Index	Current
White/White	79.00
Black/Black	22.33
Hispanic/Hispanic	13.33
Asian/Asian	16.00

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

In the region, white residents are the most concentrated among the racial groups, which comes as no surprise given that the Region is overwhelmingly white. The Isolation Index values illustrate this effectively, as a white resident in the Region lives in a census tract that is 79% white. However, these values also indicate a disproportionate concentration of residents compared to their proportion of the population. Black residents make up just 7% of the Region's population, yet a Black resident in the region lives in a census tract that is 22% Black. Hispanic residents make up just 5% of the Region's population, yet a Hispanic resident in the region lives in a census tract that is 13% Hispanic. Similarly, Asian residents make up just 6% of the Region's population, yet an Asian resident lives in a census tract that is 16% Asian.

Table 18 Exposure Index Values for Region

Exposure Index	Current
Black/White	53.60
Hispanic/White	60.36
Asian/White	59.61
White/Black	6.58
Hispanic/Black	13.14
Asian/Black	12.78
White/Hispanic	5.09

Black/Hispanic	9.04
Asian/Hispanic	7.51
White/Asian	5.90
Black/Asian	10.31
Hispanic/Asian	8.81

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

In the Region, all minority groups live in census tracts that are majority white. Hispanic and Asian residents live in census tracts that are slightly more white than Black residents. Of the minority groups, Black residents live in census tracts that have more Asian residents. Asian residents live in census tracts that have more Black residents. Asian residents have the most exposure to Black residents in the census tracts that they live in. Hispanic residents also have the most exposure to black residents in their census tracts. This indicates that in the Region, Black residents tend to concentrate in census tracts with other minority racial groups. White residents in the Region have the most exposure to Black residents in their census tracts, thought the values for white residents and all racial groups very only slightly.

Table 19 Isolation Index Values by Race and Ethnicity, Anoka County

Isolation Index	Current
White/White	84.04
Black/Black	11.97
Hispanic/Hispanic	8.38
Asian/Asian	6.67

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

Anoka County values reflect significantly whiter census tracts than the region. A white resident in the County lives in a census tract that is 84% white. An Asian resident lives in a census that is 6% Asian. While this corresponds to the County being 82% white and nearly 7% Asian, the remaining values indicate concentration and overrepresentation of Black and Hispanic residents compared to their population proportion. Despite the Anoka County being just 5% Black, a Black resident lives in a census tract that is 11% Black. A Hispanic resident lives in a census tract that is 8% Hispanic, yet Hispanic residents make up just 4% of Anoka County's population.

Table 20 Exposure Index Values for Anoka County

Exposure Index	Current
Black/White	72.55
Hispanic/White	74.98
Asian/White	78.45
White/Black	4.80
Hispanic/Black	8.09
Asian/Black	6.66
White/Hispanic	3.84

Black/Hispanic	6.26
Asian/Hispanic	4.84
White/Asian	4.06
Black/Asian	5.21
Hispanic/Asian	4.88

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

All racial groups are most likely to live in a census tract with high percentages of white residents. Asian residents live in the census tracts that are the most white, 78%, though Hispanic/white and Black/white values are also in the 70s. White residents have roughly equal exposure to all minority groups in the county. Of the minority groups, Black residents have the most exposure to Asian residents within their census tracts and Asian residents have the most exposure to Asian residents. Hispanic residents have the most exposure to Black residents, and have the highest level of exposure to another minority group than any other. A Hispanic resident lives in a census tract that is 8% Black, despite the County being only 5% Black.

Table 21 Isolation Index Values by Race and Ethnicity, Coon Rapids

Isolation Index	Current
White/White	83.31
Black/Black	8.29
Hispanic/Hispanic	6.12
Asian/Asian	4.97

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

Coon Rapids has similar Isolation Index to Anoka County as a whole, with even lower Index values for Minority residents. A white resident in Coon Rapids lives in a census tract that is 83% white, whereas the next highest index value indicates that a Black resident in Coon Rapids lives in a census tract that is just 8% Black. Hispanic and Asian residents have the lowest Isolation Index Values for the city. A Hispanic resident lives in a census tract that is just 6% Hispanic, and an Asian resident lives in a tract that is less than 5% Asian.

Table 22 Exposure Index Values for Coon Rapids

Exposure Index	Current
Black/White	80.58
Hispanic/White	80.53
Asian/White	82.21
White/Black	5.76
Hispanic/Black	6.19
Asian/Black	5.59
White/Hispanic	3.77
Black/Hispanic	4.05
Asian/Hispanic	4.03

White/Asian	4.00
Black/Asian	3.81
Hispanic/Asian	4.19

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

All minority racial groups live in census tracts that are extremely white. There is little significant variation among the racial groups as it relates to exposure to white residents. White residents are the most exposed to Black residents in Coon Rapids, despite Asian residents being the largest minority group. Aside from white residents, Black residents have nearly equal exposure to Asian and Hispanic residents, despite the differences in population size. Aside from white residents, Hispanic residents have the most exposure in their census tracts to Black residents. Asian residents have the most exposure to Black residents out of the minority racial groups.

Table 23 Isolation Index Values by Race and Ethnicity, Dakota County

Isolation Index	Current
White/White	81.15
Black/Black	10.85
Hispanic/Hispanic	12.89
Asian/Asian	7.13

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

Dakota County has similarly high Isolation Index Values for white residents but the values for minority residents indicate higher concentrations of these racial groups in certain census tracts. A white resident in Dakota County lives in a census tract that is over 80% white. Hispanic residents have the second highest index values, with a Hispanic resident in the county living in a census tract that is nearly 13% Hispanic. This value indicates that Hispanic residents may be overly concentrated in census tracts, as the Hispanic population in Dakota county is just 6% of the total population. A Black resident has a similar Isolation Index value, where a Black resident in the county lives in a census tract that is nearly 11% Black, yet Black residents make up just 5% of the population. Asian residents have the lowest Index values. In Dakota County, an Asian resident lives in a census tract that is just 7% Asian. This value indicates that Asian residents are more integrated among census tracts relative to population size, as the Asian population in Dakota County is over 12%.

Table 24 Exposure Index Values for Dakota County

Exposure Index	Current
Black/White	71.74
Hispanic/White	72.07
Asian/White	76.79
White/Black	5.03
Hispanic/Black	6.76
Asian/Black	6.31
White/Hispanic	6.11

Black/Hispanic	8.17
Asian/Hispanic	6.78
White/Asian	4.58
Black/Asian	5.37

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

All minority group residents in Dakota County have the highest exposure to white residents. White residents have the most exposure in their census tracts to Hispanic residents. Aside from white residents, Black residents have the most exposure to Hispanic residents as well, and this is the highest Exposure index value among minority groups at roughly 8%. Aside from white residents, Hispanic residents also have the highest exposure to Black residents, though this number is just slightly lower. Asian residents have roughly equal exposure to Black and Hispanic residents.

Table 25 Isolation Index Values by Race and Ethnicity, Hennepin County

Isolation Index	Current
White/White	76.05
Black/Black	27.24
Hispanic/Hispanic	15.94
Asian/Asian	13.25

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

Isolation Index values for Hennepin County reflect the additional diversity contained within its larger cities like Minneapolis. A white resident in the County lives in a census tract that is 75% white, lower than the index values for white residents in some of the more suburban/rural counties. Minority group residents in Hennepin County have significantly higher Isolation Index values than in most other counties and the region as a whole, which indicates not only that Hennepin County is more diverse but also that these groups tend to be more concentrated. Black residents have the highest values. A Black resident in the county lives in a census tract that is 27% Black. This value is more than 10 points higher than that of Hispanic residents and over twice as high as the value for Asian residents. A Hispanic resident lives in a census tract that is nearly 16% Hispanic, and an Asian resident lives in a census tract that is 13% Asian.

Table 26 Exposure Index Values for Hennepin County

Exposure Index	Current
Black/White	49.04
Hispanic/White	54.02
Asian/White	59.90
White/Black	8.85
Hispanic/Black	18.27
Asian/Black	15.79
White/Hispanic	5.33
Black/Hispanic	9.99
Asian/Hispanic	6.88

White/Asian	6.02
Black/Asian	8.80
Hispanic/Asian	7.01

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

As with the Isolation Index, Hennepin County Exposure Index values reflect the greater diversity of the County and also highlight the segregation of minority groups. While all racial groups maintain the highest exposure to white residents, concentrations of certain combinations of minority groups are more evident. Black residents are the only racial group to live in a census tract that is less than 50% white. Beyond white residents, Black residents have the most exposure to Hispanic residents, living in census tracts that are 10% Hispanic. Hispanic residents have slightly higher exposure to white residents, and have the highest exposure to Black residents out of the minority racial groups. Hispanic residents in Hennepin County live in a census tract that is nearly 20% Black. Asian residents have the highest exposure to white residents, and similarly high exposure to Black residents. Asian residents live in a census tract that is 15% Black.

Table 27 Isolation Index Values by Race and Ethnicity, Bloomington

Isolation Index	Current
White/White	75.23
Black/Black	14.84
Hispanic/Hispanic	15.64
Asian/Asian	6.82

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

Isolation Index values for the city of Bloomington indicate that a white resident lives in a census tract that is 75% white. Black and Hispanic residents have similar index values, with a Black or Hispanic resident living in a census tract that is roughly 15% Black or Hispanic, respectively. These values indicate higher concentrations of Black and Hispanic residents relative to their proportion of the population, as Black residents make up just 9% of the Bloomington population and Hispanic residents make up just 8%. Asian residents have the lowest index values, as an Asian resident lives in a census tract that is just under 7% Asian. This number staggering given that Asian residents make up 17% of the population. This indicates that Asian residents are the least segregated minority group in the city. For Black and Asian residents, these values are significantly lower than for the county overall.

Table 28 Exposure Index Values for Bloomington

Exposure Index	Current
Black/White	63.56
Hispanic/White	61.49
Asian/White	69.56
White/Black	8.05
Hispanic/Black	12.62
Asian/Black	9.60

White/Hispanic	7.43
Black/Hispanic	12.03
Asian/Hispanic	10.29
White/Asian	5.41
Black/Asian	5.89
Hispanic/Asian	6.62

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

In Bloomington, white residents have the most exposure in their census tract to Black residents. All minority racial groups have the most exposure to white residents. Asian residents have the highest exposure, with an Asian resident in Bloomington living in a census tract that is 69% white. Of the minority racial groups, Asian residents have the most exposure to Hispanic residents, living in a census tract that is 10% Hispanic. Black residents have the second highest exposure to white residents, living in a census tract that is 63% white. Of the minority racial groups, Black residents have the highest exposure to Hispanic residents. Hispanic residents have the lowest exposure to white residents, at just 61%. Of this minority racial groups, Hispanic residents have the highest exposure to Black residents.

Table 29 Isolation Index Values by Race and Ethnicity, Eden Prairie

Isolation Index	Current
White/White	78.85
Black/Black	11.74
Hispanic/Hispanic	10.42
Asian/Asian	15.45

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

In Eden Prairie, a white resident lives in a census tract that is nearly 80% white. Asian residents are the largest minority group in the city, and Isolation Index values indicate that they are the most concentrated as well. An Asian resident in Eden Prairie lives in a census tract that is 15% Asian. Black and Hispanic residents have similar values that are lower compared to Asian residents. A Black resident in Eden Prairie lives in a census tract that is roughly 12% Black, and a Hispanic resident in Eden Prairie lives in a census tract that is 10% Hispanic. These values are lower, significantly lower for Black residents, than values for Hennepin County overall.

Table 30 Exposure Index Values for Eden Prairie

Exposure Index	Current
Black/White	71.48
Hispanic/White	62.14
Asian/White	69.10
White/Black	5.60
Hispanic/Black	7.97
Asian/Black	5.27
White/Hispanic	3.59

Black/Hispanic	5.87
Asian/Hispanic	7.31
White/Asian	9.21
Black/Asian	8.96
Hispanic/Asian	16.87

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

White residents in Eden Prairie have the most exposure to Asian residents within their census tracts. A white resident lives in a census tract that is 9% Asian. Black and Asian residents have the highest exposure to white residents, with Hispanic residents just 7% behind. Aside from white residents, Black residents have the highest exposure to Asian residents. Hispanic residents also have the highest exposure to Asian residents aside from white residents. A Hispanic resident in Eden Prairie lives in a census tract that is 16% Asian, despite Asian residents being just 10% of the population. Asian residents, however, have roughly equal exposure to Black and Hispanic residents, and at lower rates of between 5 and 7%. This indicates a concentration of Asian residents within the city that also have concentrations of Black and Hispanic residents that are smaller in size, likely due to the smaller population size.

Table 31 Isolation Index Values by Race and Ethnicity, Minneapolis

Isolation Index	Current
White/White	69.83
Black/Black	33.60
Hispanic/Hispanic	20.51
Asian/Asian	12.30

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

As mentioned above, Minneapolis is the largest and most diverse city in the County, which likely skews the County-wide data a bit. Not only are minority groups more prevalent, these Isolation Index values indicate that Black and Hispanic residents are concentrated in census tracts within Minneapolis. A white resident in Minneapolis lives in a census tract that is just under 70% white. This value is the second lowest in the region. Minority groups, particularly Black and Hispanic residents have some of the highest Isolation Index values in the region. A Black resident in Minneapolis lives in a census tract that is over 33% Black, indicating a concentration of Black residents given that Black residents make up less than 20% of the city's population. Similarly, Hispanic resident in the city lives in a census tract that is over 20% Hispanic, when the city's population is just under 10% Hispanic. Comparatively, an Asian resident lives in a census tract that is just 12% Asian, despite Asian residents comprising nearly 30% of the city's population.

Table 32 Exposure Index Values for Minneapolis

Exposure Index	Current
Black/White	40.37
Hispanic/White	45.25
Asian/White	49.02

White/Black	12.54
Hispanic/Black	22.90
Asian/Black	23.96
White/Hispanic	7.37
Black/Hispanic	12.02
Asian/Hispanic	8.47
White/Asian	4.95
Black/Asian	7.78
Hispanic/Asian	5.24

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

In Minneapolis, Exposure Index values confirm that white residents live in census tracts that are majority white, but none of the minority racial groups do. Of the minority racial groups, white residents have the most exposure to Black residents within the city. A white resident in Minneapolis lives in a census tract that is 12% Black. They have the least exposure to Asian residents, despite Asian residents being the overwhelmingly largest minority racial group in the city. Compared to other cities in the county with larger Asian populations, white and Asian residents appear to be less integrated. Among the minority racial groups, Asian residents have the highest exposure to white residents. An Asian resident lives in a census tract that is 49% white. Of the other racial groups, Asian residents have the highest exposure to Black residents. An Asian resident in Minneapolis lives in a census tract that is 23% Black, a percentage higher than the percentage of Black residents in the city (18%). A Black resident in Minneapolis lives in a census tract that is just 40% white. Given that the city is nearly 60% white, this indicates that Black residents are more segregated from white residents and are more concentrated with other minority groups. A Hispanic resident in Minneapolis lives in a census tract that is 45% white. Again, this indicates that Hispanic residents are more segregated from the 60% white population. Of the other racial groups, Hispanic residents have the most exposure to Black residents. A Hispanic resident in Minneapolis lives in a census tract that is 22% black.

Table 33 Isolation Index Values by Race and Ethnicity, Minnetonka

Isolation Index	Current
White/White	87.73
Black/Black	10.08
Hispanic/Hispanic	2.66
Asian/Asian	6.96

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

Isolation Index values for white residents in Minnetonka are the highest in Hennepin County, and some of the highest across the entire region. A white resident in Minnetonka lives in a census tract that is over 87% white. This is likely due to the small minority population in the city, which when combined, only comprises roughly 12% of the population. A Black resident lies in a census tract that is 10% Black, which indicates overrepresentation or concentration, given that Black residents

make up just 4.26% of the Minnetonka population. The Index values for Hispanic and Asian residents correlate almost exactly to their proportion of the population.

Table 34 Exposure Index Values for Minnetonka

Exposure Index	Current
Black/White	80.38
Hispanic/White	86.17
Asian/White	81.69
White/Black	3.78
Hispanic/Black	3.40
Asian/Black	5.59
White/Hispanic	2.11
Black/Hispanic	1.77
Asian/Hispanic	2.53
White/Asian	3.83
Black/Asian	5.57
Hispanic/Asian	4.85

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

In Minnetonka, correlating heavily with the fact that the city is 86% white, all other racial groups have extremely high exposure to white residents. Hispanic residents have the highest exposure. A Hispanic resident in Minnetonka lives in a census tract that is 86% white. Of the other racial groups, Hispanic residents have the highest exposure to Asian residents. Asian and Black residents have roughly equal exposure to white residents. An Asian resident in Minnetonka lives in a census tract that is 81% white, and a Black resident lives in a census tract that is 80% white. Of the minority racial groups, Asian residents have the highest exposure to Black residents. An Asian resident in the city lives in a census tract that is 5% Black, correlating to the 5% Black population of the city. Black residents likewise have the most exposure to Asian residents out of all the minority racial groups.

Table 35 Isolation Index Values by Race and Ethnicity, Plymouth

Isolation Index	Current
White/White	79.21
Black/Black	8.23
Hispanic/Hispanic	5.57
Asian/Asian	13.65

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

Isolation Index values for the city of Plymouth indicate that white residents in the city live in a census tract that is just under 80% white. A Black resident in Plymouth lives in a census tract that is 8.23% Black, which indicates a slight concentration given that Black residents make up just 5.62% of the Plymouth population. Asian residents are slightly more overrepresented in census tracts as well, as an Asian resident lives in a census tract that is 13.65% Asian, despite Asian

residents making up only 10% of the population. Isolation Index values for Hispanic residents indicate proportional representation in census tracts. A Hispanic resident in Plymouth lives in a census tract that is 5% Hispanic, and Hispanic residents make up 4.43% of the Plymouth population.

Table 36 Exposure Index Values for Plymouth

Exposure Index	Current
Black/White	74.04
Hispanic/White	76.01
Asian/White	73.50
White/Black	5.29
Hispanic/Black	6.28
Asian/Black	5.98
White/Hispanic	4.28
Black/Hispanic	4.95
Asian/Hispanic	4.40
White/Asian	8.45
Black/Asian	9.61
Hispanic/Asian	8.98

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

In Plymouth, an Asian, Black, and Hispanic resident all live in a census tract that is between 73 and 76% white. White residents have the highest exposure to Asian residents, as a white resident in Plymouth lives in a census tract that is 8.45% Asian. Black residents have the highest exposure to Asian residents out of all the minority racial groups as well. A Black resident in Plymouth lives in a census tract that is 9.61% Asian. Aside from white residents, Hispanic residents also have the highest exposure to Asian residents. A Hispanic resident in Plymouth lives in a census tract that is nearly 9% Asian. Given that Asian residents comprise the largest minority group in Plymouth (10%), these numbers indicate that Asian residents are not segregated or concentrated. Rather, they seem to be integrated throughout the city's census tracts rather proportionally.

Table 37 Isolation Index Values by Race and Ethnicity, Ramsey County

Isolation Index	Current
White/White	71.94
Black/Black	21.42
Hispanic/Hispanic	13.24
Asian/Asian	25.71

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

Like Hennepin County, Ramsey County has similarly high Isolation Index values for minority groups, likely due to the inclusion of the larger and more diverse city of St. Paul. A white resident in Ramsey County lives in a census tract that is almost 72% white. This Isolation Index value, combined with the higher Index values for minority groups, indicates segregation and isolation of

white residents, which make up just 63% of the County population. Black residents make up just 11% of the County population, yet a Black resident in the county lives in a census tract that is 21% Black. Likewise, Asian residents make up 18% of the County population, yet an Asian resident in Ramsey County lives in a census tract that is 25% Asian. Hispanic residents are the most overrepresented in census tracts compared to their population proportion. Despite making up just 7% of the population, a Hispanic resident in Ramsey County lives in a census tract that is over 13% Hispanic. These values reflect that minority residents are more concentrated than is proportionately representative compared to population, and that white residents live around more white residents than is proportionately representative compared to population.

Table 38 Exposure Index Values for Ramsey County

Exposure Index	Current
Black/White	46.41
Hispanic/White	50.22
Asian/White	44.97
White/Black	8.27
Hispanic/Black	13.37
Asian/Black	14.82
White/Hispanic	5.91
Black/Hispanic	8.83
Asian/Hispanic	9.73
White/Asian	9.99
Black/Asian	18.47
Hispanic/Asian	18.34

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

As with Hennepin County, the Exposure Indices for Ramsey County reflect that despite higher minority populations, white residents have less exposure to these groups. A white resident in Ramsey County lives in a census tract that is just 8% Black, 6% Hispanic, and 10% Asian. A Black resident in the County lives in a census tract that is 46% white, despite the County being 63% white. Of the other racial groups, Black residents have the highest exposure to Asian residents, at levels that mirror the proportion of Asian residents in the County. An Asian resident lives in a census tract that is 45% white. Asian residents have the second highest exposure to Black residents, at roughly 15%. Hispanic residents in Ramsey County have the highest exposure to white residents, crossing the threshold of 50%. Hispanic residents have next highest exposure to Asian residents, at levels that mirror the proportion of Asian residents in the County.

Table 39 Isolation Index Values by Race and Ethnicity, St. Paul

Isolation Index	Current
White/White	64.25
Black/Black	25.03
Hispanic/Hispanic	15.52
Asian/Asian	30.74

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

As with Ramsey County as a whole, St. Paul's Isolation Index values show higher concentrations of both white and residents compared to their proportions of the population, indicating that despite higher levels of diversity across racial groups, these groups remain somewhat segregated. A white resident in St. Paul lives in a census tract that is 64% white, yet white residents make up just 52% of the population. A Black resident lives in a census tract that is 25% Black, despite making up just 15% of the population. A Hispanic resident lives in a census tract that is 15% Hispanic, but Hispanic residents make up just 9% of the population. Asian residents are just slightly overrepresented in census tract distribution. An Asian resident in St. Paul lives in a census tract that is 30% Asian, and Asian residents make up 25% of the city's population.

Table 40 Exposure Index Values for St. Paul

Exposure Index	Current
Black/White	39.07
Hispanic/White	42.21
Asian/White	34.87
White/Black	11.54
Hispanic/Black	15.67
Asian/Black	17.86
White/Hispanic	7.82
Black/Hispanic	9.83
Asian/Hispanic	11.47
White/Asian	12.07
Black/Asian	20.94
Hispanic/Asian	21.42

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

The Exposure Index values for the city of St. Paul indicate that despite minority racial the higher racial diversity in the city, white residents still do not live in census tracts that contain percentages of minority racial group that are even proportional to the city's population. In addition, the city's minority racial groups have higher Exposure values to each other, indicating higher concentrations of minority groups. White residents in St. Paul have the most exposure to Asian residents. Yet despite Asian residents comprising 25% of the population, a white resident in the city lives in a census tract that is just 12% Asian. White residents have the least exposure to Hispanic residents. Black residents in the city have the most exposure to white and Asian residents. A Black resident in St. Paul lives in a census tract that is 39% white, and 20% Asian. Hispanic residents have the

highest exposure to white and Asian residents as well. A Hispanic resident in St. Paul lives in a census tract that is 42% white and 21.42% Asian. Asian residents have the highest exposure to white residents and Black residents. An Asian resident in St. Paul lives in a census tract that is 34% white, and 17% Black.

Table 41 Isolation Index Values by Race and Ethnicity, Washington County

Isolation Index	Current
White/White	84.94
Black/Black	9.07
Hispanic/Hispanic	5.79
Asian/Asian	8.77

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

In Washington County, a white resident lives in a census tract that is almost 85% white. This is one of the highest values in the Region, though it is explained in part by the fact that the County is nearly 84% white. Black residents are slightly overrepresented compared to their proportion in the population, as a Black resident lives in a census tract that is 9% Black, while Black residents make up just 4% of the population. Asian and Hispanic residents are concentrated relatively proportionally within census tracts in the County. An Asian resident lives in a census tract that is almost 9% Asian, and a Hispanic resident lives in a census tract that is 5% Hispanic.

Table 42 Exposure Index Values for Washington County

Exposure Index	Current
Black/White	74.44
Hispanic/White	79.02
Asian/White	77.94
White/Black	3.62
Hispanic/Black	5.07
Asian/Black	5.38
White/Hispanic	3.70
Black/Hispanic	4.89
Asian/Hispanic	4.89
White/Asian	5.04
Black/Asian	7.16
Hispanic/Asian	6.74

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

Exposure Index values for Washington County reflect the overwhelming whiteness of the County. All of the minority racial groups in the county (none of which have a population percentage of more than 8%) have exposure to white residents in the census tract they live in that is between 74 and 79%. Hispanic residents have the highest exposure to white residents. They have the second most exposure to Asian residents, though only slightly. Asian residents have the next highest exposure to white residents. Of the other racial groups, Asian residents have the most exposure to

Black residents, though only slightly. Black residents have the least exposure to white residents, though this number is obviously still very high. Of the other racial groups, Black residents have the most exposure to Asian residents as well. These values are not surprising given that Asian residents are the largest minority group in the County.

Table 43 Isolation Index Values by Race and Ethnicity, Woodbury

Isolation Index	Current
White/White	76.67
Black/Black	7.30
Hispanic/Hispanic	5.83
Asian/Asian	10.47

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

Though Isolation Index values for the city of Woodbury indicate that a white resident lives in a census tract that is 76% white, the values for white and minority groups correlate almost exactly with population data. This tends to show that despite the city being overwhelmingly white, minority residents are distributed relatively evenly throughout census tracts. A Black resident lives in a census tract that is 7% Black, a Hispanic resident lives in a census tract that is roughly 6% Hispanic, and an Asian resident lives in a census tract that is 10% Asian.

Table 44 Exposure Index Values for Woodbury

Exposure Index	Current
Black/White	73.73
Hispanic/White	74.46
Asian/White	75.25
White/Black	5.60
Hispanic/Black	6.46
Asian/Black	5.89
White/Hispanic	4.92
Black/Hispanic	5.61
Asian/Hispanic	5.08
White/Asian	9.41
Black/Asian	9.68
Hispanic/Asian	9.61

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

At 76% white, the Exposure Index values for Woodbury are appropriately high. All other racial groups have exposure to white residents at between 73 and 75%. White resdients have the highest exposure to Asian residents. Besides white residents, Asian residents have roughly equal exposure to Black and Hispanic residents. These values, 5.89 and 5.08, correspond almost exactly with the percentages of Black and Hispanic residents in Woodbury (5.79% and 5.03%). Besides white residents, Hispanic and Black residents have the highest exposure to Asian residents. Overall,

Exposure Index values reflect a distribution among census tracts that is relatively reflective of the distribution of racial groups in the Woodbury.

Table 45 Isolation Index Values by Race and Ethnicity, Scott County

Isolation Index	Current
White/White	83.51
Black/Black	7.07
Hispanic/Hispanic	8.26
Asian/Asian	9.01

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

A similarly overwhelmingly white county, the Isolation Index values for Scott County reflect that white and Asian residents are represented in the census tracts in which they live at rates that are extremely similar to their proportional representation in the county population. A white resident lives in a census tract that is 83% white, and the County is 82% white. Similarly, an Asian resident lives in a census tract that is 9% Asian, and the County is 8.29% Asian. Black and Hispanic residents, however, are overrepresented in census tracts compared to their proportion of the population, indicating that within Scott County, these two racial groups are slightly more concentrated. A Black resident in the county lives in a census tract that is 7% Black, while Black residents make up 3% of the population, and a Hispanic resident lives in a census tract that is 8% Hispanic, while Hispanic residents make up roughly 5% of the population.

Table 46 Exposure Index Values for Scott County

Exposure Index	Current
Black/White	74.32
Hispanic/White	77.25
Asian/White	76.46
White/Black	3.05
Hispanic/Black	4.20
Asian/Black	4.86
White/Hispanic	4.61
Black/Hispanic	6.12
Asian/Hispanic	5.64
White/Asian	5.58
Black/Asian	8.66
Hispanic/Asian	6.90

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

In Scott County, all minority racial groups have the highest exposure to white residents. Across Black, Hispanic, and Asian residents, this value varies by just 3 percentage points. White residents have the highest exposure to Asian residents, though this value is within two percentage points of those for other minority groups. For Asian residents, aside from white residents, they have the most exposure to Hispanic residents. Hispanic residents have the highest exposure to white

residents out of all the other racial groups. Of the minority racial groups, Hispanic residents have the highest exposure to Asian residents. Black residents have the lowest exposure to white residents out of all the other racial groups. Of the minority racial groups, Black residents have the highest exposure to Asian residents. These values are consistent with population proportions of minority groups, and the fact that Asian residents are the largest minority group in the Scott County.

Table 47 Isolation Index Values by Race and Ethnicity, Carver County

Isolation Index	Current
White/White	90.14
Black/Black	2.58
Hispanic/Hispanic	7.90
Asian/Asian	4.99

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

Carver County has the highest Isolation Index values for white residents out of the entire county, but that value correlates almost exactly with the percentage of white residents in the County. A white resident in Carver County lives in a census tract that is 90% white, and the County is 89.64% white. Asian residents are similarly evenly distributed, as the county is 5% Asian and an Asian resident in the County lives in a census tract that is nearly 5% Asian. Hispanic residents are the most overrepresented, as a Hispanic resident lives in a census tract that is nearly 8% Hispanic, but Hispanic residents make up just 4% of the population. A Black resident lives in a census tract that is just 2% Black, which correlates to Black residents making up under 2% of the population.

Table 48 Exposure Index Values for Carver County

Exposure Index	Current
Black/White	86.20
Hispanic/White	83.79
Asian/White	87.34
White/Black	1.41
Hispanic/Black	1.99
Asian/Black	1.57
White/Hispanic	3.83
Black/Hispanic	5.56
Asian/Hispanic	4.07
White/Asian	2.43
Black/Asian	2.66
Hispanic/Asian	2.47

Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.

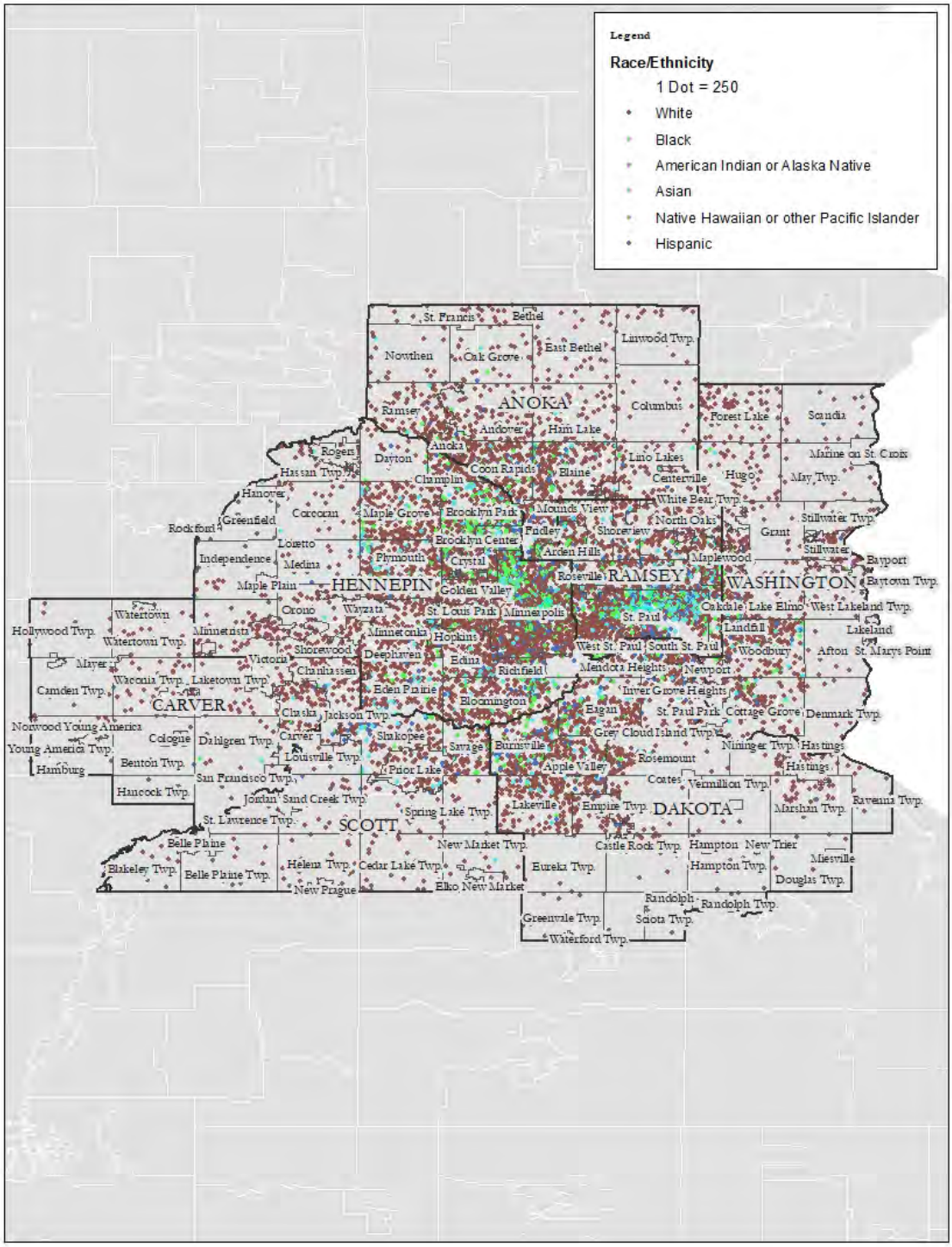
Exposure Index values for Carver County correlate strongly with the overwhelmingly white population. All of the minority groups in the county have the highest exposure to white residents, in which a Hispanic, Black, and Asian resident living in a census tract that is between 83% and

87% white. White residents have the highest exposure to Hispanic residents, at a rate similar to the distribution of Hispanic residents in the County population. Aside from white residents, Black residents have the highest exposure to Hispanic residents, despite Asian residents making up a larger share of the population. Aside from white residents, Asian residents have the highest exposure to Hispanic residents, at a rate similar to the distribution of residents in Carver County. Beyond white residents, Hispanic residents have the highest exposure to Asian residents, though at half the rate of the distribution of Asian residents in the County.

b. Identify areas in the jurisdiction and region with relatively high segregation and integration by race/ethnicity, national origin, or LEP group, and indicate the predominant groups living in each area.

c. Discuss how patterns of segregation have changed over time (since 1990).

Race/Ethnicity
Map 1: Race/Ethnicity, Region[2]



[2] *Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.*

In the Region, the vast majority of the population across races is concentrated in the urban centers of Minneapolis and St. Paul, as well as their immediate outer lying suburbs. While white residents heavily populate this area and clearly represent the largest racial groups, groupings of white residents also extend into the farther and more rural parts of the region. The entire outer ring of the Region is every sparsely populated by residents of any racial group aside from white residents. Black residents are the most heavily concentrated in Minneapolis, St. Paul, and the northwest suburbs of Minneapolis. Hispanic residents are concentrated most heavily in Minneapolis and St. Paul. Asian residents are most heavily concentrated in Minneapolis and St. Paul, as well as in the southwest suburbs. There are not significant concentrations of American Indian/Alaska Native residents.

**All County and Jurisdiction maps are located in the Segregation Appendix.*

Anoka County
Mapping of Anoka County shows clearly that all residents are clustered towards the southern portion of the county, the area closer to the urban centers of Hennepin and Ramsey County. The most population density is in the cities of Coon Rapids, Blaine, Anoka, Columbian Heights, Fridley, and Spring Lake Park. While white residents populate this area, they are also spread far to more rural North, East and West of the County in cities like Oak Grove, Bethel, East Bethel, Ham Lake, and Ramsey. Black and Hispanic residents are almost exclusively located in the southern portions of the County in Columbia Heights, Coon Rapids, the western portion of Blaine, and Anoka. Asian residents are also concentrated in these areas, through there are groups spread farther into the northern and western parts of Blaine, Ham Lake, Lino Lakes and Ramsey. American Indian or Alaska Native residents are clustered along the border of Coon Rapids and Blaine.

Coon Rapids
In Coon Rapids, white residents are dispersed rather evenly throughout the city. There is a small cluster along the western edge of the city near the border of the city of Anoka. Black residents are clustered towards the center and western areas of the city. American Indian/Alaska native residents live in the northwest corner of the city and on the edge of the Blaine border, though this population is very small, represented by one dot (75 people) in each geographic area. Asian residents are clustered along the city and County border near Champlin, the very southern tip of the city near the Fridley border, northwest of the center of the city, and along the Blaine border. Hispanic residents are dispersed rather evenly throughout the southern and western portions of Coon Rapids, with a more limited presence in the northern half of the city.

Dakota County
The map highlights the extreme suburban/rural duality that exists in Dakota County. All of the population in the County is clustered in the northern and northwestern areas of the County that border Hennepin and Ramsey Counties—the more urban centers of the Region. White residents are concentrated in these areas, as well as a cluster on the eastern edge of the County in the city of Hastings. White residents sparsely populate the rural southern portions of the county, and this area is extremely white, as there are no density dots (concentrations of more than 250 people) of any other race. Black residents are mainly concentrated on the western edge of the county along the Hennepin County boarder in the cities of Burnsville, Apple Valley, and Eagan. There is also a

cluster of Black residents in the most northern tip of Dakota County that border St. Paul, in the cities of West St. Paul and South St. Paul. There is one density dot of Black residents in the Hastings Area, and one on the edge of Farmington. American Indian/Alaska Native residents are not represented on this map as there is not enough density to be represented by a dot. Asian residents are concentrated almost exclusively in Burnsville, Apple Valley, Eagan, and the northern half of Lakeville. There is a smaller cluster of Asian residents in the Inver Grove Heights, South St. Paul, and West St. Paul area. There are no clusters of Asian residents south of Farmington or east of Rosemount. Hispanic residents are concentrated most heavily in Burnsville, Apple Valley, West St. Paul, and South St. Paul. There is a much smaller density of Hispanic residents in Farmington, Hastings and Inver Grove Heights.

Hennepin County

Due to the heavily populated nature of this county, each dot on the map represents a group of 300 residents. The most population density overall in Hennepin County is on the eastern edge that contains Minneapolis and borders St. Paul and Ramsey County. White residents are the most heavily concentrated in Minneapolis and the immediate southwest outer lying suburbs of St. Louis Park Edina, Richfield, and Bloomington. There is another heavy concentration of white residents in Maple Grove and Plymouth, and smaller concentrations in the farther west suburbs of Minnetonka and Eden Prairie. White residents also populate, though far more sparsely, the far west and more rural cities in the county such as Medina, Corcoran, and Minnetrista. Black residents are also most heavily concentrated in Minneapolis, though conversely this concentration spreads mainly to the immediate northeast outer lying suburbs. Heavy concentrations of Black residents exist in Brooklyn Park and Brooklyn Center, Crystal, and Champlin. There are also smaller concentrations of Black residents in Richfield, Hopkins, and St. Louis Park. In the middle strip of the county there are some small clusters of Black residents in cities such as Maple Grove, Plymouth, Minnetonka, and Eden Prairie, though there are almost zero density dots for Black residents west of these cities. The one density dot is on the far western edge of the county in Independence. American Indian/Alaska Native residents are concentrated in Minneapolis, as are Asian residents. Aside from Minneapolis, Asian residents are clustered most heavily in the northeastern portion of the county in Brooklyn Center and Brooklyn Park. There are smaller clusters of Asian residents in the southern portion of the county including Eden Prairie, Bloomington, and Hopkins, as well as farther north in Plymouth, Maple Grove. Hispanic residents are most heavily concentrated in southern Minneapolis and down into Richfield, there are very few density dots of Hispanic residents throughout the rest of Hennepin County.

Bloomington

In Bloomington, white residents are evenly distributed through all corners of the city. The south and western portions of the city have the least concentration of other races, but maintain white density. Black residents are concentrated most heavily in the eastern third of Bloomington, specifically along and just below the border of Richfield. There is a cluster of Black residents in the area of the city just south of the center, but decreasing numbers of Black residents moving farther west. There is one density dot representing American Indian/Alaska Native residents that is in the far southwest corner of the city. Asian residents in Bloomington are also concentrated in the eastern third of the city just south of Richfield. There is a small cluster to the west of center, but similarly decreasing density dots moving further west. Hispanic residents are concentrated almost exclusively in this same third of the city, with even fewer dots throughout the rest of

Bloomington. This mapping indicates that minority group residents in Bloomington are clustered together in the area of the city closes to Minneapolis and its immediate outer ring suburbs.

Eden Prairie

White residents are located throughout the city of Eden Prairie, but at varying levels of density. There is a heavier concentration of white residents immediately to the west of the Bloomington border, in the northwest corner bordering Minnetonka, and the southwest corner along the Carver County line. Black residents are concentrated in the eastern third of the city, along the Bloomington border, with a smaller cluster in the northern part of the city just under Minnetonka. The two density dots representing American Indian/Alaska Native residents in Eden Prairie are located right in the center of the city and in the northwest corner. Asian residents are the most closely clustered and concentrated the same census tract just to the right of the center of Eden Prairie, with a more spread out grouping of residents in the southwest corner. Hispanic residents are almost exclusively concentrated in this same census tract, with a few density dots in each corner of the city.

Minneapolis

The map indicates not only the increased diversity of Minneapolis as one of the urban centers of the Region, but also the very clear segregation of minority groups in certain areas of the city. While all residents are concentrated around the very center, white residents have heavily concentrated in the northern half of the city's center and minority group residents are more heavily concentrated in the southern half of the city's center. White residents are also dispersed throughout other parts of the city, specifically in northeast Minneapolis and the entire southern third of the city. Black residents are concentrated the most heavily in the city, and in the northwestern portion of the city. Not only is this area very heavily concentrated by Black residents, this area has very few white residents as well. There are much smaller clusters of Black residents just south of the city's center, in the far southern edge of the city along the border of Richfield, and in the area just north of center and to the right of the large concentration in the northwest corner. Asian residents are most heavily concentrated in the center of the city and in the northwestern corner of the city that is heavily Black. Hispanic residents are concentrated almost exclusively in the southern half of the city's center, with a few density dots in the northwestern corner of the city and a small cluster along the Richfield border. This map illustrates that despite the larger populations of minority groups, these groups are largely segregated from white residents outside of the city's center.

Minnetonka

Minnetonka is a farther out, extremely white city which is reflected on this map. White residents are roughly evenly distributed throughout the entire city. The city's very small Black population is concentrated almost exclusively in the southeastern corner just south of the Hopkins border. There is an additional small cluster of Black residents in the northeastern corner of the city to the west of the border of St. Louis Park. There are a few density dots representing Black residents (in this map, representing 50 people) sprinkled throughout the center and edges of the county. There is only one dot representing American Indian/Alaska Native residents in Minnetonka, and it is located along the northern border of the city. The city's small Asian population has a small cluster (4-5 density dots) in the southeastern corner of the city near Hopkins, and just a few dots sprinkled throughout the rest of the city. Minnetonka's small Hispanic population is sprinkled throughout the city with no discernable cluster. This map tends to indicate that to the extent that the city's

albeit very small Black and Asian populations are concentrated together, these concentrations are located in the southeast corner.

Plymouth

In Plymouth, white residents are evenly dispersed throughout most parts of the city, though less densely in the northwestern corner. Black residents are concentrated most heavily in the farthest northwest census tract of the city, with a small cluster along the border of New Hope, and occasional density dots throughout the rest of the city. There are just four density dots (each representing just 50 people) representing American Indian/Alaska Native residents in the city of Plymouth. Two dots are located in the southeast corner of the city, one is located in the southwestern portion of the city, and one is located in the very northwestern corner of the city along the Maple Grove border. Asian residents are most heavily concentrated in the northwestern census tract of the city, the census tract immediately to the east of it, and the census tract directly in the middle of Plymouth. Hispanic residents are not heavily concentrated in any area of the city, but distributed rather evenly throughout the city. The census tract in the far southeast corner of the city is the most integrated in terms of the variation of racial groups represented.

Ramsey County

Despite the increased diversity in Ramsey County, this race and ethnicity map illustrates that almost all of these diverse residents are concentrated in the County's urban core of St. Paul. White residents are dispersed throughout the County, with the highest density in the southwestern portion of the county that includes the eastern third of St. Paul. Other areas of increased density include Roseville, New Brighton/Mounds View, and White Bear Lake. Black residents are the most concentrated in the city of St. Paul (discussed in more detail below), with additional, much smaller clusters of Black residents in North St. Paul and Maplewood, Roseville, St. Anthony, New Brighton, and Vadnais Heights. There are no visible clusters of American Indian/Alaska Native residents, though there are density dots (in this map, representing 100 people) located in Blaine, New Brighton, Roseville, and St. Paul. Asian residents are concentrated the most heavily in St. Paul, with additional significant clusters in Maplewood and Roseville. There are smaller clusters of Asian residents farther northwest into New Brighton , Mounds View, and Arden Hills. Hispanic residents are concentrated almost exclusively St. Paul, with a very small cluster in Maplewood and a few density dots throughout the rest of the County.

St. Paul

The race and ethnicity map for St. Paul illustrates clear residential racial segregation. If the city were to be divided into thirds, white residents are concentrated the most heavily in western third of the city across from the Minneapolis border. This density spreads to the middle third of the city, but in the southern half. There are clusters of white residents in the eastern third of the city, but the white population is far less concentrated than in the western third. The northern part of the center of the city is the least populated area of white residents. Black residents are the most concentrated in this same area, as well as the northeastern corner of the city. There are additional clusters in the northwestern and southwestern corners of St. Paul, as well as a strip of clusters along the southeastern border of the city. Asian residents are concentrated almost exclusively along the northern portion of the eastern half of the city, overlapping with the areas of the highest Black concentration. Hispanic residents are concentrated in the far eastern portion of the city, with a cluster to the south of the center of St. Paul across the border from the city of West St. Paul. This

map shows clearly that areas with high concentrations of minority group populations have significantly smaller concentrations of white residents, and the areas with the highest density of concentration for white residents have very few clusters of minority group residents.

Washington County

In Washington County, the majority of the population density exits along the western edge of the county that borders St. Paul and the rest of the eastern portion of Ramsey County. This is true even for white residents, though there are additional, smaller clusters of white residents in Stillwater, Hugo, and Pleasant Lake. The Black population in the county is concentrated almost exclusively in Woodbury, with much smaller amounts of Black residents in Cottage Grove and Oakdale. The County's small Hispanic population is located mainly in Woodbury, Cottage Grove, and Oakdale as well. There are very few dots of any race located in the eastern half of the County. In this map, dots represent 240 people, so there may be smaller pockets of minority group residents in these outer lying cities.

Woodbury

White residents in Woodbury are fairly evenly distributed throughout the city, with heavier concentration in the northwest corner of the city. Black residents are also concentrated in this area of Woodbury, with a smaller cluster in the northeast corner of the city. Even with the dot density level lowered to just 50, there are only two dots representing American Indian/Alaska Native residents in the entire city. Both of these dots are located in the northwest corner of the city. Asian residents are spread rather evenly throughout Woodbury, with slightly larger clusters in the northern half of the city. Hispanic residents are dispersed very evenly as well, with one small cluster in a census tract in the central western part of the city. Overall, the race and ethnicity mapping for Woodbury does not indicate any significant segregation of certain groups.

Scott County

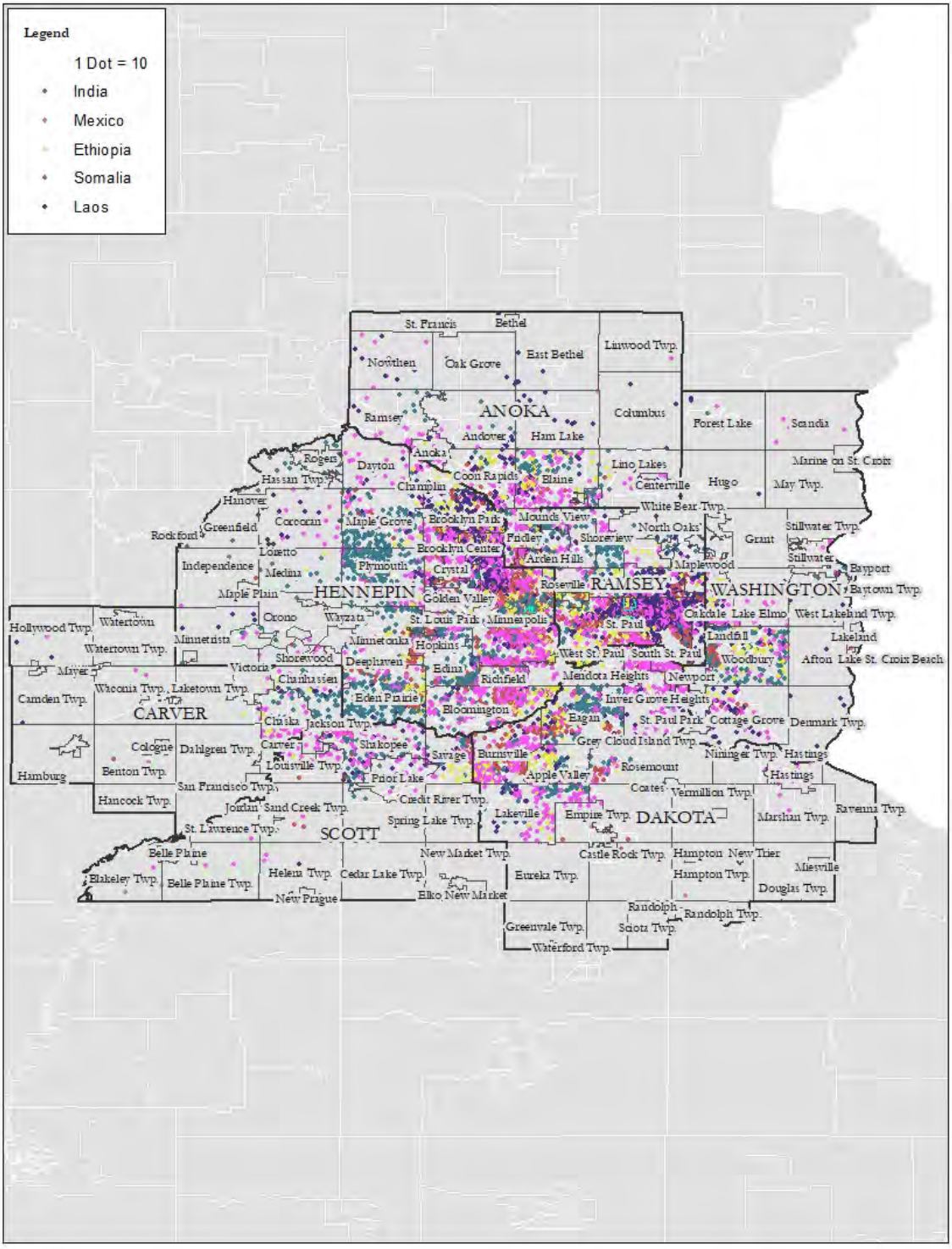
In Scott County, white residents are dispersed throughout, but concentrated most heavily in the northern tip of the county that includes Shakopee, Prior Lake and Savage. Black residents are almost exclusively concentrated in these same areas, with the heaviest concentration in Savage. American Indian/Alaska Native residents are concentrated most heavily in Prior Lake and Shakopee, with a few density dots (in this map, representing 100 people) located in the southern and more rural areas of the county like the Spring Lake Township, the Credit River Township, and the St. Lawrence Township. Asian residents are concentrated most heavily in Shakopee, with an additional cluster in Savage, and a few density dots further south into the Spring Lake Township and Cedar Lake Township. Hispanic residents are concentrated almost exclusively in Shakopee, with a smaller grouping in Savage and Louisville Township. There are also a few density dots located in the far southwest corner of the county, in the Belle Plaine Township and Helena Township

Carver County

Most residents in Carver County are concentrated in the far eastern cities of Chanhassen and Chaska. White residents are mostly concentrated in this area, with additional clusters in the Waconia Township. White residents are also spread throughout the County at a lower rate of density. Carver County's very small Black population is clustered in Chanhassen and Chaska, with an additional density dot in Hamburg, the Benton Township, and the Dahlgren Township. Asian

residents are concentrated mainly in Chaska and Chanhassen as well, with just one density dot located outside of these cities in the San Francisco Township. Hispanic residents are almost exclusively concentrated in Chaska, with a few density dots in Chanhassen, and two others spread throughout the rest of the county in Waconia Township and the Dahlgren Township. There is just one density dot on the map representing American Indian/Alaska Native residents in Carver County, which is located in Chaska.

Map 16: National Origin, Region[3]



[3] *Source: Based on American Community Survey Estimates, 2013-2017. See Data Documentation for more information.*

In the region, the most common countries of origin for residents who were born outside of the United States are India, Mexico, Ethiopia, Somalia, and Laos. Residents from all countries are concentrated most heavily in the urban centers of Minneapolis and St. Paul (discussed in more detail below). Outside of these urban centers, there are distinct groupings of residents from other countries. Residents from India are concentrated most heavily in the western suburbs, such as Maple Grove, Plymouth, Eden Prairie, and Edina, as well as the southern suburb of Apple Valley. There are additional clusters in Blaine, Shoreview, Eagan, and Woodbury. Residents form Mexico are concentrated in the Northwest/North Central suburbs such as Crystal, Brooklyn Center, Fridley, Mounds View and Blaine, as well as south central/southeast suburbs such as Richfield, Bloomington, South St. Paul, and Burnsville. There are additional clusters in Shakopee, Chaska Chanhassen, Cottage Grove and far northwest into the Region like Dayton and Corcoran. Residents from Ethiopia are concentrated mainly on the eastern side of the Region, with concentrations in Burnsville and Savage, Coon Rapids, Oakdale, and Woodbury. Residents from Somalia are also mostly concentrated on the eastern half of the Region, with clusters in Woodbury, Eagan, Rosemont, and Blaine. There is an additional cluster in Hopkins. Finally, Residents from Laos are most heavily concentrated in the suburban center of the region, in the closer suburbs such as Plymouth and Maple Grove, St. Louis Park and Edina, Eden Prairie, Eagan, and Woodbury. There are smaller concentrations in Blaine, Mounds View/Shoreview, and Woodbury.

Anoka County

In Anoka County, the most common non-United States countries of origin are Mexico, India, Ethiopia, Liberia, and Vietnam. In the County, Mexican residents are concentrated most heavily in Fridley, Columbia Heights/Hilltop, and along the eastern half of Coon Rapids and across into the western half of Blaine. There is also a cluster of Mexican residents in the city of Lexington, as well as smaller clusters in northern Blaine, Southern Ramsey, and the city of Anoka. Indian residents are concentrated most heavily in northern Blaine, southern Spring Lake Park, Fridley, and Columbia Heights. Residents from Ethiopia are concentrated most heavily in Coon Rapids, Blaine, and Fridley. Anoka County residents from Liberia are located along the southwestern border of the County in the cities of Anoka, and Coon Rapids, with a smaller cluster in eastern Fridley. There are also some residents from Liberia farther out in the County, in the cities of Oak Grove, Ham Lake, and Andover, though these are very small populations. Finally, residents from Vietnam are concentrated most heavily in northern Blaine, Ramsey, and western Fridley.

Coon Rapids

In Coon Rapids, the most common non-United States countries of origin are China, Liberia, Mexico, Laos, and Maldova. Chinese residents are clustered in a roughly diagonal strip running from the corner of Coon Rapids that borders the city of Anoka, to the southeastern border of the city that abuts the city of Blaine. Though clustered in a line, there is not an area of significant dot density. Liberian residents are clustered most heavily in the northwest corner of Coon Rapids that borders Anoka, and the southeast corner of Coon Rapids that borders Blaine. There is a smaller cluster of Liberian residents in the direct center of the city, and a few density dots further north though they are less concentrated. Residents from Mexico are heavily concentrated in the same census tract located directly in the middle of the city. There is a smaller cluster of Mexican residents in the far southern corner tip of Coon Rapids, and another small cluster in the census tract that directly borders Blaine. Residents from Laos are clustered in the far southern tip of the city, the census tract in the northeast corner, and a census tract just to the west of the center of the

city. Finally, Moldovan residents are located almost exclusively along the southwestern border of Coon Rapids, in a long census tract that borders Champlin and Brooklyn Park, with a much smaller cluster in the southeast corner on the border of Blaine.

Dakota County

In Dakota County, the most common non-United States countries of origin are China, Liberia, Mexico, Laos, and Moldova. Residents from China are clustered most heavily in the northwestern part of the county, in West St. Paul, Eagan, Apple Valley, and Lakeville. Liberian residents are located in a very small cluster in Burnsville, with an additional small population in Farmington. Residents from Mexico have a much higher density in Dakota County. There are large concentrations in West St. Paul, South St. Paul, Eagan, Apple Valley, Lakeville, and Burnsville. In particular, the southwest corner of Burnsville is very heavily concentrated by residents from Mexico. There is an additional, though smaller cluster of Mexican residents in Hastings. While there are not any heavily concentrated areas of residents from Laos, the County's population is spread out across Lakeville, Burnsville, Apple Valley, Eagan, and Inver Grove heights. Residents from Moldova are spread throughout the County, with density dots in Rosemount, Burnsville, and as far south as the Castle Rock Township.

Hennepin County

In Hennepin County, the most common countries of origin other than the United States are Liberia, Mexico, India, Ethiopia, and Somalia. Residents from Liberia are most heavily concentrated in Brooklyn Park, with smaller concentrations in Brooklyn Center, and Minneapolis. There are very few Liberian residents beyond these areas, with a small cluster in the areas of Champlin and Maple Grove that border Brooklyn Park, much smaller clusters in Minnetonka and Bloomington. Residents from Mexico are most heavily concentrated in the far east portion of Hennepin County. The heaviest concentrations are in southern Minneapolis, Brooklyn Center and Brooklyn Park—spreading into Robbinsdale and Crystal, as well as Richfield and Bloomington. There are additional smaller concentrations in St. Louis Park, Plymouth, Hopkins, and Chanhassen. Indian residents are most densely populated in northern Minneapolis, Hopkins, and the area straddling the southeast corner of Edina and the southwest corner of Richfield. There is larger swath of residents from India spread across Plymouth and Maple Grove, and a less dense cluster in Eden Prairie. Ethiopian residents are concentrated most heavily in northern Minneapolis and across Brooklyn Park and Brooklyn Center. There are smaller clusters in Champlin, the southern corners of Minneapolis, Richfield, Bloomington, Eden Prairie, and Hopkins. Finally, Somali residents are most heavily concentrated in Minneapolis, with additional smaller clusters in Bloomington, Golden Valley/Robbinsdale, Hopkins, Chanhassen and Eden Prairie.

Bloomington

In Bloomington, the most common countries of origin outside of the United States are Mexico, Ethiopia, Somalia, Vietnam, and El Salvador. Residents from Mexico are dispersed throughout most of the city, with the most density occurring along northern border with Richfield. There are also significant clusters of Mexican residents in a far western census tract and towards the center. Residents from Ethiopia are concentrated most heavily in the four census tracts in the northeast tip of the city that borders Richfield and Fort Snelling. Residents from Somalia are concentrated along the border with Richfield, as well as a small cluster towards the center of Bloomington and an even smaller cluster in a northern census tract along the border with Edina. Residents from Vietnam are

clustered most heavily in the four census tracts directly south of Richfield, and in a northern census tract just across the border from Edina's southeast corner. Residents from El Salvador are clustered almost exclusively in the four census tracts directly south of Richfield, with just two density dots located elsewhere in the city. From this national origin map it appears that the census tracts south of Richfield contain the most dense and diverse concentration of residents from countries outside of the United States.

Eden Prairie

In Eden Prairie, the most common non-United States countries of origin are China, India, Ethiopia, Somalia, and Mexico. The national origin map for the city indicates that most residents across all countries listed above are concentrated in one census tract just east of the city's center. There are also census tracts that have distinct groupings of certain residents from different countries. Chinese residents are dispersed throughout the city, but with the most clustered in this east of center census tract and another census tract in the southwest corner. Residents from India are also most heavily concentrated in these same census tracts, with a smaller cluster along the border with Bloomington and in the northwest corner. Residents from Ethiopia appear to be exclusively concentrated in two census tracts on the far east side of Eden Prairie. Residents from Somalia are also clustered in these tracts, with an additional small cluster in the northwest corner of the city. Finally, residents from Mexico are almost exclusively concentrated in the aforementioned east of center census tract, with just a few density dots located throughout the rest of the city.

Minneapolis

The most common non-United States countries of origin in the city of Minneapolis are Ethiopia, Somalia, Mexico, Ecuador, and Laos. Residents from Ethiopia are concentrated most heavily in the top half of central Minneapolis, with a smaller cluster in the northwest and southwestern corners of the city. Somali residents are similarly concentrated heavily in central Minneapolis, with additional concentration in the northwest corner of the city and a smaller cluster in the northeast corner of the city. These areas of concentration correspond with the Cedar Riverside neighborhood. Residents from Mexico are concentrated mainly in the southern half of central Minneapolis, with additional concentration in the northwest corner of the city, and smaller clusters along the southern border of the city. Ecuadorian residents are concentrated most heavily in central Minneapolis and in the northeast corner of the city. Residents from Laos are heavily concentrated in the top half of central Minneapolis as well, with a smaller cluster in northwest Minneapolis. This national origin map indicates that groups of residents from other countries are largely segregated in certain areas of the city, and these groups correspond with the geographic segregation of US-born minority racial groups as well.

Minnetonka

In Minnetonka, the most common non-US countries of origin are Ethiopia, Russia, Ukraine, India, and Vietnam. With the exception of residents from India, most of these residents are dispersed throughout the city. Ethiopian residents are clustered along the eastern edge of the city closest to the inner-ring suburb of Hopkins and in the far southeast corner along the border of Edina. Russian residents are concentrated just south of the center of Minnetonka, with a smaller cluster in the northeast corner that borders St. Louis Park. Ukrainian residents are dispersed throughout the city, with clusters in the northeast corner of Minnetonka near St. Louis Park, the southwest corner near Sherwood, and the southeast corner near Edina. There is also a cluster of Ukrainian residents in

the same census tract just south of the center of Minnetonka that has the largest concentration of Russian residents. Indian residents are most heavily concentrated in the northwest corner of the city, with additional clusters in the southeast corner near Edina. Residents from Vietnam are clustered along the southeastern edge of the city that borders Hopkins.

Plymouth

In Plymouth, the most common non-United States countries of origin are China, India, Nigeria, Mexico and North Korea. Generally, most non-US born residents appear concentrated in the upper northwest corner of the city, with mixed clusters on the eastern border shared with New Hope and the southeastern corner. Chinese residents are clustered mainly in the northwest corner of Plymouth and in the southeast corner of Plymouth. Nigerian residents are also concentrated in the northwest corner of the city, with an addition cluster in the two census tracts on the edge of the city that borders New Hope. Mexican residents are relatively evenly dispersed throughout Plymouth, with clusters on the border near New Hope, and in the southeast corner of the city near the intersection of the Golden valley, St. Louis Park, and Minnetonka borders. Korean residents are clustered in the northwest corner of the city, with smaller clusters in the southwest corner, the southeast corner, and along the border of New Hope. Indian residents are concentrated most heavily in the upper northwest corner of the city, spreading down through the entire center of Plymouth. There is an additional smaller cluster along the eastern border with New Hope.

Ramsey County

In Ramsey County, the most common countries of origin for residents born outside of the United States are Laos, Thailand, Ethiopia, Mexico, and Somalia. The vast majority of these group residents are clustered in St. Paul, discussed in more detail below. Outside of the city of St. Paul, the national origin map for the County reflects distinct residential groupings of residents from certain countries. Residents from Laos are clustered mainly around the outer edges of St. Paul, in the cities of Maplewood, Roseville, Little Canada, and North St. Paul. There is an additional small cluster of residents from Laos in the northeastern city of White Bear Lake. There are also a few density dots (in this map, representing 10 people) that indicate a smaller grouping of residents from Laos spread out through the northwestern cities in the County such as New Brighton, Arden Hills, and Shoreview. Outside of St. Paul, Ramsey County residents from Thailand are most heavily concentrated directly north of St. Paul, in the southeastern corner of Roseville and in Maplewood. There is an additional, much smaller cluster of residents from Thailand in the upper northwest corner of the County, in the city of Mounds View. Outside of St. Paul, Ramsey County's Ethiopian residents are clustered in Roseville, northern Maplewood, along the eastern border of North St. Paul, southeast New Brighton, and in Mounds View. Residents from Mexico are clustered throughout the County. Beyond St. Paul, Mexican residents are most heavily concentrated in the southern half of New Brighton, with smaller clusters in northern Shoreview, southeastern Mounds View, and the southeast strip of Maplewood that borders Oakdale and Woodbury. The county's Somali residents are clustered almost exclusively in two areas just north of St. Paul, in Falcon Heights/southern Roseville, and in eastern Maplewood/North St. Paul.

St. Paul

The most common countries of origin for St. Paul residents born outside of the United States are Laos, Thailand, Ethiopia, Mexico, and Somalia. Residents from Laos are concentrated in the northern half of the city and moving east to the city's border. There is an additional set of clusters

of residents from Laos in the southern, central portion of the city and along the far southeastern edge of the city. St. Paul residents from Thailand are also clustered in the top half of the city, with the largest concentrations directly in the center, and another large concentration just west of the city's border. There are very few density dots representing Thai residents elsewhere in the city. Residents from Ethiopia are most heavily clustered in the southeastern corner of the city along the boarders of Mendota and Lilydale. There are additional clusters directly in the center of the city, and moving northeast. Residents from Mexico are concentrated in the northern half of the city, from border to border, with the largest concentration in the northeast corner of the city. There is also a concentration of Mexican residents in the southern, central part of St. Paul, just across the border from the city of West St. Paul. In addition, there is a smaller cluster along the southern border of St. Paul, across from the city of Lilydale. Residents from Somalia are concentrated in the northern, central part of the city, with additional, smaller concentrations in the northeast corner of the city and along the southeastern border.

The national origin map for the City indicates distinct grouping and residential patters of residents from other countries. In general, these residents are grouped in the northern half of the city starting directly in the center and moving eastward. There are additional groupings of two immigrant populations as well. For example, residents from Laos and Somali residents are clustered together in the southeastern tip of the city. Ethiopian and Mexican residents are grouped together in the far northeastern corner of the city. Additionally, the northwest corner of the city contains a grouping of residents from Laos and Thailand, as well as a grouping of residents from Laos and Mexico.

Washington County

The most common countries of origin for Washington County residents who were born outside of the United States are India, Laos, Mexico, China, and Korea. The national origin map for Washington County clearly illustrates that, with the exception of residents from Laos, residents from other countries are most heavily concentrated in Woodbury, discussed in more detail below. Outside of Woodbury, there is a cluster of residents from India in Stillwater, and just one additional density dot (in this map, representing 10 people) located in the northern city of Forest Lake. Residents from Laos are clustered most heavily in Oakdale—across the border from a large population of Laotian residents in St. Paul and Maplewood. There are a few density dots representing Laotian residents scattered throughout the rest of the county in small numbers, such as in the Denmark Township, West Lakeland Township, and Forest Lake. Outside of Woodbury, residents from Mexico are clustered most heavily just north and south of Woodbury in Oakdale and Cottage Grove, with smaller clusters in Lake Elmo, Scandia, and Stillwater. Outside of Woodbury, residents from China are concentrated in Stillwater, with just two density dots throughout the rest of the County in Forest Lake and Mahtomedi. Residents from Korea are most heavily concentrated in Woodbury, with a larger cluster in Hugo, and smaller clusters in Stillwater/Stillwater Township, West Lakeland Township, and Lake Elmo. Aside from Woodbury, Forest Lake, Cottage Grove, and Stillwater have the largest diversity of residents from different countries.

Woodbury

In Woodbury, the most common countries of origin for residents born outside of the United States are India, Mexico, China, Canada, and Ethiopia. Residents from India are the most clustered in the upper northwest corner of the city, along the borders of Maplewood and Oakdale. There are

additional clusters of Indian residents throughout the rest of the city as well. Residents from Mexico are clustered most heavily in the northwestern and southwestern corners of the city, with smaller clusters along the eastern border. There is a notable absence of residents from Mexico directly in the center of the city. Residents from China are clustered almost exclusively in a central strip running across the city from west to east. Residents from Canada are not heavily concentrated in one area of the city, but there is are more Canadians in the southwestern portion of the city. Finally, residents from Ethiopia are concentrated in the southwest section of Woodbury, and just north of the center of the city.

Scott County

In Scott County, the most common countries of origin for residents born outside of the United States are India, Mexico, Cambodia, Vietnam, and Somalia. The vast majority of these residents are concentrated in the northern tip of the county that includes Shakopee, Savage, and Prior Lake. Residents form India are concentrated most heavily in the eastern half of Shakopee and central Savage. There are a few additional density dots (in this map, representing 10 people) located in Spring Lake Township and Louisville Township. Mexican residents are concentrated most heavily in Shakopee, where there is a cluster in the northeast corner of the city as well as distribution throughout the entire city. There is an additional cluster of residents from Mexico in eastern Savage, along the Burnsville border. Cambodian residents are concentrated most heavily in Savage, with a large cluster in eastern Savage, and thorough distribution throughout the southern half of the city. There is an additional cluster of residents from Cambodia in southeastern Savage, spilling over into the northeastern tip of the Spring Lake Township and the northwestern tip of the Credit River Township. Finally, there are smaller clusters of Cambodian residents in the Sand Creek Township, Louisville Township, and northwestern Shakopee. Residents from Vietnam are most densely concentrated across central Savage, with thorough distribution throughout Shakopee and Prior Lake as well. There is an additional, rather small cluster of Vietnamese residents on the eastern side of the Sand Creek Township. Residents from Somalia are concentrated almost exclusively in northeastern Savage, and northwestern Shakopee, with a few additional density dots located in Sand Creek Township, and New Market Township.

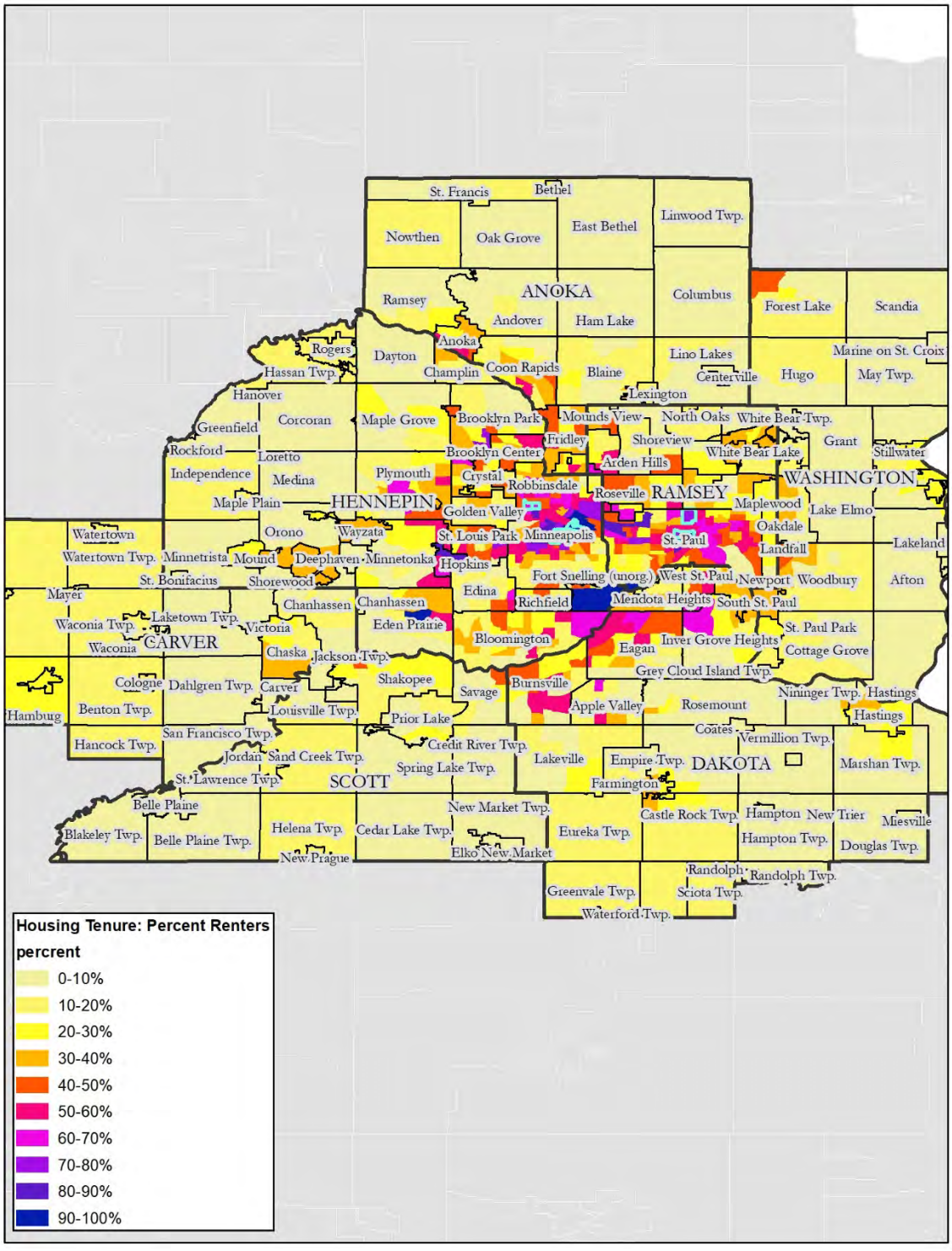
Carver County

In Carver County, the most common countries of origin for residents who were born outside of the United States are India, Mexico, Vietnam, Colombia, and Canada. The vast majority of these residents are located on the far east side of the County that are closest to the more populated suburbs and urban centers. Residents from India are exclusively concentrated in Chanhassen and northern Chaska, with just one additional density dot (in this map, representing 10 people) located anywhere else in the County. That dot is in the far northeast corner of the Laketown Township. Residents from Mexico are concentrated most heavily in southern Chaska, with additional clusters in northern Chaska and Chanhassen. There are additional density dots representing Mexican Residents spread sparingly throughout the county in Hancock Township, Laketown Township, Waconia Township, Camden Township, and Hollywood Township. Residents from Vietnam are concentrated most heavily in northern Chaska and Chanhassen, with one density dot in the San Francisco Township, one in the Dahlgren Township, and one in Waconia Township. Residents from Colombia are concentrated exclusively in central Chanhassen, with no additional density dots located throughout the County. Finally, residents from Canada are not heavily concentrated anywhere, but are clustered in Laketown Twonship, Chanhassen, along the southeastern County

border in San Francisco Township, and in the Dahlgren Township. There are additional density dots in Chaska, Waconia Township, and Watertown Township.

d. Consider and describe the location of owner and renter occupied housing in the jurisdiction and region in determining whether such housing is located in segregated or integrated areas, and describe trends over time.

Map 32: Housing Tenure, Region[4]



[4] *Source: Based on American Community Survey Estimates, 2013-2017.*

In the Region, the areas with the highest portion of renters are just south of Minneapolis and St. Paul near Richfield and Mendota Heights, and northern Minneapolis and St. Paul. There are additional pockets of high renter populations in Eden Prairie and Hopkins. Areas of the Region with relatively mixed renter/owner populations are mostly in the immediate, outer ring suburbs such as Golden Valley, Plymouth, and Brooklyn Center. There are additional pockets of mixed renter/owner populations in Eagan and Burnsville. The areas in the Region with the highest homeowner populations are the outer sections of the immediate suburbs, and the vast majority of the more rural parts of Dakota, Anoka, Carver, Scott, and Washington Counties. Generally, the areas with the highest concentrations of renters correspond to the areas of the Region that have the highest percentages of minority populations, and the areas with the highest rates of homeownership correspond to areas with the highest white populations.

Anoka County

The vast majority of Anoka County's geographic area is populated by heavy percentages of homeowners. In fact, there are no areas within the County that are more than 60% renters. The areas with the highest percentage of renters are in the 50%-60% range, and there are only four, very small areas of this kind throughout the entire county. These areas include the southern portion of Anoka along the Champlin border, the southern central part of Coon Rapids, a section of eastern Fridley along the Brooklyn Center border, and a very small section in Columbia Heights. Southeastern Anoka, southeastern Coon Rapids, and northern Fridley have areas where the renting population reaches 40-50% as well. There are also just five small areas of Anoka County where the population reaches 30-40%, and they are located largely in the same cities listed above: northern Anoka, central Coon Rapids, Spring Lake Park, southern Fridley, and Lexington. Aside from these small portions of the southern cities in the County, the remainder of Anoka County has homeownership rates ranging from 70-100%. Central Fridley, southeastern Ramsey, the eastern half of St. Patrick, the majority of Blaine, and the northwestern corner of Anoka, the northwestern corner of Lino Lakes, and entire city of Northern have renter populations between 20% and 30%. The entirety of Oak Grove East Bethel, Ham Lake, Columbus, and Linwood Township have renter populations that are 10% or less, as well as half of St. Patrick, and the majority of Ramsey, Andover, and Lino Lakes. Overall, renters are concentrated most heavily in the far southern cities in the county. The areas of Anoka County that have the highest percentage of renters correspond to southern and western areas where the County's minority group populations live. This does not necessarily indicate that a lack of high homeownership in this area contributes to segregation, as this is also the area where the majority of the County's population lives, irrespective of race.

Coon Rapids

The city of Coon Rapids does not have any areas that are more than 70% renter. The vast majority of the city has a strong majority of homeowners, with just one area that is more than 50% renters. This area is located just west of the southeastern tip of the city, along the border with Brooklyn Park. There is a small strip along the southeastern tip of the city, bordering Blaine that is 40-50% renter occupied, and a diagonal strip running from the center of the City to the far southeastern tip that is between 30% and 40% renter occupied. The remainder of the city has homeownership rates of 70% to 100%. The northeastern corner of Coon Rapids has the highest homeownership rates, with the percentage of renters being between 0 and 10%. The western half of the southern corner of the city, the northwestern corner, and a section along the eastern border of the city have renter

populations between just 10 and 50%. The remaining strip along the southern city border and the direct center of the city have homeownership rates between 70 and 80%. This map indicates that the majority of renters in the city are concentrated in the southeastern tip of the city, closest to Minneapolis and St. Paul that have much higher renter populations. While white residents are dispersed across the entire city, there are areas of lower homeownership rates that correspond with higher minority group populations, such as the central strip and the southeastern tip along the border. In addition, areas in the northern portion of Coon Rapids with higher homeownership rates correspond to areas of the city with much smaller minority populations.

Dakota County

The vast majority of Dakota County is populated by homeowners. Throughout the entire county, there are no portions where the percentage of renters is more than 70%, and just a few where the percentage is greater than 60%. Of the renting population in Dakota County, the largest populations are concentrated in the northwest tip, closest to St. Paul and the immediate suburbs of Minneapolis. The highest renter populations occur in Eagan, Burnsville, Apple Valley, West St. Paul, and Inver Grove Heights. A small section in northern Apple Valley, a small section in northern Eagan, the northeast corner of Inver Grove Heights and the city of Sunfish lake all have rental populations between 60and 70%. Central and eastern Burnsville, a small southern section of Apple Valley, a small section and the northeast corner of Eagan, and the eastern third of West St. Paul have renter populations between 50 and 60%. Northwest Burnsville, southwest and northeast Eagan, and the central third of West St. Paul have renter populations between 40 and 50%. The remaining higher percentages of renters (between 30 and 40%) are in small patches through the northern county, with an additional patch straddling the border of Farmington and Castle Rock Township and a patch straddling the border of Hastings and Niminger Township. The more rural areas of Dakota County correspond with higher levels of homeownership. The entirety of Eureka township, Greenvale Township, Waterford Township and Sciota Township have home ownership population between 80 and 90%. The entirety of Randolve Township, Hampton Township, Douglas Township, Miesville, Ravenna, Vermillion, and Coates populations of 90 to 100%. The remainder of the county has patches of slightly lower homeownership rates, but remain between 70 and 100%. The areas in Eagan, Apple Valley, and Burnsville that have higher percentages of renters correspond strongly with the areas of these cities that have concentrations of Black, Asian, and Hispanic residents, particularly along the border of Bloomington.

Hennepin County

Hennepin County contains the full range of areas of very high and very low homeownership. The areas with the lowest rates of home ownership are in Minneapolis (discussed in more detail below). Outside of Minneapolis, a small section of Eden Prairie, and eastern Richfield near Fort Snelling are all areas where 90 to 100% of the population are renters. Northern Hopkins is an area of 80-90% renters, and southeastern Brooklyn Park contains an area of 70-80% renters. There are also several sections of greater Hennepin County that are between 50 and 70% renters. These areas include eastern Minnetonka, southeastern Edina, eastern Bloomington, Brooklyn Center, central Plymouth, and New Hope. There are several sections with a percentage of renters between 30 and 40%, including western Brooklyn Park, northern Champlin, Wayzata, Minnetonka Beach, Tonka Bay, northeaster Eden prairie, central and eastern Bloomington, northern Golden Valley, Plymouth, New Hope, and Crystal. The remainder of the county has homeownership rates between 80 and 100%. The entire cities of Dayton, Corcoran, Medina, Greenfield, Orono, Minnetrista, and

St. Bonafacious all have homeownership rates between 90 and 100%. The entire cities of Independence, Rogers and Hassan Township have homeownership rates between 80 and 90%. The remainder of the outer lying cities, with the exception of small sections already mentioned, have a mix of the two. The areas in the county with the highest levels of homeownership correspond with areas with the highest white populations, with the highest concentrations of renters being in areas that correspond to high minority group populations such as northern and central Minneapolis and Brooklyn Center.

Bloomington

Bloomington has a very moderate mix of renters and homeowners, with just one area of the city with a renting population of between 60 and 70%. This section is located on the far eastern tip of Bloomington, just south of Fort Snelling. This section corresponds very heavily with the area of Bloomington that has the highest concentration of Black, Hispanic, and Asian residents. There are no areas of the city where renters are more than 70%. Just to the west of this area, there are three patches of the city that have renting rates between 50 and 60%. These areas correspond to areas of Bloomington with noticeable clusters of Black, Hispanic, and Asian residents. The remainder of the city has homeownership rates between 70 and 80%. The highest rates of homeownership occur in the central area along the southern border. This area has rates between 90 to 100% homeownership, and has a low population of people of color.

Eden Prairie

Eden Prairie has a very noticeable dichotomy of areas with extremely high renter populations and areas of extremely high homeownership populations. The census tract directly east of center has a renting population of between 90 and 100%. This is also the most diverse census tract in the city, as it is the area with the highest concentration of Black, Asian, and Latino residents. The census tract directly east of this tract, has the second highest renter population in the city, between 60 and 70%. This tract corresponds to the second most concentrated area of the city for people of color. The northwest corner of the city has a renting population of between 40 and 50%, and this area is the third most concentrated area of the city for people of color. The remaining western three quarters of the city have homeownership rates of between 70 and 100%, with the highest rates being along the eastern and southern borders. These areas are also significantly less populated by residents of color.

Minneapolis

Minneapolis has an interesting mix of renters and homeowners, especially when considered in relation to race and ethnicity. Though there are more typical patterns present, such as areas of the city that have higher renter populations having higher populations of people of color, there are also areas of the city that seem to indicate higher than usual levels of homeownership among minority groups. The areas of the city with the highest renter populations are in central Minneapolis, and just southwest and northeast of central Minneapolis. While this area does correspond to areas with high populations of Black, Latino, and Asian residents such as Cedar Riverside, this area is also populated by renting students of the University of Minnesota, as well as wealthier and whiter renting populations such as North Loop, Uptown, and Downtown West. The areas of the city with the second highest levels of renters is in the northwest corner. This area ranges from 30 to 70% renters. While this area is populated by larger populations of people of color, particularly Black residents, this map indicates larger populations of people of color who are homeowners as well.

The highest rates of homeownership are located across the southern areas of the city, from the Powderhorn neighborhood and down into Tangletown and Nokomis. The majority of this neighborhood has homeownership rates of between 70 and 100%. Within this section of the city, there are a few census tracts where the population is between 40 and 50% renters. These tracts correspond to areas of this section with higher populations of Black, Hispanics, and Asian residents. The far northeast tip of Minneapolis, adjacent to St. Anthon, also has high homeownership rates between 70 and 100%.

Minnetonka

Minnetonka quite literally only has areas of extremely high homeownership or extremely high rentership. The entire eastern border of the city, which surrounds Hopkins and is closest to Minneapolis' immediate western suburbs, has renters making up between 60 and 70% of the population. This area surrounds a portion of Hopkins that has renters making up 60 to 90% of the population. These areas of Minnetonka correspond directly to the areas where the city's Black and Asian residents are the most concentrated. The remainder of the city has nearly opposite percentages, with homeownership rates ranging from 70 to 100%. These areas are the same places with a much smaller population of people of color.

Plymouth

The majority of the city of Plymouth are homeowners, with zero areas of the city that are more than 70% renters. The census tract directly in the center of Plymouth has the highest amount of renters in the city, between 60 and 70%. While this area does correspond with a cluster of Asian residents, this is not the census tract that is most heavily populated by residents of color. Directly east and west of this tract and in the far southeast corner, are census tracts that are 30 to 40% and 40 to 50% renters, respectively. These tracts do have a concentration of Black, Hispanic, and Asian renters. The remainder of the city has homeownership rates ranging from 70 to 100%. The far southwestern and northeaster corners of the city have homeownership rates of 70 to 80%. The northeast corner is noticeably white, while the southwestern corner does contain clusters of Asian and Black residents. Interestingly, the northwest corner of the city has homeownership rates of between 80 and 90%. This tract also has the largest concentration of Black and Latino residents in the entire city, indicating that this tract perhaps has larger amounts of affluent households of color.

Ramsey County

Compared to Hennepin Count, Ramsey County's renting population is similarly concentrated in the urban center of St. Paul, but there are much fewer areas of heavy renting populations farther out in the county. Ramsey County also has fewer residents of color farther out from its urban center of St. Paul than Hennepin County does. Outside of St. Paul, which will be discussed individually below, there are just two small areas of Ramsey County where the percentage of renters is higher than 60%. These areas are the northeast corner of Falcon Heights and the northern portion of St. Anthony that is included in the County limits, though neither correspond heavily to concentrations of residents of color. In addition, aside from St. Paul, there are just two areas of Ramsey County that where the percentage of renters is higher than 50%. These areas include southeastern New Brighton, and the far southeastern corner of Roseville. These areas do correspond to clusters of Black, Asian and Hispanic residents in New Brighton, and Black and Asian residents in Roseville. There are two areas in the greater county that have a percentage of renters between 40 and 50%. These include the southern half of Shoreview, and the northwestern corner of Roseville. In

Shoreview, this corresponds to a small cluster of Asian residents. In Roseville, there is not a corresponding concentration of residents of color.

The remainder of the county has homeownership rates ranging from 60 to 100%. On the 60 to 70% end are areas including central Roseville, Little Canada, southwestern and northeastern Maplewood, Gem Lake, White Bear Township, and northern White Bear Lake. In Shoreview, this corresponds to a cluster of Asian residents. Areas of the Ramsey County with homeownership rates ranging from 70 to 80% include eastern New Brighton, southwestern and northeastern Roseville, western Little Canada, southern Vadnais Heights, most of North St. Paul, and the majority of southern Maplewood. The noted section of Maplewood corresponds to a concentration of Asian residents, perhaps reflecting increased homeownership within that community. The remainder of Ramsey County, including southern Arden Hills, northern Shoreview and Vadnais Heights, northeastern and southeastern Maplewood, and northern White Bear Township have virtually no renters, with homeownership rates ranging between 90 and 1005. These areas correspond to areas that have smaller populations of people of color.

St. Paul

The city of St. Paul has low levels of homeownership compared to the rest of the region, even compared to it's urban counterpart Minneapolis. Similar to Minneapolis, there are areas of the city that are almost entirely renter populations. These areas are directly in the middle of the city, and along the southwestern strip extending from Fort Snelling. Of the four small census tracts in the center of the city, two are between 90 and 100% renters, one is 80 to 90% renters, and the other is 70 to 80 percent renters. Of note, however, is that the two census tracts with the highest rate of renters not only do not correspond to a tract of people of color, but they are not densely populated at all. The other two tracts, however, do correspond heavily with a very low white population and a densely concentrated Black and Asian population. The strip along the southeastern corner of the city likewise is made up of 90 to 100% renters, and it also corresponds to a concentration of mainly Black residents, and very few white residents. In the northwest corner of the city there is an additional tract that is 70 to 80% renters. The western side of this tract is not densely populated at all and is a mix of white and minority residents, the eastern side of the tract is densely populated and reflects a mostly white renting population.

Moving outward from the center, the rates of homeownership increase. On the northern and eastern side of the city, homeownership rates range from 30% to 70%. The area on the map that appears to indicate homeownership rates of between 90 and 100% is not populated, as it includes the Airport, the Mississippi, Pigs Eye Lake, and a park. Residents of color are concentrated directly north of downtown and moving eastward. Immediately north of downtown the renter population makes up roughly 50 to 60%. North of that, the rate of rentership goes up to 60 to 70%. Moving East, the rentership starts at roughly 50 to 60%, increases to 60 to 70%, then decreases moving outward, with additional pockets of higher rentership. The areas directly north of downtown correspond with low white populations and densely concentrated Black and Asian populations, indicating that the majority of these Black and Asian residents are renters. Moving east however, the population is still an area of Black, Asian, and Hispanic concentration, but also varying levels of homeownership.

Washington County
In Washington County, there are extremely high homeownership rates. In fact, there are only six small patches of the county where renters make up more than 50% of the population. With the exception of the northwestern corner of Forest Lake, all of these areas are along the western border of the county that is adjacent to Maplewood and the rest of eastern Ramsey County. In Northwestern Forest Lake, Northwestern Woodbury, and a small patch of Southern Oakdale have renters that make up 40 to 50% of the population. These are the highest rates of rentership in the entire County. Northern Oakdale, central Oakdale, and parts of Woodbury have rentership rates between 30 and 40%. Stillwater, Oak Park Heights, and Bayport have rentership rates between 20 and 30%. The entire remainder of the county has a population that is between 80 and 100% homeowners. The only area of the county where a high renting population correlates with a high concentration of residents of color is in southern Oakdale. In fact, Cottage Grove has a concentration of Black and Asian residents and very high homeownership rates.

Woodbury
In Woodbury, the overwhelming majority of residents are homeowners. With the exception of the upper northwestern corner, the remainder of the city has homeownership rates between 80 and 100%. In the upper northwest corner, renters make up between 40 and 50% of the population. Just southeast and southwest of that corner, renters make up between 30 and 40% of the population. These areas roughly correspond to a cluster of Black, Asian, and Hispanic residents. The highest homeownership rates occur towards the center of the city, where 90 to 100% of residents are homeowners. These areas also correspond to higher concentrations of Black, Asian, and Hispanic residents, suggesting higher homeownership among these populations than may occur elsewhere in the Region.

Scott County
The vast majority of households in Scott County own their homes. There is just one area of the county where renters make up more than 30% of the population. This section is in the northeast corner of Shakopee. This area corresponds to a concentration of Black, Asian and Latino residents. Northern Shakopee as a whole, southern Prior Lake, and eastern Savage have populations where renters make up 20 to 30%. These areas correspond to the remainder of the concentrations of Scott County's minority group population. The entirety of sand Creek Township, Jordan, and Helena Township have homeownership rates between 80 and 90%. The remaining portions of the county have virtually no renters, with homeowners making up 90 to 100% of the population.

Carver County
The majority of Carver County has homeownership rates between 70 and 100%. There are no areas of the county where renters make up more than 40 percent of the population, and just one area where renters make up more than 30%. This area is in southern Chaska, which corresponds to the largest concentration of the County's Asian and Hispanic population. There are also clusters of minority group residents in northern Chanhassen, though this area has homeownership rates between 80 and 100%, potentially indicating higher homeownership rates among these groups. Aside from Chaska and Chanhassen, homeownership rates decrease moving west. The entirety of Victoria, Carver, Laketown Township, Dahlgren Township, San Francisco Township, and the southeastern corner of Waconia/Waconia Township have homeownership rates between 90 and 100%. The entirety of Watertown/Watertown Township, Benton Township, Cologne, Hancock

Township, Hollywood Township, Myer, New Germany, and Camden Township have homeownership rates between 80 and 90%. Finally, the far southwestern corner of the county that includes Norwood Young American, Young America Township, and Hamburg have homeownership rates between 70 and 80%. These areas of Carver County are almost exclusively white.

Additional Information

Beyond the HUD-provided data, provide additional relevant information, if any, about segregation in the jurisdiction and region affecting groups with other protected characteristics.

HUD does not provide and the Census Bureau does not collect data concerning religious affiliation, but religion remains a prohibited basis for discrimination under the Fair Housing Act. Although the data discussed above with respect to national origin and LEP status can provide some insight into residential patterns with respect to religious given correlations between language, national origin, and religion, the resulting picture is merely a rough proxy. It is also a proxy that does not genuinely capture minority religious communities whose members are less likely to be recent immigrants.

A 2014 Religious Landscape Study conducted by the Pew Research Center found that adults in the Minneapolis/St. Paul Metro Area are 70% Christian. Within Christianity, roughly 15% are Evangelical Protestant, 27% are Mainline Protestant, 4% are Historically Black Protestant, and 21% were Catholic. Less than 1% of the population identified as one of the many other Christian denominations. Those with non-Christian faith identities made up 5% of the population. Jewish and Muslim residents are roughly 1%, while Muslim and Hindu residents comprise less than 1% of the population. 28% of adults in the Metro Area identified as unaffiliated with a religion.

<u>Contributing Factors of Segregation</u>

Consider the listed factors and any other factors affecting the jurisdiction and Region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of segregation.

Please see the Appendix for the following Contributing Factors to Segregation:

- Community opposition
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific, neighborhoods, including services and amenities
- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location and type of affordable housing
- Loss of affordable housing
- Occupancy codes and restrictions
- Private discrimination

- Source of income discrimination
- Lack of public investment in specific, neighborhoods, including services and amenities

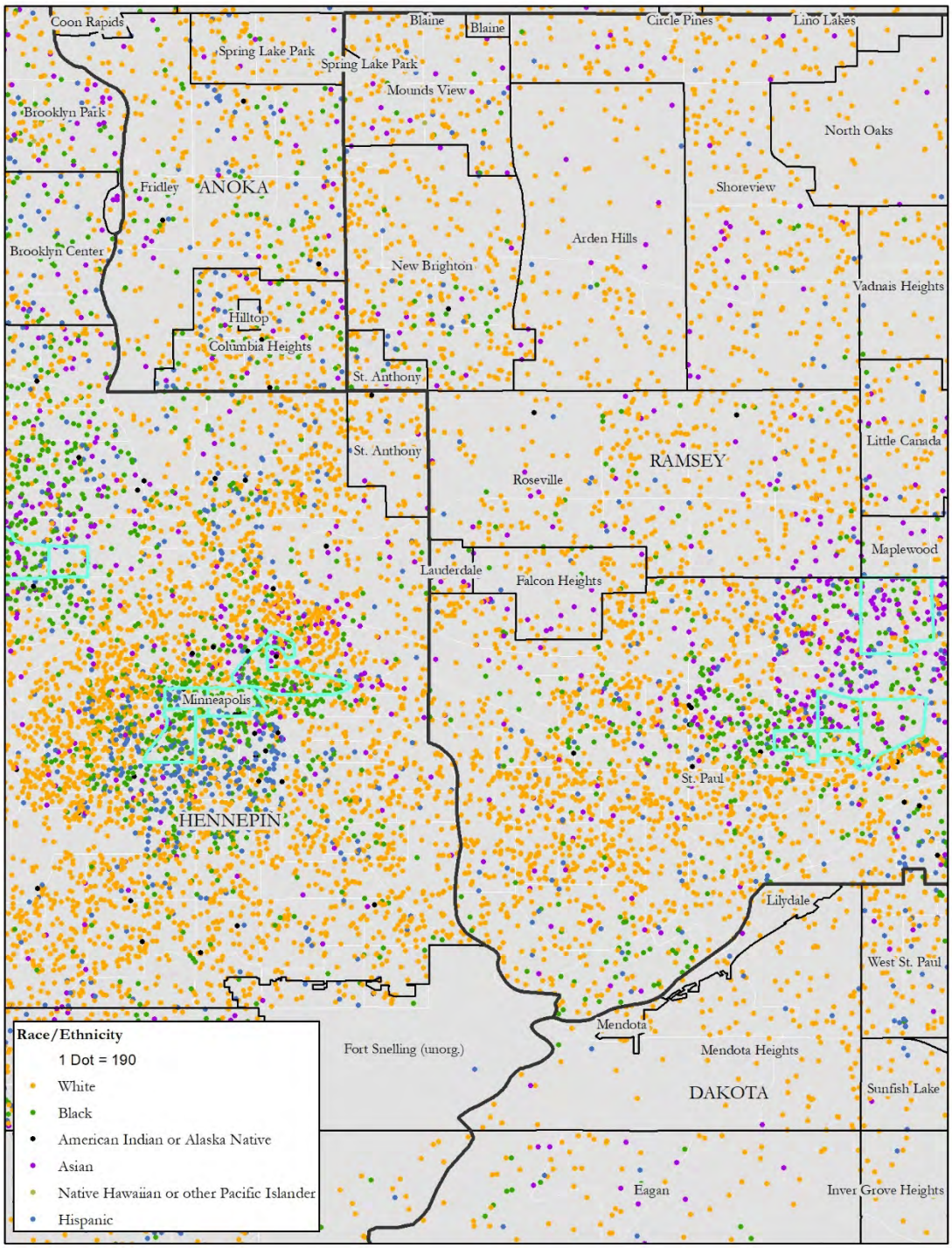
ii. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

R/ECAPs are geographic areas with significant concentrations of poverty and minority populations. HUD has developed a census-tract based definition of R/ECAPs. In terms of racial or ethnic concentration, R/ECAPs are areas with a non-White population of 50 percent or more. With regards to poverty, R/ECAPs are census tracts in which 40 percent or more of individuals are living at or below the poverty limit or that have a poverty rate three times the average poverty rate for the metropolitan area, whichever threshold is lower.

Where one lives has a substantial effect on mental and physical health, education, crime levels, and economic opportunity. Urban areas that are more residentially segregated by race and income tend to have lower levels of upward economic mobility than other areas. Research has found that racial inequality is thus amplified by residential segregation. Concentrated poverty is also associated with higher crime rates and worse health outcomes. However, these areas may also offer some opportunities as well. Individuals may actively choose to settle in neighborhoods containing R/ECAPs due to proximity to job centers and access to public services. Ethnic enclaves in particular may help immigrants build a sense of community and adapt to life in the U.S. The businesses, social networks, and institutions in ethnic enclaves may help immigrants preserve their cultural identities while providing a variety of services that allow them to establish themselves in their new homes. Overall, identifying R/ECAPs is important in order to better understand entrenched patterns of segregation and poverty.

a. Identify any R/ECAPs or groupings of R/ECAP tracts within the jurisdiction and Region.

Map 1: R/ECAPs in Twin Cities Region[5]



[5] *Source: Based on American Community Survey Estimates 2013-2017; see Data Documentation for more information.*

b. *Describe and identify the predominant protected classes residing in R/ECAPs in the jurisdiction and Region. How do these demographics of the R/ECAPs compare with the demographics of the jurisdiction and Region?*

Table 1 - R/ECAP Demographics			
	Minneapolis and St. Paul		
R/ECAP Race/Ethnicity		**#**	**%**
Total Population in R/ECAPs		36,222	100%
White, Non-Hispanic		7,595	20.97%
Black, Non-Hispanic		16,497	45.54%
Hispanic		4,022	11.10%
Asian or Pacific Islander, Non-Hispanic		6,857	18.93%
Native American, Non-Hispanic		513	1.42%
R/ECAP Family Type			
Total Families in R/ECAPs		5883	
Families with children		3830	65.10%
R/ECAP National Origin			
Total Population in R/ECAPs			
#1 country of origin	Somalia	3,705	26.38%
#2 country of origin	Ethiopia	2,449	17.43%
#3 country of origin	Mexico	936	6.66%
#4 country of origin	Thailand	901	6.41%
#5 country of origin	Laos	830	5.91%
#6 country of origin	Burma	765	5.45%
#7 country of origin	Other Eastern Africa	476	3.39%
#8 country of origin	Vietnam	372	2.65%
#9 country of origin	Korea	329	2.34%
#10 country of origin	Iraq	326	2.32%
Note 1: 10 most populous groups at the jurisdiction level may not be the same as the 10 most populous at the Region level, and are thus labeled separately.			

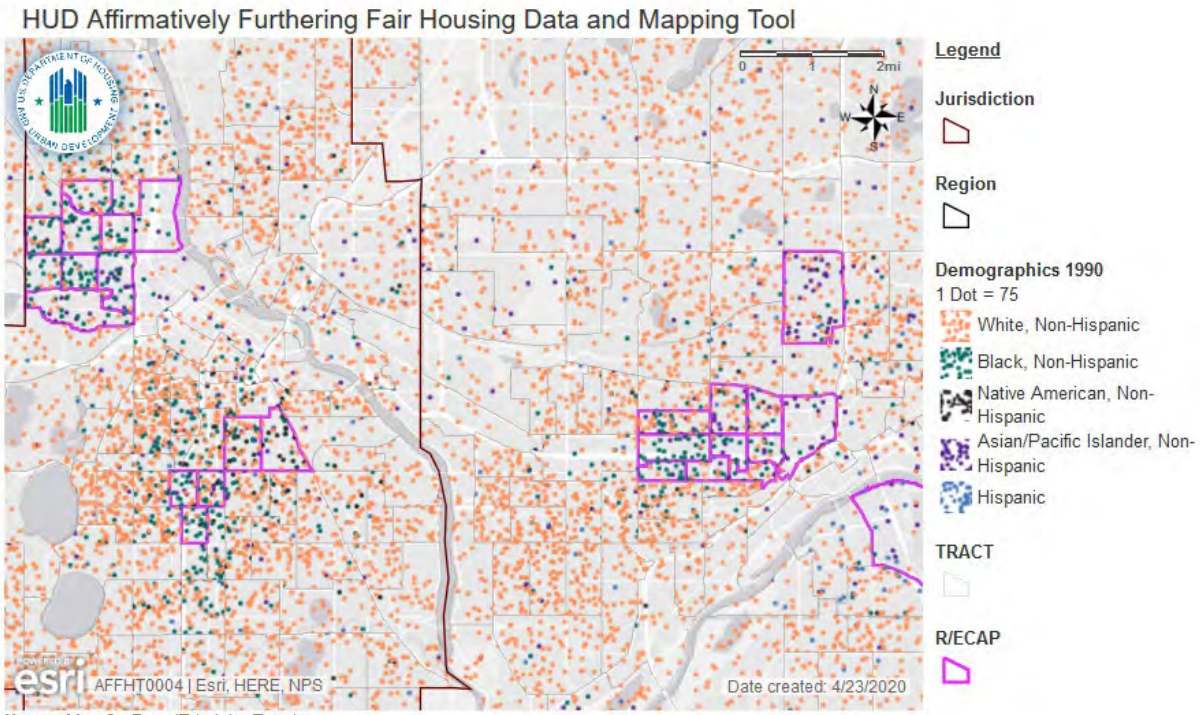
Sources: Decennial Census; American Community Survey 2013-2017 Estimates

The R/ECAPs in the Region have a total population of 36,222. Of those, 7,595 residents or 20.97% are White, 16,497 or 45.54% are Black, 4,022 or 11.10% are Hispanic, 6,857 or 18.93% are Asian or Pacific Islander and 513 or 1.42% are Native American. 65.10% of families are families with children. The most common national origins of residents in the neighborhoods are Somalia at

26.38%, Ethiopia at 17.43%, Mexico, Thailand, Laos, Burma, Other Eastern Africa, Korea and Iraq.

c. *Describe how R/ECAPs have changed over time in the jurisdiction and the Region (since 1990).*

Map 2: R/ECAPs 1990, Twin Cities Region



Name: Map 2 - Race/Ethnicity Trends

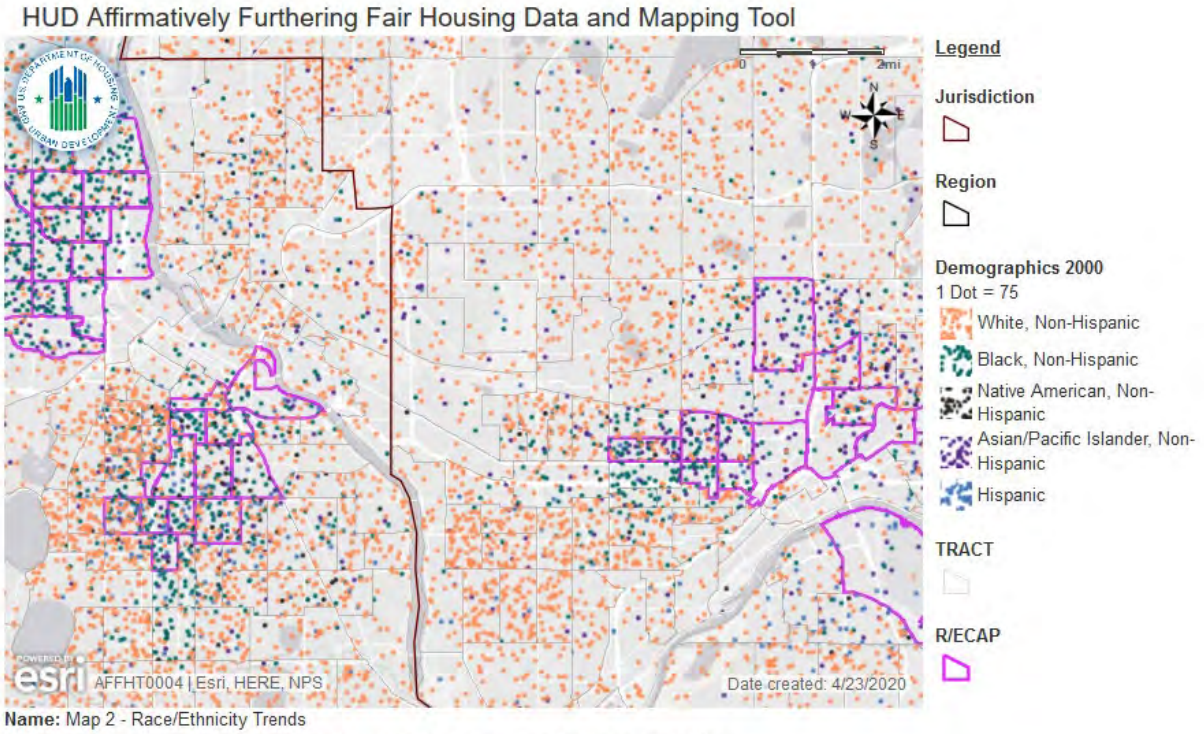
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Minneapolis (CDBG, HOME, ESG)

Region: Minneapolis-St. Paul-Bloomington, MN-WI

HUD-Provided Data Version: AFFHT0004

Map 3: R/ECAPs 2000, Twin Cities Region



Name: Map 2 - Race/Ethnicity Trends

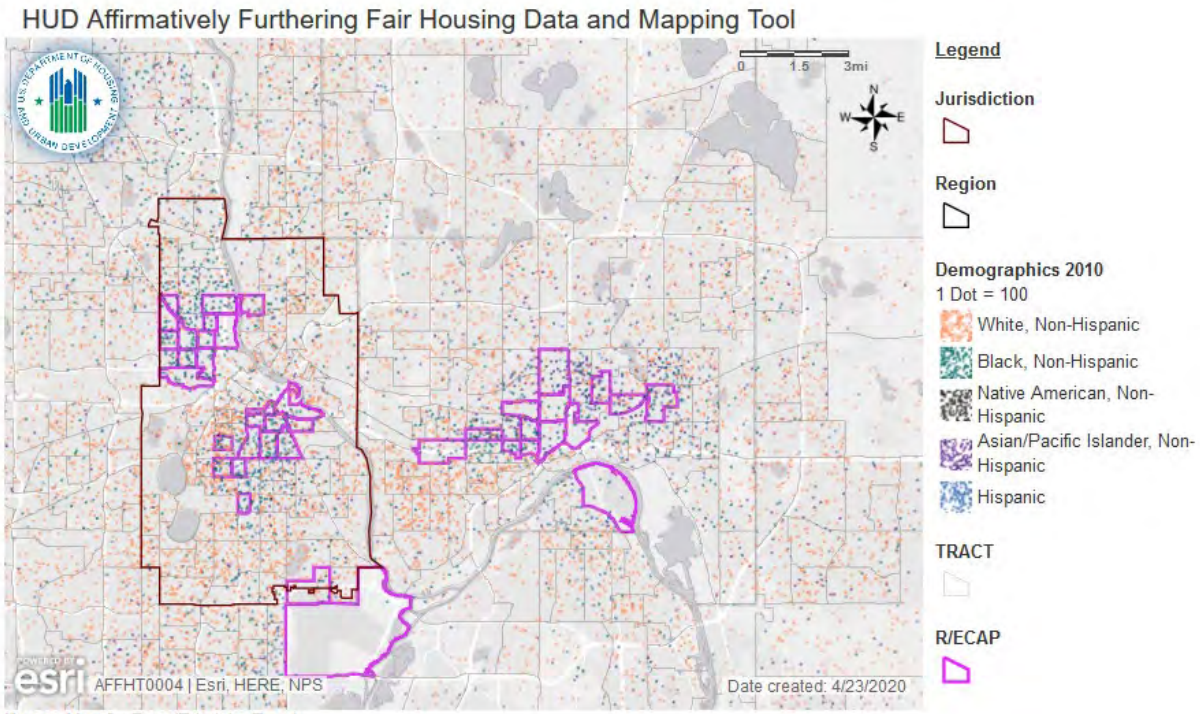
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs

Jurisdiction: Minneapolis (CDBG, HOME, ESG)

Region: Minneapolis-St. Paul-Bloomington, MN-WI

HUD-Provided Data Version: AFFHT0004

Map 4: R/ECAPs 2010, Twin Cities Region



Name: Map 2 - Race/Ethnicity Trends
Description: Past race/ethnicity dot density map for Jurisdiction and Region with R/ECAPs
Jurisdiction: Minneapolis (CDBG, HOME, ESG)
Region: Minneapolis-St. Paul-Bloomington, MN-WI
HUD-Provided Data Version: AFFHT0004

All eleven R/ECAPs in the Twin Cities Region can be found in either Minneapolis (Hennepin County) or in St. Paul (Ramsey County). Four R/ECAPs in Minneapolis are primarily located in the center of the city, in the area stretching from Route 65 to the Upper Mississippi River. Two R/ECAPs are additionally found closer to the northwest area of the City. These neighborhoods are also composed mostly of Black or Hispanic residents, with more Hispanic residents being found along Route 65 and Black residents in the neighborhood along the Upper Mississippi, by Augsburg College. The presence of the college in that neighborhood may indicate that the neighborhood is not a true R/ECAP.

In St. Paul, R/ECAPs are similarly located in the center of the City, especially in the neighborhoods along St. Anthony Ave and along Interstate 35 East. These areas are primarily composed of Black and some Asian residents, with Asian residents found especially in the area stretching between Oakland Cemetery and Rice Arlington Field.

The trend maps show a dramatic decrease in the R/ECAPs in the Region over the course of thirty years. In 1990, more R/ECAPs existed in all the neighborhoods they are found today, especially in the northwest area of Minneapolis. These R/ECAPs were primarily composed of Black residents in Northwest Minneapolis, Black or Native American residents in central Minneapolis, and Black or Asian residents in St. Paul. The number of R/ECAPs in these areas rose in 2000, then stayed

the same in 2010. In the present day, however, the number of R/ECAPs in the Region is shrinking. The cluster of R/ECAPs in northwest Minneapolis now only has two R/ECAPs. The number of Hispanic residents in these tracts has grown over time. While the number of White residents has increased in these neighborhoods, especially in northwest Minneapolis, these tracts remain majority non-White, suggesting that areas have stopped being R/ECAPs due to lowering poverty rates.

Contributing Factors of R/ECAPs

Consider the listed factors and any other factors affecting the jurisdiction and Region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of R/ECAPs.

Please see the Appendix for the following Contributing Factors to R/ECAPs:

- Community opposition
- Deteriorated and abandoned properties
- Displacement of residents due to economic pressures
- Lack of community revitalization strategies
- Lack of local or regional cooperation
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Location and type of affordable housing
- Loss of affordable housing
- Occupancy codes and restrictions
- Private discrimination
- Source of income discrimination

iii. Disparities in Access to Opportunity

The following section describes locational differences and disparities experienced by different groups in accessing key features of opportunity: educational quality, jobs, transportation, and environmental health. Access to neighborhoods with high levels of opportunity is made more difficult due to discrimination and the lack of a sufficient range and supply of housing in such neighborhoods. In addition, the continuing legacy of discrimination and segregation can decrease the availability of quality infrastructure, educational resources, environmental protections, and good jobs, all of which can create disparities in access to opportunity. Please see the Data Documentation Appendix for more information on how these index values were calculated.

1. Educational Opportunities

For many low-income families of color, housing and education are inextricably linked. When families are relegated to segregated, low-opportunity areas, they are more likely to be farther away from high-performing schools with resources to help their children succeed. This section provides an overlapping analysis of where different racial/ethnic groups live and how that affects their ability to access proficient schools throughout the Twin Cities Region, Anoka County, Coon Rapids, Dakota County, Hennepin County, Bloomington, Eden Prairie, Minneapolis, Minnetonka, Plymouth, Ramsey County, St. Paul, Washington County, Woodbury, Scott County, and Carver County.

The analysis in this section is based a visual representation of a combination of data sources. First, we calculated the School Proficiency Index for the Region and all jurisdictions in this analysis. The School Proficiency Index compares the 4th grade test scores of elementary schools to the neighborhoods they live in or near to block-group level census data to determine which neighborhoods have access to proficient schools. Values range from 0 to 100, where a higher score represents access higher quality school systems. This data is then broken down by race and ethnicity. The maps for this section therefore include tract level data for each jurisdiction, an overlay of shading to indicate the School Proficiency Index Value, and an overlay of dot density data for race and national origin. This mapping allows us to illustrate which races and residents from different countries have the highest or lowest access to proficient schools. An important note, which is explained further in the Data Documentation, is that since test scores were broken down by school district, which often encompassed the entirety of a jurisdiction, some index values were the same across race/ethnicity for a jurisdiction.

1. *For the protected class group(s) HUD has provided data, describe any disparities in access to education in the jurisdiction and region.*

2. *For the protected class group(s) HUD has provided data, describe how the disparities in access to education relate to residential living patterns in the jurisdiction and region.*

Region

The areas of the Region with the highest access to proficient schools are in central and southwestern Hennepin County, followed roughly by western, eastern, and southern borders of the

county. The areas of the county with the lowest access to proficient schools are in the center of the region, in Minneapolis, St. Paul, and the suburbs immediately north and south of Minneapolis.

Anoka County

School Proficiency Index data for Anoka County displays a significant mix of access to proficient schools, though the majority of the county has high Index Values. On the lower end of the spectrum, are Fridley, Columbia Heights, and Hilltop to the far south, as well as northwestern Ramsey and the western half of the city of Nowthen. Hilltop and Columbia Heights have School Proficiency Index values between 18 and 30. Hilltop and Columbia Heights have concentrations of Black, Asian, and Hispanic residents, as well as residents from Mexico, India, and Ethiopia. Fridley also has a concentration of Mexican and Indian residents. This would indicate that these residents of color have much lower access to proficient schools than the remainder of Anoka County residents. The areas of Ramsey and Nowthen also have index values between 18 and 30. These areas are overwhelmingly white and not densely populated, though there is a very small cluster of Mexican residents (roughly 30 people) in western Nowthen.

Central Blaine, Spring Lake Park, Columbus, Linwood Township, and northern Lino Lakes have School Proficient index Values between 40 and 50. It is unclear why this strip of Blaine has lower Values than the remainder of the city. While this area of Blaine does not correspond to clusters of certain races, it does include clusters of Indian, Mexican, and Vietnamese residents, indicating that residents of a different national origin may have less access to proficient schools in this area. The low index values for the more remote cities of Anoka County are rural and almost entirely populated by white populations.

The areas of the county with the highest access to proficient schools are the eastern third of Blaine, and the majority of Lexington, Circle Pines, and Lino Lakes. While this section of Blaine does have clusters of Black and Asian residents as well as residents from Vietnam, India, and Mexico, the remainder of this area is overwhelmingly white, indicating that of the residents of Anoka County with the most access to proficient schools, the remainder of them are white. The remainder of the county has moderately high proficient access to schools, with values between 60 and 70. Though the remainder of Anoka County is very white, this area includes Coon Rapids, the city of Anoka, and Western Blaine, all of which have concentrations of Black, Asian, and Hispanic residents, as well as residents from India, Mexico, Ethiopia, and Liberia. This indicates that in these areas access to proficient schools is not negatively correlated to race or national origin.

Coon Rapids

The entirety of the city of Coon Rapids has School Proficiency Index values between 60 and 70, indicating that the entire city has relatively high access to proficient schools, and there are no disparities in that access based on race or national origin.

Dakota County

Dakota County has generally high access to proficient schools across the board, with the highest access occurring in western Dakota County, and the least access occurring in the farthest south areas of the county. Of the areas with the highest population density, Lakeville and eastern Eureka Township have the highest School Proficiency Index Values, between 70 and 80. Lakeville is predominately white, though it does have clusters of Hispanic and Asian residents, as well as a

heavy concentration of residents from Mexico, and clusters of residents from Laos and China. Eureka Township is predominately white, with demographic maps not reflecting immigrant populations or minority group residents. Greenville Township, Northfield, Waterford Township, southern Sciota Township, and southern Douglas Township have the lowest School Proficiency Index Values, between 18 and 20. This area is overwhelmingly white and sparsely populated.

The northern borders of the county have low to moderate School Proficiency Index Scores. While they are not high, they are also not the lowest. South St. Paul, and West St. Paul have index scores between 40 and 50. Northern and western Burnsville have Index scores between 50 and 60. These areas correspond to the Dakota County's biggest concentrations of minority and immigrant populations. The remainder of the county has index values between 60 and 70, indicating that the more remote cities and townships, with the exception of farthest south, have the highest access to proficient schools outside of Lakeville and Eureka. These areas are almost entirely white and are home to very few residents from other countries.

Hennepin County

While individual cities will be discussed in more detail below, generally, access to proficient schools in Hennepin County begins moderately low in Minneapolis, and gradually increases to very high in the western suburbs, before dropping off again to very low in the far northwestern cities of the county. The lowest access to proficient schools is in Brooklyn Center. Sandwiched between Minneapolis with moderately low index values and Brooklyn Park and Crystal with significantly higher values, Brooklyn Center has an index score of between 18 and 20. Brooklyn Center is very concentrated with Black, Asian, and Hispanic residents, as well as residents from Mexico, Liberia, and Ethiopia.

The next lowest School Proficiency Index values are in the northwest section of Hennepin County. Rogers, Hassan Township, Hanover, and the vast majority of Corcoran have values between 20 and 30, indicating very poor access to proficient schools. Greenfield, Rockford, and the northwestern half of Independence have index values between 30 and 40, indicating slightly higher, but not significant access to independent schools. These areas have very low minority or immigrant populations.

The most moderate values are in the eastern and east of center areas of the county. Minneapolis, Bloomington, northern Golden Valley, Robbinsdale, Crystal, and northeastern Plymouth have index values between 40 and 50. These cities have heavy concentrations of Black and Hispanic residents, as well as residents from Liberia, Mexico, and India. Maple Grove, Shorewood, Excelsior, Tonka Bay, Greenwood, Deephaven, and Woodland have index values between 50 and 60. Maple Grove has a very concentrated Indian population and clusters of Asian residents. The remainders of these cities have very small minority or immigrant populations.

The residents of Hennepin County with the highest access to proficient schools live in central or eastern Hennepin County. Eden Prairie, Edina, Long Lake, most of Orono, Maple Plain, southeastern Independence, and southern Medina have index scores between 70-80. The outliers here are Dayton and Champlin, who also have these high scores on the far northeastern tip of the county. While Champlin does have a concentration of Black residents, Dayton is very white. With the exception of Eden Prairie, which has concentrations of Indian, Ethiopian, Mexican, and Somali

residents as well as clusters of Black and Asian residents, these areas have very small minority or immigrant populations. Parts of the county with the highest School Proficiency Index scores live in Minnetonka Beach, Mound, Spring Park, northern Minnetonka, Wayzata, the western half of Plymouth, and the northeast corner of Medina. These areas all have index values between 80 and 100. With the exception of Plymouth, these areas are very white, with small immigrant populations.

Bloomington

With the exception of a small strip along the border of Edina, the entirety of the city of Bloomington has School Proficiency Index Values between 40 and 50, indicating low to moderate access to proficient schools. Despite the city having concentrations of people of color and immigrant populations, these groups do not appear to have disproportionately low access to proficient schools within the city of Bloomington.

Eden Prairie

The entire city of Eden Prairie has very high access to proficient schools. With the exception of two, very small areas along the Minnetonka border, the entire city has index values between 70 and 80. Despite Eden Prairie's concentration of residents of color and immigrant populations, these groups do not appear to have disproportionately low access to proficient schools within the city.

Minneapolis

Surprisingly, the entire city of Minneapolis has index values between 40 and 50. Despite being an urban city, with clear patterns of segregation of people of color and immigrant populations, it appears that all residents within the city of Minneapolis have relatively equal access to proficient schools in comparison to other residents of the city though not in comparison to residents of surrounding suburban communities.

Minnetonka

School Proficiency Index values reflect moderate to high access to proficient schools throughout the city of Minnetonka. Eastern Minnetonka has values between 50 and 60. This area, which surrounds neighboring Hopkins, is home to concentrations of the city's Black and Asian residents, as well as a heavy concentration of residents from India, Russia, and Ukraine. Western Minnetonka along the orders of Woodland, Deephaven, and Shorewood has values between 70 and 80. This area has a concentration of Russian and Ukrainian residents but no significant clusters of residents of color. The northwestern tip of Minnetonka, bordering Plymouth and Wayzata, has values between 80 and 90. This area is predominately white, with a small cluster of Asian residents, Ethiopian residents, and a concentration of residents from Russia. This map reflects that generally, the areas of the city with higher immigrant and minority group residents have lower access to proficient schools, while the predominately white areas of the city have higher access.

Plymouth

The School Proficiency Index Map for the city of Plymouth indicates significant variation in access to proficient schools, from moderately low to extremely high. If we were to slice the city on a diagonal, the entire western/southwestern section of the city has Index values between 90 and 100. These values are the highest in the city and among the highest in the entire region. While the southern and central portion of this area is predominately white, the northwestern corner and to a

lesser extent the southwestern corner, both have clusters of Black and Asian residents. The northeast corner is also home to the largest concentration of the city's Indian, Nigerian, Korean, and Chinese populations. This indicates that a sizable portion of the city's minority population has access to some of the best schools in the region. There are two sections of Plymouth with more moderate School Proficiency Index Values. A strip stretching along the northern border and ending in the northern center of the city, as well as the far southeast corner have index values between 40 and 50. Both of these sections are predominantly white, but the far southeast corner has clusters of Mexican and Chinese residents.

The area of Plymouth with the lowest access to proficient schools is along the eastern side, from the center of the eastern border with New Hope and narrowly moving towards the center of the city. This area, that corresponds to a concentration of Black, Asian, and Hispanic residents, has index values between 30 and 40. This area also corresponds to concentrations of Nigerian, Indian, Mexican, and Korean residents. Given the small size of Plymouth, this is a drastic difference in access to proficient schools that appears to affect minority and immigrant populations most significantly.

Ramsey County

School Proficiency Index data for Ramsey County reflects clear stratification of access to proficient schools, where areas with the highest concentration of minority group and immigrant populations correspond to the lowest access to proficient schools and the predominantly white and non-immigrant group areas have the highest access to proficient schools. This pattern is reflected with the lightest shading occurring in St. Paul, moderate shading occurring in the immediate outer ring suburbs of St. Paul, and the darkest shading in the northern third of Ramsey County.

The lowest values for the county are in St. Paul, with values between 30 and 40. St. Paul is the main area of the county where Black, Asian, and Hispanic residents, as well as residents from Laos, Thailand, and Ethiopia are concentrated. Compared to the rest of Ramsey County, these populations have significantly lower access to proficient schools. The immediate suburbs, including Maplewood, Little Canada, Falcon Heights, North St. Paul, and the majority of Roseville all have index values between 40 and 50. These cities have Ramsey County's second largest concentration of minority and immigrant populations, indicating that while residents of these cities have slightly higher access to proficient schools than St. Paul residents, this access is still rather low.

The highest access to proficient schools occurs across the entire northern third of the county, in the cities of new Brighton, Mounds View, Arden Hills, Shoreview, North Oaks, Vadnais Heights, Gem Lake, White Bear Lake, White Bear Township, and the northwestern corner of Roseville. These cities all have School Proficiency Index values between 60 and 70. Mounds View and New Brighton have clusters of Black and Asian residents, as well as residents from Mexico, Ethiopia, and Thailand, indicating that minority and/or immigrant group populations residing in these cities have higher access to proficient schools than members of those same groups living elsewhere in Ramsey County. The remainder of these cities with high access to proficient schools are predominantly white, with smaller populations of minority or immigrant group residents.

Like Hennepin County, Ramsey County's urban center of St. Paul has the lowest values and its farther out suburbs have the highest values. Overall, however, Ramsey County's urban center has lower values than Minneapolis, and the higher values for the outer county are still significantly lower than Hennepin County.

St. Paul

The entirety of the city of St. Paul has School Proficiency Index values between 30 and 40. Despite significant segregation of minority group and immigrant group populations in certain areas of the city, this segregation does not appear to create disproportionately low access to proficient schools for specific groups. There is low access to proficient schools across the board.

Washington County

The majority of Washington County has moderate to high access to proficient schools. Woodbury, Cottage Grove, and western Grant have the highest access to proficient schools, at values between 70 and 80. While all the cities are predominantly white, Woodbury and Cottage Grove have the overwhelming majority of the cities minority and immigrant group populations, indicating that members of these groups living in the County have high access to proficient schools. The vast majority of the remainder of Washington County has School Proficiency Index values that are slightly lower, between 60 and 70. Stillwater Township, West Lakeland Township, Lakeland, Lakeland Shores, Lake St. Croix Beach, St. Mary's Point, Afton, Denmark Township, eastern Grant, and the majority of Lake Elmo fall into this range. With the exception of Stillwater, these areas are not densely populated at all and are predominantly white. Oakdale and the southeastern corner of Lake Elmo have the lowest access to proficient schools in the county, with values between 40 and 50. Oakdale has a concentration of Black and Asian residents, as well as residents from Laos and Mexico. Compared to other areas of the county with concentrations of minority or immigrant populations, residents of these groups in Oakdale have much lower access to proficient schools.

Woodbury

The vast majority of the city of Woodbury has high access to proficient schools. With the exception of a slim, L-shaped area in the northeastern corner of the city, the rest of Woodbury have School Proficiency Index values between 70 and 80. This area does have clusters of both minority group and immigrant group populations. The northeastern corner of the county has values between 60 and 70. This area has smaller clusters of Black and Asian residents, as well as a concentrated mix of residents from China, India, Mexico, and Ethiopia. The strip along the northwestern corner of Woodbury has the lowest School Proficiency Index values of the entire city, between 40 and 50. This area has a small population of minority group residents, as well as more significant clusters of residents from India and Mexico.

Scott County

Scott County has School Proficiency Index values ranging from 50 to 80, indicating that the majority of residents have moderate to high access to proficient schools. The areas of the city with the highest values, between 70 and 80, are in predominantly white areas along the eastern and western edges of the county: Prior Lake, Southern Savage, Blakely Township, Credit River Township, the majority of Belle Plaine Township, southwestern St. Lawrence Township, northeastern Spring Lake Township, and northeastern New Market Township. These areas are

overwhelmingly white, with very few minority or immigrant group residents. The areas of Scott County with the highest concentrations of minority group and immigrant populations have the next highest values for the county. Shakopee, Jackson Township, northeastern Louisville Township, Helena Township, Cedar Lake Township, and New Prague all have values between 60 and 70. The remainder of the county has values between 60 and 70. While northeastern St. Lawrence Township, Jordan, Sand Creek Township, and western Spring Lake Township are predominantly white, the northeastern corner of Shakopee and northern Savage have clusters of Black and Asian residents, as well as residents from Mexico, Somalia, Vietnam, and India.

Carver County

The entirety of Carver County has moderately high access to proficient schools. The lowest values in the county are in the far northwestern and far eastern corners. Chanhassen, Chaska, most of Victoria, southeastern Laketown Township, eastern Dahglren, northeastern San Francisco Township, most of Waterntown Township, Watertown, and Hollywood township have School Proficiency Index Values between 60 and 70. Chanhassen and Chaska are almost exclusively the locations of Carver County's minority and immigrant group populations. The remainder of the county has School Proficiency Index Values between 70 and 80. These areas are almost exclusively white and non-immigrant, indicating that residents from minority groups and immigrant populations have slightly lower access to proficient schools.

b. Environmental Opportunities

1. *For the protected class group(s) HUD has provided data, describe any disparities in access to education in the jurisdiction and region.*

2. *For the protected class group(s) HUD has provided data, describe how the disparities in access to education relate to residential living patterns in the jurisdiction and region.*

Region-wide, there are disparities across racial/ethnic groups in access to environmental opportunities, measured as lower exposure to and effects from pollution. Across almost jurisdictions in the Region, non-Hispanic whites, exhibit the highest access to environmentally healthy neighborhoods (index scores of 26), followed by Native Americans and Asian or Pacific Islanders (both 19). All other racial/ethnic groups live in areas with lower index scores: Non-Hispanic Blacks score significantly lowest at 17, followed by Hispanics at 20.

Overall, the Region scores poorly on environmental opportunities. Only Carver County had scores in the 50s, and Dakota County had indices in the 30-40 range. Several others jurisdictions had indices below 10, including Ramsey County, St. Paul, Woodbury, and Minneapolis.

In addition to the Region, other jurisdictions also have disparate environmental scores between races. One such jurisdiction is Scott County, in which non-Hispanic whites have a score 37 whereas non-Hispanic Blacks have an index of 26. Another such jurisdiction is Anoka County, with non-Hispanic whites having an index of 30 and non-Hispanic Blacks 19.

Jurisdictions with the highest environmental opportunity appear to have primarily large concentrations of non-Hispanic Whites. Examples include Washington County, Dakota County, and Woodbury. The jurisdiction with the lowest concentration of non-Hispanic whites, St. Paul,

has the lowest environmental opportunity scores. St. Paul and other low-scoring jurisdictions including Minneapolis, Hennepin County, and Ramsey County are also home to the eleven R/ECAPs in the Region. Bloomington, with the second lowest environmental opportunity score, does not contain any R/ECAPs, nor do low-scoring Minnetonka and Plymouth.

In the Region, lower-scoring jurisdictions exhibit a diversity of residential patterns, from the large cities of St. Paul and Minneapolis with a higher concentration of non-Hispanic Blacks, Hispanics, and Asian/Pacific Islanders to the predominantly suburban jurisdictions of Bloomington, Minnetonka, and Plymouth.

c. *Economic Opportunities*

1. *For the protected class group(s) HUD has provided data, describe any disparities in access to education in the jurisdiction and region.*

2. *For the protected class group(s) HUD has provided data, describe how the disparities in access to education relate to residential living patterns in the jurisdiction and region.*

Access to employment at a decent wage is a hallmark of broader access to opportunity. The neighborhood or city in which a person lives can affect one's access to employment. This can happen both through proximity of residential areas to places with high concentrations (or low concentrations) of jobs and through barriers to residents of particular neighborhoods accessing jobs, even when they are close by. The analysis in this section is based on review of two data indicators for each jurisdiction, the Labor Market Index and the Jobs Proximity Index. The Labor Market Index measures, by census tract in a jurisdiction, the level of engagement residents within that tract have in the labor force. Values range from 0 to 100. The higher the score, the higher the rates of employment in that particular area. The Jobs Proximity Index measures by census tract, the accessibility that tract's residents have to employment opportunities. Values range from 0 to 100. The higher the score, the more access residents from that area have to employment opportunities.

<u>Anoka County</u>

The vast majority of Anoka County has high Labor Market Index values, indicating that a large majority of residents are employed and participate in the labor market. The lowest Labor Market Index values occur in the city of Anoka, a small patch of eastern Blaine, norther Fridley, eastern Columbia Heights, and the northwest corner of Lino Lakes. These areas do not correspond to areas with concentrations of minority groups, but do correspond directly to concentrations of residents born outside of the United States. The area of Anoka with lower index scores corresponds to clusters of Liberian and Mexican residents. The area of Fridley has a concentration of Mexican and Indian residents, and the area of Columbia Heights has concentrations of Ethiopian and Mexican residents. This indicates that in Anoka County, some residents of immigrant populations have lower participation in the labor market. The remainder of the county, regardless of concentrations of minority or immigrant populations, have Labor Market Index values between 80 and 90, indicating very high participation in the labor market and very low levels of unemployment.

<u>Coon Rapids</u>

The entirety of the city of Coon Rapids, regardless of groupings of racial or immigrant populations, has Labor Market Index values between 80 and 90. This indicates very high levels of labor market participation and low levels of unemployment across the board.

Dakota County

Overall, residents within Dakota County have relatively high participation in the labor market. Values range from 70 to 100 throughout the county. The areas with the highest Labor Market Index values are located in small patches near central Rosemount, northeastern Farmington/western Empire Township, northeastern Lakeville, and western Eagan. These areas have Index values between 90 and 100. While these areas do not correspond to large numbers of minority group populations, they correspond heavily to areas with concentration of the County's immigrant populations. In Farmington, the patch corresponds to clusters of Liberian and Mexican residents. In Rosemount, the patch corresponds to clusters of Liberian, Mexican, and Bosnian residents. The areas of Eagan and Lakeville correspond to a very heavy concentration of all of the County's immigrant groups.

The areas of the county with the lowest Labor Market Index values are in central Burnsville, central Apple Valley, northern Mendota Heights, West St. Paul, and northeastern South St. Paul. These areas have values between 70 and 80. These areas do not correspond to high concentrations of minority group residents, but some correspond to certain immigrant populations. Central Apple Valley has a concentration of Laotian residents, West St. Paul has a very heavy concentration of residents from Mexico and Liberia, and northeastern South St. Paul has a cluster of Liberian residents. This reflects that immigrant group residents in these area have lower levels of participation in the labor market than residents of the same groups elsewhere in the County. The remainder of Dakota County has Labor Market Index values between 80 and 90 across the board.

Hennepin County

The overwhelming majority of cities in Hennepin County have Labor Market Index values between 80 and 90, indicating very high participation in the labor market. There are four areas of the County with higher values. A central and northeastern section of St. Louis Park, southeastern Champlin, and central/north of central Minneapolis all have index values between 90 and 100. These areas of St. Louis Park and Champlin are predominantly white, but in St. Louis Park that patch corresponds to concentration of Mexican residents. In Minneapolis (discussed in more detail below), these areas have significant minority and immigrant group populations as well. The areas of Hennepin County with the lowest Labor Market Index values are in Orono, Wayzata, southwestern Plymouth, southeastern Excelsior, central and western Minnetonka, southeastern Edina, and several patches in Bloomington. Though lower than the remainder of the county, these values are still between 70 and 80. With the exception of Bloomington (discussed in more detail below), these areas are predominantly white and do not seem to indicate lower participation among minority or immigrant group populations.

Bloomington

The entirety of the city of Bloomington has Labor Market Index values between 70 and 90. The northeast corner, a strip along the southwest border, and a patch just north of the center of the city have the lowest values, which are between 70 and 80. This still represents high levels of employment, and these patches to not correspond to concentrations of minority groups. These areas

do not correspond to concentrations of immigrant populations, with the exception of the northern central patch which has a cluster of residents form Mexico. The remainder of the city has index values between 80 and 90, including the northeastern section of the Bloomington with the heaviest concentration of minority and immigrant group populations.

Eden Prairie

The overwhelming majority of the city of Eden Prairie has Labor Market Index values between 80 and 90, indicating very high participation in the labor market across the board, and low levels of unemployment regardless of race or national origin. The one exception is a small patch along the eastern border, but even this patch has values between 70 and 80. This patch does have a cluster of Black residents, as well as a heavy concentration of residents from Somalia, China, and almost the entirety of the city's Ethiopian population. This tends to indicate that residents from these immigrant groups may have lower involvement in the labor market than members of the same groups elsewhere in the city.

Minneapolis

Generally, the whitest areas of Minneapolis have the highest levels of participation in the labor market. The areas northeast and west of downtown Minneapolis have Labor Market Index values between 90 and 100. These areas have small clusters of Black and Asian residents, but are predominantly white. The area west of downtown does have a concentration of Somali residents. The area of Minneapolis with the lowest value is a small patch in the center of the city. This patch has Labor Market Index values between 60 and 70. While this area does correspond to clusters of Black, Somali, and Ethiopian residents, the lower values in this patch may be explained by its proximity to the University of Minnesota. Northeastern and northwestern Minneapolis have the next lowest values, between 70 and 80. Both areas are home to the city's concentrations of Black and Asian residents, as well as Mexican, Laotian, and Ethiopian residents. The remainder of the city has index values between 80 and 90, regardless of race or national origin.

Minnetonka

The entirety of Minnetonka has high labor market participation, with values ranging from 70 to 90 on the Labor Market Index. There are two patches of the city, one along the western border and one just south of the center of the city, that have values between 70 and 80. These areas are almost exclusively white, but the southern patch does have a concentration of residents from various immigrant populations. This tends to indicate that these residents may have lower participation in the labor market, compared to residents of the same groups elsewhere in the city. The rest of Minnetonka has values between 80 and 90, regardless of race or national origin, indicating high labor market participation across the board.

Plymouth

With the exception of a small patch in the southwest corner of the city, the entire city of Plymouth has Labor Market Index values between 80 and 90, indicating high labor market participation across the board. These values remain high regardless of concentrations of race or residents with different national origins. The southeastern patch has values between 70 and 80, indicating labor market participation that is still fairly high. This patch does not correspond to concentrations of minority or immigrant group populations, reflecting that these groups do not have disparately low participation in the labor market.

Ramsey County

Ramsey County has various levels of labor market participation, though the entire county has values higher than 60. Both the lowest and highest levels of labor market participation are in St. Paul, which is discussed individually below. The remainder of Ramsey County has values between 70 and 90.

d. . Transportation

1. *For the protected class group(s) HUD has provided data, describe any disparities in access to education in the jurisdiction and region.*

2. *For the protected class group(s) HUD has provided data, describe how the disparities in access to education relate to residential living patterns in the jurisdiction and region.*

Higher scores on the low transportation cost index indicate greater access to low cost transportation. When analyzing the Twin Cities Region as a whole, non-Hispanic whites have the lowest scores (74.19). Black residents have the highest score of 83 while Hispanic and Native Americans have the second highest score of 80. Asians and Pacific Islanders have a score of 79. Regionally, low transportation cost index scores are similar for all racial and ethnic groups.

There are no significant disparities between racial/ethnic groups in the low transportation cost index in most jurisdictions in the Region. In most jurisdictions, there are higher scores for members of protected classes than for non-Hispanic Whites. Almost all index scores are above 70 for all racial and ethnic groups.

The Transit Trips Index measures how often low-income families in a neighborhood use public transportation. Transit trips index scores also do not vary significantly by racial or ethnic group in most jurisdictions in the Twin Cities region, but scores vary between regions. The jurisdiction with the highest score is Minneapolis, with a range between 84-86. St. Paul is also high, with a range of 78-80. Jurisdictions with lower scores include Carver County, with ranges of 47-52, and Scott County, with ranges of 48-54. Scores are moderate to high in all Twin Cities jurisdictions.

Low Transportation Cost Index scores as well as Transit Trips index scores are generally lower in the more suburban and rural sections of the Twin Cities region than the more highly populated cities of Minneapolis and St. Paul. Scores are generally higher in jurisdictions with greater levels of density, which are also the location of R/ECAPs. Jurisdictions with greater concentrations of non-Hispanic white residents tend to have lower transit index scores and transportation cost index scores. This pattern likely contributes to disparities in transportation cost index and transit index scores between non-Hispanic whites and other racial and ethnic groups in the Region.

e. Patterns in Disparities in Access to Opportunity

1. *For the protected class groups HUD has provided data, identify and discuss any overarching patterns of access to opportunity and exposure to adverse community factors. Include how these patterns compare to patterns of segregation, integration, and R/ECAPs. Describe these patterns for the jurisdiction and region*

Generally, access to opportunity in the Twin Cities region is highest for non-Hispanic whites, particularly in educational opportunity, environmental opportunity, and labor market engagement. By contrast, access to educational opportunity, environmental opportunity, and labor market engagement is lowest for non-Hispanic Blacks. However, when it comes to transportation and jobs proximity non-Hispanic Blacks have higher opportunities than non-Hispanic whites, as do the majority of Native American, Asian or Pacific Islander, and Hispanic populations.

Geographically, access to environmental and educational opportunity is generally lowest in the higher density regions of Minneapolis, St. Paul, and higher in the more suburban and exurban portions of the Region. The reverse is true for access to transportation and job opportunities, which are higher in the more populated regions. Labor market engagement is consistently high throughout the Region.

Table 1: Index Values, Anoka County

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	67.55	50.72	30.45	13.59	84.34	63.84
Black	78.39	59.76	18.7	22.65	82.87	56.38
Native American	71.57	54.08	27.12	17.77	83.29	54.85
Asian or Pacific Islander	72.17	56	24.22	15.78	84.11	60.38
Hispanic	75.68	58.77	20.37	20.4	83.03	55.9

Table 2: Index Values, Coon Rapids

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	74.74	56.59	26.87	10.21	83.64	67.46
Black	77.36	57.47	25.69	10.37	83.74	67.46
Native American	75	58.38	26.9	7.37	83.83	67.46
Asian or Pacific Islander	74.3	56.64	26.15	9.44	84.01	67.46
Hispanic	77.96	60.08	25.4	9.04	84.13	67.46

Table 3: Index Values, Dakota County

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	71.55	57.6	40.01	27.14	85.39	65.46
Black	78.03	62.41	37.18	30.87	85.22	62.81
Native American	76.09	60.29	37.01	36.77	84.5	60.62
Asian or Pacific Islander	73.32	59.52	38.02	30.91	85.94	64.79
Hispanic	77.16	62.01	35.6	30.88	84.34	63.42

Table 4: Index Values, Hennepin County

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	78.87	70.04	23.64	64.9	84.11	53.1
Black	84.62	77.22	17.37	66.34	81.9	48.8
Native American	84.87	79.54	14.73	71.74	82.79	48.64
Asian or Pacific Islander	79.97	72.17	22.18	62.82	83.01	52.34
Hispanic	84.43	77.31	17.66	69.14	83.57	48.86

Table 5: Index Values, Bloomington

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	81.17	68.09	29.16	70.36	82.39	49.87
Black	83.55	68.09	26.32	71.32	82.98	49.87
Native American	80.59	65.81	30.97	61.86	82.37	49.87
Asian or Pacific Islander	82.38	69.32	28.12	71.46	83.34	49.87
Hispanic	83.47	69.92	26.3	72.83	83.71	49.87

Table 6: Index Values, Eden Prairie

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	71.82	65.47	33	83.73	85.37	72.11
Black	80.92	69.98	30.85	94.29	84.36	72.11
Native American	66.6	61.36	33.58	83.91	85.54	72.11
Asian or Pacific Islander	73.54	68.5	33.22	86.23	85.89	72.11
Hispanic	80.87	70.77	32.14	92.75	85.49	72.11

Table 7: Index Values, Minneapolis

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	87.55	84.33	11.82	72.49	85.26	46.09
Black	88.8	86.41	10.51	79.83	80.42	46.09
Native American	88.22	85.74	9.44	77.23	82.51	46.09
Asian or Pacific Islander	88.01	85.29	10.87	80.24	80.59	46.09
Hispanic	88.51	86.72	9.98	77.96	83.48	46.09

Table 8: Index Values, Minnetonka

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	75.61	61.45	30.52	80.99	82.13	67.1
Black	83.28	70.22	26.65	87.27	84.11	63.14
Native American	75.66	59.83	30.7	82.24	82.8	N/A
Asian or Pacific Islander	81.16	67.82	28.51	85.94	83.01	62.69
Hispanic	76.94	63	30.15	81.28	82.25	65.96

Table 9: Index Values, Plymouth

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	75.88	65.4	30.15	63.82	84.44	78.14
Black	76.31	66.89	29.53	63.04	84.99	71.24
Native American	74.73	63.96	30.15	69.15	83.15	82.34
Asian or Pacific Islander	75.38	64.49	30.74	60.27	85.01	78.4
Hispanic	77.25	66.74	29.59	66	85.02	75.7

Table 10: Index Values, Ramsey County

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	81.92	70.66	7.34	68.26	82.38	46.87
Black	85.07	76.65	6.99	72.96	80.54	39.41
Native American	84.65	76.57	6.05	76.21	80.79	41.17
Asian or Pacific Islander	83.34	74.58	8.42	70.24	80.23	39.77
Hispanic	83.84	75.15	7.52	70.64	81.25	40.7

Table 11: Index Values, St. Paul

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	85.62	78.51	7.32	75.18	83.08	36.83
Black	86.11	79.54	7.94	75.38	80.07	36.83
Native American	86.17	80.72	6.49	79.53	80.41	36.83
Asian or Pacific Islander	84.63	78.05	9.7	73.24	79.57	36.83
Hispanic	85.07	78.81	8.41	73.64	80.86	36.83

Table 12: Index Values, Washington County

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	66.27	49.79	20.96	23.65	83.73	64.24
Black	73.97	51.6	14.89	26.32	78.64	64.65
Native American	78.41	36.7	26.13	40.79	58.32	65.21
Asian or Pacific Islander	69.33	54.28	11.32	19.36	84.63	64.7
Hispanic	69.22	53.27	14.51	21.04	83.36	62.72

Table 13: Index Values, Woodbury

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	69.49	57.14	7.74	14.13	85.35	70.33
Black	72.68	58.32	7.21	14.38	85.25	70.33
Native American	78.59	58.9	4.26	23.87	85.63	70.33
Asian or Pacific Islander	69.8	56.34	7.73	14.02	85.73	70.33
Hispanic	70.3	58.59	7.35	13.77	85.35	70.33

Table 14: Index Values, Scott County

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	62.7	47.77	37.32	27.41	86.37	72.13
Black	69.09	54.34	25.92	30.86	87.48	66.85
Native American	64.18	48.46	36.13	32.83	82.82	69.67
Asian or Pacific Islander	67.38	52.95	29.17	31.82	87.41	71.26
Hispanic	67.01	50.05	33.84	30.91	85.84	71.39

Table 15: Index Values, Carver County

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	64.74	47.67	55.79	29.77	86.93	67.58
Black	65.42	46.93	55.22	28.4	87.66	67.58
Native American	67.93	48.41	55.91	29.16	86.94	67.58
Asian or Pacific Islander	66.28	52.35	49.82	38.22	87.14	67.58
Hispanic	68.96	52.29	52.43	31.73	87.01	67.58

Table 16: Index Values, Region

	Low Transportation Cost Index	Transit Index	Environmental Opportunity Index	Jobs Proximity Index	Labor Market Engagement Index	School Proficiency Index
White	74.19	61.83	26.2	45.94	84.26	56.94
Black	82.96	73.1	17.1	59.45	81.95	48.29
Native American	80.33	69.06	18.96	57.91	81.18	49.28
Asian or Pacific Islander	78.71	68.71	18.93	55.19	82.71	48.95
Hispanic	80.76	70.3	19.58	55.19	83.3	49.52

iv. Disproportionate Housing Needs

1. *Which groups (by race/ethnicity and family status) experience higher rates of housing cost burden, overcrowding, or substandard housing when compared to other groups? Which groups also experience higher rates of severe housing burdens when compared to other groups?*

Across the Twin Cities Region, many residents face high rates of housing problems, severe housing problems, and severe housing cost burden. The four HUD-designated housing problems include when a "1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost burdened"[6]. Households are considered to have a housing problem if they experience at least one of the above. This analysis also considers what HUD designates as severe housing problems, which are a lack of kitchen or plumbing, more than one person per room, or cost burden greater than 50%.

[6] https://www.huduser.gov/portal/datasets/cp/CHAS/bg_chas.html

Housing Problems

Table 1: Housing Problems, Anoka County

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	25,457	109,560	23.24%
Black, Non-Hispanic	2,619	4,791	54.66%
Hispanic	1,472	3,234	45.52%
Asian or Pacific Islander, Non-Hispanic	1,073	3,811	28.16%
Native American, Non-Hispanic	228	784	29.08%
Total	30,849	122,180	25.25%
Household Type and Size			
Family households, <5 people	14045	77157	18.20%
Family households, 5+ people	4146	11912	34.81%
Non-family households	13275	34582	38.39%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	10996	109,560	10.04%
Black, Non-Hispanic	1569	4,791	32.75%
Hispanic	969	3,234	29.96%
Asian or Pacific Islander, Non-Hispanic	625	3,811	16.40%
Native American, Non-Hispanic	118	784	15.05%
Total	14,277	122,180	11.69%

Demographics of Households with Severe Housing Cost Burden

Households with Severe Housing Cost Burden	Jurisdiction		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	9635	109,560	8.79%
Black, Non-Hispanic	1288	4,791	26.88%
Hispanic	452	3,234	13.98%
Asian or Pacific Islander, Non-Hispanic	424	3,811	11.13%
Native American, Non-Hispanic	94	784	11.99%
Total	11,893	122,180	9.73%
Household Type and Size			
Family households, <5 people	5170	77157	6.70%
Family households, 5+ people	949	11912	7.97%
Non-family households	6067	34582	17.54%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

In Anoka County, rates of housing problems, severe housing problems and cost burden are fairly consistent with the Region as a whole. Slightly fewer residents are likely to experience housing problems, but the rates remain high for Black and Hispanic residents at 54.66% and 45.52%, respectively. Families with five or more members or non-family households are more likely to experience housing problems as well. While less residents overall experience severe housing problems, Black and Hispanic residents experience significantly higher rates at 32.75% and 29.96% respectively, compared to 11.69% of residents overall. Black residents experience cost burden most frequently at 26.88%.

Table 2: Housing Problems, Coon Rapids

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	5,190	21,200	24.48%
Black, Non-Hispanic	589	975	60.41%
Hispanic	320	675	47.41%
Asian or Pacific Islander, Non-Hispanic	124	589	21.05%

Native American, Non-Hispanic	35	70	50.00%
Total	6,258	23,509	26.62%
Household Type and Size			
Family households, <5 people	2470	14375	17.18%
Family households, 5+ people	830	1995	41.60%
Non-family households	3135	7555	41.50%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	2420	21,200	11.42%
Black, Non-Hispanic	333	975	34.15%
Hispanic	190	675	28.15%
Asian or Pacific Islander, Non-Hispanic	63	589	10.70%
Native American, Non-Hispanic	10	70	14.29%
Total	3,016	23,509	12.83%

Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden	**Jurisdiction**		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	2155	21,200	10.17%
Black, Non-Hispanic	265	975	27.18%
Hispanic	100	675	14.81%
Asian or Pacific Islander, Non-Hispanic	60	589	10.19%
Native American, Non-Hispanic	10	70	14.29%
Total	2,590	23,509	11.02%
Household Type and Size			
Family households, <5 people	914	14375	6.36%

Family households, 5+ people	180	1995	9.02%
Non-family households	1614	7555	21.36%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

Of the entire Region, disproportionate experiences of housing problems are most visible in Coon Rapids. Black residents in Coon Rapids experience housing problems at a rate of 60.41%, the highest in the Region. This is despite the total population experiencing housing problems at a rate of 26.62%, which is slightly less than average. Large families or non-family households experience housing problems at rates of 41.60% and 41.50%, respectively. Black residents are about half as likely to experience severe housing problems, but this figure at 34.15% is still higher than the 12.83% overall rate. Hispanic residents experience severe housing problems at a rate of 28.15%, which is also higher than average for Coon Rapids.

Table 3: Housing Problems, Dakota County

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	30,281	129,933	23.31%
Black, Non-Hispanic	3,223	7,015	45.94%
Hispanic	3,176	7,100	44.73%
Asian or Pacific Islander, Non-Hispanic	1,401	5,646	24.81%
Native American, Non-Hispanic	106	323	32.82%
Total	38,187	150,017	25.46%
Household Type and Size			
Family households, <5 people	16938	92750	18.26%
Family households, 5+ people	3871	12196	31.74%
Non-family households	18193	47428	38.36%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	12103	129,933	9.31%
Black, Non-Hispanic	1544	7,015	22.01%

Hispanic	1735	7,100	24.44%
Asian or Pacific Islander, Non-Hispanic	831	5,646	14.72%
Native American, Non-Hispanic	42	323	13.00%
Total	16,255	150,017	10.84%

Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden	**Jurisdiction**		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	11153	129,933	8.58%
Black, Non-Hispanic	1220	7,015	17.39%
Hispanic	1197	7,100	16.86%
Asian or Pacific Islander, Non-Hispanic	537	5,646	9.51%
Native American, Non-Hispanic	49	323	15.17%
Total	14,156	150,017	9.44%
Household Type and Size			
Family households, <5 people	5799	92750	6.25%
Family households, 5+ people	1087	12196	8.91%
Non-family households	7650	47428	16.13%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

In Dakota County, rates of residents experiencing housing problems, severe housing problems and cost burden are for the most part consistent with the Region. 25.46% of residents overall experience housing problems, with the figure being higher than but not as high as other jurisdictions for Black and Hispanic residents, at 45.94% and 44.73%. Non-family households are most likely to experience housing problems at 38.36%. Black, Hispanic and Asian or Pacific Islander residents are more likely to experience severe housing problems than White residents, at rates of 22.01%, 24.44% and 14.72%, respectively, as opposed to 9.31% for White residents. Black and Hispanic residents are also twice as likely to experience severe cost burden, at rates of 17.39% and 16.86%.

Table 4: Housing Problems, Hennepin County

Demographics of Households with Disproportionate Housing Needs	
Disproportionate Housing Needs	

Households experiencing any of 4 housing problems	# with problems	# households	% with problems
Race/Ethnicity			
White, Non-Hispanic	100,595	383,873	26.21%
Black, Non-Hispanic	29,446	51,599	57.07%
Hispanic	10,946	20,655	52.99%
Asian or Pacific Islander, Non-Hispanic	7,361	24,981	29.47%
Native American, Non-Hispanic	1028	2,450	41.96%
Total	149,376	483,558	30.89%
Household Type and Size			
Family households, <5 people	54606	250051	21.84%
Family households, 5+ people	15577	34498	45.15%
Non-family households	83373	209127	39.87%
Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems
Race/Ethnicity			
White, Non-Hispanic	46648	383,873	12.15%
Black, Non-Hispanic	17799	51,599	34.49%
Hispanic	7345	20,655	35.56%
Asian or Pacific Islander, Non-Hispanic	4291	24,981	17.18%
Native American, Non-Hispanic	644	2,450	26.29%
Total	76,727	483,558	15.87%

Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden	Jurisdiction		
Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	43390	383,873	11.30%
Black, Non-Hispanic	14261	51,599	27.64%
Hispanic	3613	20,655	17.49%

Asian or Pacific Islander, Non-Hispanic	2437	24,981	9.76%
Native American, Non-Hispanic	597	2,450	24.37%
Total	64,298	483,558	13.30%
Household Type and Size			
Family households, <5 people	21464	250051	8.58%
Family households, 5+ people	3730	34498	10.81%
Non-family households	41239	209127	19.72%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

Residents of Hennepin County are overall more likely to experience housing problems, severe housing problems, and severe cost burden. 30.89% of all residents experience housing problems, with high rates for Black and Hispanic residents at 57.07% and 52.99%. Native American residents in the County similarly experience high rates at 41.96% (this figure is more dependable than in other jurisdictions due to the higher Native American population in Hennepin County). Large families and non-family households are also more likely to experience housing problems, at45.15% and 39.87%, respectively. While 15.87% of households overall experience severe housing problems, white residents are least likely to experience them, at 12.15%. Hispanic residents most likely to experience severe housing problems, at 35.56%. Overall, 13.30% of residents experience cost burden, but Asian or Pacific Islander residents are least likely to at 9.76%, while Black and Native American households experience cost burden at rates of 27.64% and 24.37%.

Table 5: Housing Problems, Bloomington

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	6,985	29,970	23.31%
Black, Non-Hispanic	1,305	2,460	53.05%
Hispanic	919	1,705	53.90%
Asian or Pacific Islander, Non-Hispanic	490	1,495	32.78%
Native American, Non-Hispanic	14	65	21.54%
Total	9,713	35,695	27.21%
Household Type and Size			

Family households, <5 people	3500	19485	17.96%
Family households, 5+ people	1185	2170	54.61%
Non-family households	5200	14570	35.69%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	2995	29,970	9.99%
Black, Non-Hispanic	780	2,460	31.71%
Hispanic	593	1,705	34.78%
Asian or Pacific Islander, Non-Hispanic	255	1,495	17.06%
Native American, Non-Hispanic	0	65	0.00%
Total	4,623	35,695	12.95%

Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden	**Jurisdiction**		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	2755	29,970	9.19%
Black, Non-Hispanic	615	2,460	25.00%
Hispanic	260	1,705	15.25%
Asian or Pacific Islander, Non-Hispanic	135	1,495	9.03%
Native American, Non-Hispanic	0	65	0.00%
Total	3,765	35,695	10.55%
Household Type and Size			
Family households, <5 people	1314	19485	6.74%
Family households, 5+ people	165	2170	7.60%
Non-family households	2360	14570	16.20%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

Rates of housing problems, severe housing problems and cost burden are consistent with the Region for Bloomington. Hispanic residents experience housing problems at a slightly higher rate than Black residents, at 53.90% and 53.50%. Large families are especially likely to experience housing problems in Bloomington at 54.61%. While 12.95% of all residents experience severe housing problems, Black and Hispanic residents are almost three times as likely to do so. 25.00% of Black residents in the City also experience severe housing cost burden.

Table 6: Housing Problems, Eden Prairie

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	4,160	20,330	20.46%
Black, Non-Hispanic	715	1,215	58.85%
Hispanic	345	710	48.59%
Asian or Pacific Islander, Non-Hispanic	304	2,040	14.90%
Native American, Non-Hispanic	20	75	26.67%
Total	5,544	24,370	22.75%
Household Type and Size			
Family households, <5 people	2450	15390	15.92%
Family households, 5+ people	625	1999	31.27%
Non-family households	2505	7330	34.17%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	2090	20,330	10.28%
Black, Non-Hispanic	520	1,215	42.80%
Hispanic	119	710	16.76%
Asian or Pacific Islander, Non-Hispanic	180	2,040	8.82%
Native American, Non-Hispanic	20	75	26.67%
Total	2,929	24,370	12.02%

Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden	**Jurisdiction**		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	1965	20,330	9.67%
Black, Non-Hispanic	280	1,215	23.05%
Hispanic	70	710	9.86%
Asian or Pacific Islander, Non-Hispanic	55	2,040	2.70%
Native American, Non-Hispanic	20	75	26.67%
Total	2,390	24,370	9.81%
Household Type and Size			
Family households, <5 people	899	15390	5.84%
Family households, 5+ people	90	1999	4.50%
Non-family households	1408	7330	19.21%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

Despite an overall lower rate of housing problems for Eden Prairie, Black residents are more likely than average to experience housing problems, at a rate of 58.85%. Similarly, Black residents have the highest rates of severe housing problems and severe cost burden by far, at 42.80% and 23.05%. Asian residents are less likely to experience housing problems, severe housing problems or severe cost burden in Eden Prairie than average.

Table 7: Housing Problems, Minneapolis

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	35,005	117,775	29.72%
Black, Non-Hispanic	15,880	27,190	58.40%
Hispanic	5,625	10,115	55.61%
Asian or Pacific Islander, Non-Hispanic	3,218	7,735	41.60%

Native American, Non-Hispanic	685	1,495	45.82%
Total	60,413	164,310	36.77%
Household Type and Size			
Family households, <5 people	17815	66110	26.95%
Family households, 5+ people	6500	10240	63.48%
Non-family households	38675	93455	41.38%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	17375	117,775	14.75%
Black, Non-Hispanic	10035	27,190	36.91%
Hispanic	3920	10,115	38.75%
Asian or Pacific Islander, Non-Hispanic	2218	7,735	28.67%
Native American, Non-Hispanic	434	1,495	29.03%
Total	33,982	164,310	20.68%

Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden	**Jurisdiction**		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	16010	117,775	13.59%
Black, Non-Hispanic	8160	27,190	30.01%
Hispanic	1945	10,115	19.23%
Asian or Pacific Islander, Non-Hispanic	1460	7,735	18.88%
Native American, Non-Hispanic	400	1,495	26.76%
Total	27,975	164,310	17.03%
Household Type and Size			
Family households, <5 people	7830	66110	11.84%

Family households, 5+ people	1745	10240	17.04%
Non-family households	19800	93455	21.19%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

Rates of housing problems, severe housing problems and severe cost burden are all higher in Minneapolis than in the Region. While the average rate of housing problems is 36.77% for the City, white residents experience housing problems at a rate of 29.72%, Black residents at a rate of 58.40%, Hispanic residents at a rate of 55.61%, Asian or Pacific Islander residents at a rate of 41.60%, and Native American residents at a rate of 45.82% (similar to Hennepin County, this figure is more accurate than in other parts of the Region due to the higher population of Native Americans). Large families experience housing problems at a rate of 63.48%. While 20.68% of residents experience severe housing problems, this number is lower for White residents and higher for non-White residents. Black and Native American residents experience the highest rates of severe cost burden, at 30.01% and 26.76%.

Table 8: Housing Problems, Minnetonka

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	5,475	20,875	26.23%
Black, Non-Hispanic	304	600	50.67%
Hispanic	105	255	41.18%
Asian or Pacific Islander, Non-Hispanic	94	675	13.93%
Native American, Non-Hispanic	0	35	0.00%
Total	5,978	22,440	26.64%
Household Type and Size			
Family households, <5 people	2540	12910	19.67%
Family households, 5+ people	225	965	23.32%
Non-family households	3260	8880	36.71%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			

White, Non-Hispanic	2490	20,875	11.93%
Black, Non-Hispanic	104	600	17.33%
Hispanic	14	255	5.49%
Asian or Pacific Islander, Non-Hispanic	44	675	6.52%
Native American, Non-Hispanic	0	35	0.00%
Total	2,652	22,440	11.82%

Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden	**Jurisdiction**		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	2280	20,875	10.92%
Black, Non-Hispanic	74	600	12.33%
Hispanic	10	255	3.92%
Asian or Pacific Islander, Non-Hispanic	30	675	4.44%
Native American, Non-Hispanic	0	35	0.00%
Total	2,394	22,440	10.67%
Household Type and Size			
Family households, <5 people	750	12910	5.81%
Family households, 5+ people	34	965	3.52%
Non-family households	1630	8880	18.36%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

Residents in Minnetonka experience housing problems, severe housing problems and severe cost burden at rates consistent with the Region. However, Asian or Pacific Islander residents are least likely to experience housing problems, while Hispanic residents are least likely to experience severe housing problems or severe cost burden. Black residents are most likely to experience any of these issues, especially housing problems at a rate of 50.67%.

Table 9: Housing Problems, Plymouth

Demographics of Households with Disproportionate Housing Needs	
Disproportionate Housing Needs	

Households experiencing any of 4 housing problems	# with problems	# households	% with problems
Race/Ethnicity			
White, Non-Hispanic	6,020	26,030	23.13%
Black, Non-Hispanic	610	1,185	51.48%
Hispanic	325	935	34.76%
Asian or Pacific Islander, Non-Hispanic	340	2,060	16.50%
Native American, Non-Hispanic	30	35	85.71%
Total	7,325	30,245	24.22%
Household Type and Size			
Family households, <5 people	3260	18835	17.31%
Family households, 5+ people	480	1735	27.67%
Non-family households	3690	10020	36.83%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	2600	26,030	9.99%
Black, Non-Hispanic	380	1,185	32.07%
Hispanic	190	935	20.32%
Asian or Pacific Islander, Non-Hispanic	90	2,060	4.37%
Native American, Non-Hispanic	30	35	85.71%
Total	3,290	30,245	10.88%

Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden	**Jurisdiction**		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	2505	26,030	9.62%
Black, Non-Hispanic	355	1,185	29.96%
Hispanic	140	935	14.97%

Asian or Pacific Islander, Non-Hispanic	30	2,060	1.46%
Native American, Non-Hispanic	30	35	85.71%
Total	3,060	30,245	10.12%
Household Type and Size			
Family households, <5 people	1250	18835	6.64%
Family households, 5+ people	205	1735	11.82%
Non-family households	1685	10020	16.82%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

In Plymouth, Black residents face significantly higher rates of housing problems than other residents at a rate of 51.48%. The same is true for severe housing problems and severe housing cost burden, at 32.07% and 29.96%. Hispanic residents also face higher than average rates of all three of these issues, though less than Black residents.

Table 10: Housing Problems, Ramsey County

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	41,153	150,420	27.36%
Black, Non-Hispanic	11,068	20,353	54.38%
Hispanic	4,896	9,533	51.36%
Asian or Pacific Islander, Non-Hispanic	8,421	17,063	49.35%
Native American, Non-Hispanic	432	1,009	42.81%
Total	65,970	198,378	33.25%
Household Type and Size			
Family households, <5 people	24097	100549	23.97%
Family households, 5+ people	9774	17211	56.79%
Non-family households	34123	84904	40.19%

Households experiencing any of 4 Severe Housing Problems	# with severe problems	# households	% with severe problems
Race/Ethnicity			
White, Non-Hispanic	19448	150,420	12.93%
Black, Non-Hispanic	6998	20,353	34.38%
Hispanic	2847	9,533	29.86%
Asian or Pacific Islander, Non-Hispanic	6108	17,063	35.80%
Native American, Non-Hispanic	247	1,009	24.48%
Total	35,648	198,378	17.97%

Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden	**Jurisdiction**		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	17543	150,420	11.66%
Black, Non-Hispanic	5269	20,353	25.89%
Hispanic	1894	9,533	19.87%
Asian or Pacific Islander, Non-Hispanic	3095	17,063	18.14%
Native American, Non-Hispanic	212	1,009	21.01%
Total	28,013	198,378	14.12%
Household Type and Size			
Family households, <5 people	9887	100549	9.83%
Family households, 5+ people	2092	17211	12.16%
Non-family households	16853	84904	19.85%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

Rates of housing problems, severe housing problems and severe cost burden are higher than average for the Region in Ramsey County, at 33.25%, 17.97% and 14.12% respectively. Black and Hispanic residents experiences these issues at the highest rates. All non-White populations experience housing problems at rates over 40%, but Black and Hispanic residents are most affected by severe housing problems and severe housing cost burden.

Table 11: Housing Problems, St. Paul

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	22,025	74,895	29.41%
Black, Non-Hispanic	8,940	15,845	56.42%
Hispanic	3,705	7,000	52.93%
Asian or Pacific Islander, Non-Hispanic	6,325	11,330	55.83%
Native American, Non-Hispanic	300	590	50.85%
Total	41,295	109,660	37.66%
Household Type and Size			
Family households, <5 people	14435	50530	28.57%
Family households, 5+ people	7325	11380	64.37%
Non-family households	20880	50650	41.22%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	10695	74,895	14.28%
Black, Non-Hispanic	5615	15,845	35.44%
Hispanic	2170	7,000	31.00%
Asian or Pacific Islander, Non-Hispanic	4795	11,330	42.32%
Native American, Non-Hispanic	195	590	33.05%
Total	23,470	109,660	21.40%

Demographics of Households with Severe Housing Cost Burden	
Households with Severe Housing Cost Burden	**Jurisdiction**

Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	9650	74,895	12.88%
Black, Non-Hispanic	4320	15,845	27.26%
Hispanic	1425	7,000	20.36%
Asian or Pacific Islander, Non-Hispanic	2290	11,330	20.21%
Native American, Non-Hispanic	160	590	27.12%
Total	17,845	109,660	16.27%
Household Type and Size			
Family households, <5 people	6764	50530	13.39%
Family households, 5+ people	1579	11380	13.88%
Non-family households	10120	50650	19.98%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

St. Paul experiences the highest rates of housing problems in the Region, and these numbers are especially high for Black, Hispanic, Asian or Pacific Islander and Native American residents. Over 50% of all non-white populations experience housing problems, as opposed to 29.41% of white residents. Large families are also particularly affected. Asian or Pacific Islander residents experience the highest rate of severe housing problems at 42.32%, While 35.44% of Black residents, 31.00% of Hispanic residents and 33.05% of Native American residents experience severe housing problems. In contrast, 14.28% of white residents experience severe housing problems. Similarly, all non-white populations experience rates of severe cost burden above 20%, while 12.88% of white residents do.

Table 12: Housing Problems, Washington County

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	17,072	77,293	22.09%
Black, Non-Hispanic	1,148	2,624	43.75%
Hispanic	789	2,195	35.95%
Asian or Pacific Islander, Non-Hispanic	721	3,423	21.06%
Native American, Non-Hispanic	28	199	14.07%

Total	19,758	85,734	23.05%
Household Type and Size			
Family households, <5 people	9340	54950	17.00%
Family households, 5+ people	2208	7720	28.60%
Non-family households	8624	24328	35.45%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	7355	77,293	9.52%
Black, Non-Hispanic	699	2,624	26.64%
Hispanic	501	2,195	22.82%
Asian or Pacific Islander, Non-Hispanic	368	3,423	10.75%
Native American, Non-Hispanic	20	199	10.05%
Total	8,943	85,734	10.43%

Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden	**Jurisdiction**		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	6651	77,293	8.60%
Black, Non-Hispanic	540	2,624	20.58%
Hispanic	344	2,195	15.67%
Asian or Pacific Islander, Non-Hispanic	143	3,423	4.18%
Native American, Non-Hispanic	0	199	0.00%
Total	7,678	85,734	8.96%
Household Type and Size			
Family households, <5 people	3404	54950	6.19%
Family households, 5+ people	345	7720	4.47%
Non-family households	4063	24328	16.70%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

Washington County experiences housing needs at comparable if not slightly lower rates as the Region as a whole. Black residents experience housing problems, severe housing problems and severe housing cost burden most frequently, followed by Hispanic residents. 35.71% of Black residents and 31.41% of Hispanic residents experience housing problems in the County. Noticeably, Asian or Pacific Islander residents experience housing needs at similar or lower rates than white residents.

Table 13: Housing Problems, Woodbury

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	3,765	19,735	19.08%
Black, Non-Hispanic	475	1,330	35.71%
Hispanic	245	780	31.41%
Asian or Pacific Islander, Non-Hispanic	330	1,950	16.92%
Native American, Non-Hispanic	0	40	0.00%
Total	4,815	23,835	20.20%
Household Type and Size			
Family households, <5 people	2425	15650	15.50%
Family households, 5+ people	380	2255	16.85%
Non-family households	2085	6385	32.65%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	1525	19,735	7.73%
Black, Non-Hispanic	350	1,330	26.32%
Hispanic	150	780	19.23%
Asian or Pacific Islander, Non-Hispanic	160	1,950	8.21%

Native American, Non-Hispanic	0	40	0.00%
Total	2,185	23,835	9.17%

Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden	**Jurisdiction**		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	1475	19,735	7.47%
Black, Non-Hispanic	215	1,330	16.17%
Hispanic	140	780	17.95%
Asian or Pacific Islander, Non-Hispanic	85	1,950	4.36%
Native American, Non-Hispanic	0	40	0.00%
Total	1,915	23,835	8.03%
Household Type and Size			
Family households, <5 people	910	15650	5.81%
Family households, 5+ people	75	2255	3.33%
Non-family households	935	6385	14.64%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

Woodbury experiences slightly lower rates of housing problems than the Region, at an overall rate of 20.20%. Rates are higher for Black and Hispanic residents at 35.71% and 31.41%.While the average rate of severe housing problems for the City is 9.17%, Black residents are nearly three times as likely to experience severe housing problems at 26.32%. Severe cost burden is similarly less impactful in Woodbury than in the Region, though Hispanic residents are most likely to experience severe cost burden at 17.95%.

Table 14: Housing Problems, Scott County

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	7,668	34,475	22.24%

Black, Non-Hispanic	404	960	42.08%
Hispanic	597	1,045	57.13%
Asian or Pacific Islander, Non-Hispanic	594	2,265	26.23%
Native American, Non-Hispanic	53	259	20.46%
Total	9,316	39,004	23.88%
Household Type and Size			
Family households, <5 people	4580	25473	17.98%
Family households, 5+ people	1309	4194	31.21%
Non-family households	3575	9678	36.94%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	2937	34,475	8.52%
Black, Non-Hispanic	263	960	27.40%
Hispanic	359	1,045	34.35%
Asian or Pacific Islander, Non-Hispanic	253	2,265	11.17%
Native American, Non-Hispanic	49	259	18.92%
Total	3,861	39,004	9.90%

Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden	**Jurisdiction**		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	2680	34,475	7.77%
Black, Non-Hispanic	165	960	17.19%
Hispanic	275	1,045	26.32%
Asian or Pacific Islander, Non-Hispanic	148	2,265	6.53%
Native American, Non-Hispanic	39	259	15.06%
Total	3,307	39,004	8.48%

Household Type and Size			
Family households, <5 people	1520	25473	5.97%
Family households, 5+ people	282	4194	6.72%
Non-family households	1570	9678	16.22%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

Scott County experiences housing needs at lower rates than the Region, though different racial/ethnic groups still experience needs at differing rates, with Hispanic residents experiencing housing needs most frequently. While 9.90% of total residents experience severe housing problems, 27.40% of Black and 34.35% of Hispanic residents experience severe housing problems. 17.19% of Black and 26.32% of Hispanic residents experience severe cost burden, while 8.48% of residents overall do.

Table 15: Housing Problems, Carver County

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	6,453	29,170	22.12%
Black, Non-Hispanic	95	275	34.55%
Hispanic	346	816	42.40%
Asian or Pacific Islander, Non-Hispanic	100	647	15.46%
Native American, Non-Hispanic	79	83	95.18%
Total	7,073	30,991	22.82%
Household Type and Size			
Family households, <5 people	3486	19800	17.61%
Family households, 5+ people	723	3407	21.22%
Non-family households	2890	8096	35.70%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			

White, Non-Hispanic	2667	29,170	9.14%
Black, Non-Hispanic	20	275	7.27%
Hispanic	287	816	35.17%
Asian or Pacific Islander, Non-Hispanic	55	647	8.50%
Native American, Non-Hispanic	59	83	71.08%
Total	3,088	30,991	9.96%

Demographics of Households with Severe Housing Cost Burden			
Households with Severe Housing Cost Burden	**Jurisdiction**		
Race/Ethnicity	**# with severe cost burden**	**# households**	**% with severe cost burden**
White, Non-Hispanic	2425	29,170	8.31%
Black, Non-Hispanic	20	275	7.27%
Hispanic	128	816	15.69%
Asian or Pacific Islander, Non-Hispanic	35	647	5.41%
Native American, Non-Hispanic	19	83	22.89%
Total	2,627	30,991	8.48%
Household Type and Size			
Family households, <5 people	1108	19800	5.60%
Family households, 5+ people	91	3407	2.67%
Non-family households	1435	8096	17.72%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

Residents in Carver County are less likely to experience housing problems, severe housing problems or severe housing cost burden than the Region. While Black and Hispanic residents experience housing problems at rates of 34.55% and 42.40%, the overall rate is 22.82%, likely because of the lower numbers of non-white households in the County. Similarly, while Hispanic residents experience severe housing problems at 35.17%, the overall rate for the County is 9.96%, which is close to the rate for white residents, 9.14%. Hispanic and Native American residents are more likely to experience severe cost burden at 15.69% and 22.89%, much higher than the overall rate of severe housing cost burden is 8.48%. This is primarily concentrated in non-family households as well.

Table 16: Housing Problems, Region

Demographics of Households with Disproportionate Housing Needs			
Disproportionate Housing Needs			
Households experiencing any of 4 housing problems	**# with problems**	**# households**	**% with problems**
Race/Ethnicity			
White, Non-Hispanic	228,679	914,724	25.00%
Black, Non-Hispanic	48,003	87,617	54.79%
Hispanic	22,222	44,578	49.85%
Asian or Pacific Islander, Non-Hispanic	19,671	57,836	34.01%
Native American, Non-Hispanic	1954	5,107	38.26%
Total	320,529	1,109,862	28.88%
Household Type and Size			
Family households, <5 people	127092	620730	20.47%
Family households, 5+ people	37608	91138	41.26%
Non-family households	164053	418143	39.23%
Households experiencing any of 4 Severe Housing Problems	**# with severe problems**	**# households**	**% with severe problems**
Race/Ethnicity			
White, Non-Hispanic	102154	914,724	11.17%
Black, Non-Hispanic	28892	87,617	32.98%
Hispanic	14043	44,578	31.50%
Asian or Pacific Islander, Non-Hispanic	12531	57,836	21.67%
Native American, Non-Hispanic	1,179	5,107	23.09%
Total	158,799	1,109,862	14.31%

Demographics of Households with Severe Housing Cost Burden	
Households with Severe Housing Cost Burden	**Jurisdiction**

Race/Ethnicity	# with severe cost burden	# households	% with severe cost burden
White, Non-Hispanic	93477	914,724	10.22%
Black, Non-Hispanic	22763	87,617	25.98%
Hispanic	7903	44,578	17.73%
Asian or Pacific Islander, Non-Hispanic	6819	57,836	11.79%
Native American, Non-Hispanic	1010	5,107	19.78%
Total	131,972	1,109,862	11.89%
Household Type and Size			
Family households, <5 people	48352	620730	7.79%
Family households, 5+ people	8576	91138	9.41%
Non-family households	78877	418143	18.86%

Source: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016.

In the Region, non-white residents are generally more likely to face housing problems, severe housing problems, and cost burden. This difference is slightly pronounced for Asian or Pacific Islander residents, but more so for Hispanic and especially Black residents. While 25.00% of White residents have housing problems, 54.79% of Black residents, 49.85% of Hispanic residents, 34.01% of Asian or Pacific Islander residents, and 38.26% of Native American residents experience housing problems. The overall rate of experiencing housing problems for the Region is 28.88%. Family households with less than five members are almost half as likely to experience housing problems as family households with five or more members or non-family households. This discrepancy is also visible in rates of severe housing problems, with 11.17% of white residents experiencing severe housing problems compared to 32.98% of Black residents, 31.50% of Hispanic residents, 21.67% of Asian or Pacific Islander residents and 23.09% of Native American residents. Noticeably, white residents are significantly less likely to experience severe housing problems than housing problems when compared to other racial or ethnic groups.

White and Asian or Pacific Islander residents are least likely to experience severe cost burden, with rates of 10.22% and 11.79%, respectively. Black, Hispanic and Native American residents experience severe cost burdens more frequently with rates of 25.98%, 17.73% and 19.78% overall. Non-family households are most likely to experience severe housing cost burden as well.

These numbers are fairly consistent with many parts of the Region, with some notable differences. Black residents in Coon Rapids have the highest rate of housing problems at 60.41%, with similarly high rates in Hennepin County, Eden Prairie, and St. Paul. Hispanic residents face higher rates of housing problems in Hennepin County, St. Paul, and Scott County.

Black residents experience higher rates of severe housing cost burden in Hennepin County, Minneapolis, Minnetonka, and St. Paul. They also experience disproportionately high rates of severe housing problems in Eden Prairie and Minnetonka.

Hispanic residents face especially high rates of housing problems I St. Paul and Scott County, as well as higher rates of severe housing problems in St. Paul.

Asian or Pacific Islander residents experience higher rates of housing burdens in Ramsey County, but are fairly consistent with values for the Region overall.

Table 17: Percentage of Overcrowded Households by Race or Ethnicity, 2013-2017 American Community Survey

	Black or African American	Asian or Pacific Islander	White, Non-Hispanic	Native American or American Indian	Hispanic
Anoka County, Minnesota	8.20%	5.93%	0.98%	4.38%	15.35%
Carver County, Minnesota	16.44%	2.70%	0.74%	56.41%	9.25%
Dakota County, Minnesota	5.51%	4.16%	0.67%	0.00%	8.56%
Hennepin County, Minnesota	8.66%	7.15%	0.65%	4.15%	18.98%
Ramsey County, Minnesota	8.84%	21.04%	1.00%	7.02%	11.32%
Scott County, Minnesota	13.59%	5.71%	1.02%	0.00%	13.78%
Washington County, Minnesota	8.41%	6.28%	0.69%	13.33%	6.46%
Bloomington city, Minnesota	10.86%	7.87%	0.67%	7.92%	20.53%
Coon Rapids city, Minnesota	5.23%	2.35%	1.06%	0.00%	17.58%
Eden Prairie city, Minnesota	24.09%	4.02%	0.56%	0.00%	13.48%
Minneapolis city, Minnesota	9.14%	10.11%	1.09%	3.64%	19.96%
Minnetonka city, Minnesota	7.97%	1.25%	0.37%	0.00%	2.30%
Plymouth city, Minnesota	2.57%	2.95%	0.35%	19.40%	9.46%
St. Paul city, Minnesota	9.26%	27.26%	1.20%	10.57%	12.63%
Woodbury city, Minnesota	11.90%	3.03%	0.32%	0.00%	1.46%
Minneapolis-St. Paul-Bloomington, MN-WI Metro Area	8.53%	10.65%	0.86%	5.67%	14.27%

Source: American Community Survey Estimates, 2013-2017.

Anoka County
In Anoka County, 0.98% of white households experience overcrowding, as opposed to 8.20% of Black households and 15.35% of Hispanic households. 5.93% of Asian or Pacific Islander households and 4.38% of Native American households experience overcrowding.

Coon Rapids
Hispanic households experience the most overcrowding at 17.58%, as compared to 1.06% of white households, 5.23% of Black households, and 2.35% of Asian or Pacific Islander households.

Dakota County
Rates of overcrowding are lower in Dakota County than in the Region overall. 5.51% of Black households, 4.16% of Asian or Pacific Islander households, 0.67% of white households and 8.56% of Hispanic households experience overcrowding.

Hennepin County
Hennepin County residents experience more overcrowding than average for the Region. 8.66% of Black households, 7.15% of Asian or Pacific Islander households, 0.65% of white households, and 4.15% of Native American households experience overcrowding. Hispanic households are the most likely to experience overcrowding at 18.98%, amongst the highest rates in the Region.

Bloomington
Bloomington also experiences overcrowding at higher rates for the Region. Hispanic households in Bloomington experience the most overcrowding of Hispanic residents in the Region at 20.53%, followed by 10.86% of Black households, 7.92% of Native American households, 7.87% of Asian American or Pacific Islander households, and 0.67% of white households.

Eden Prairie
Black households in Eden Prairie experience amongst the highest rates of overcrowding in the Region at 24.09%. 4.02% of Asian American or Pacific Islander households, experience overcrowding, along with 0.56% of Native American households and 13.48% of Hispanic households.

Minneapolis
Hispanic households experience the highest rates of overcrowding in Minneapolis at 19.96%, followed by 10.11% of Asian American or Pacific Islander households, 9.14% of Black households, 3.64% of Native American households and 1.09% of white households.

Minnetonka
Minnetonka for the most part does not experience as much overcrowding as other parts of the Region. 7.97% of Black households, 1.25% of Asian American of Pacific Islander households, 0.37% of white households and 2.30% of Hispanic households experience overcrowding.

Plymouth
Residents in Plymouth experience less overcrowding than average for the Region. 2.57% of Black households, 2.95% of Asian American or Pacific Islander households, 0.35% of white households

and 9.46% of Hispanic households experience overcrowding. Noticeably, 19.40% of Native American households experience overcrowding.

Ramsey County
Asian American or Pacific Islander households in Ramsey County experience some of the highest rates of overcrowding for Asian American or Pacific Islander households for the Region, at 21.04%. Black households experience overcrowding at a rate of 8.84%, white residents 1.00%, Native American residents 7.02%, and Hispanic residents 11.32%.

St. Paul
Residents of St. Paul are more likely to experience overcrowding than average for the Region. 27.26% of Asian American or Pacific Islander households, followed by 12.63% of Hispanic households,10.57% of Native American households, and 9.26% of Black households experience overcrowding. Just 1.20% of white residents experience overcrowding.

Washington County
In Washington County, 8.41% of Black, 6.28% of Asian or Pacific Islander, 0.69% of white, 13.33% of Native American and 6.46% of Hispanic households experience overcrowding.

Woodbury
In Woodbury, Black households are most likely to experience overcrowding at a rate of 11.90%. Just 3.03% of Asian or Pacific Islander households, 0.32% of white households and 1.46% of Hispanic households also experience overcrowding.

Scott County
Scott County experiences average amounts of overcrowding for the Region, though Black and Hispanic households are particularly affected at 13.59% and 13.78%, respectively. Asian or Pacific Islander households experience overcrowding at a rate of 5.71%, and 1.02% of white households experience overcrowding.

Carver County
Non-white households in Carver County experience high levels of overcrowding. Native American households experience the highest rate of overcrowding at 56.41%, compared to 16.454% of Black households, 2.70% of Asian or Pacific Islander households, 9.25% of Hispanic households, and just 0.74% of white households.

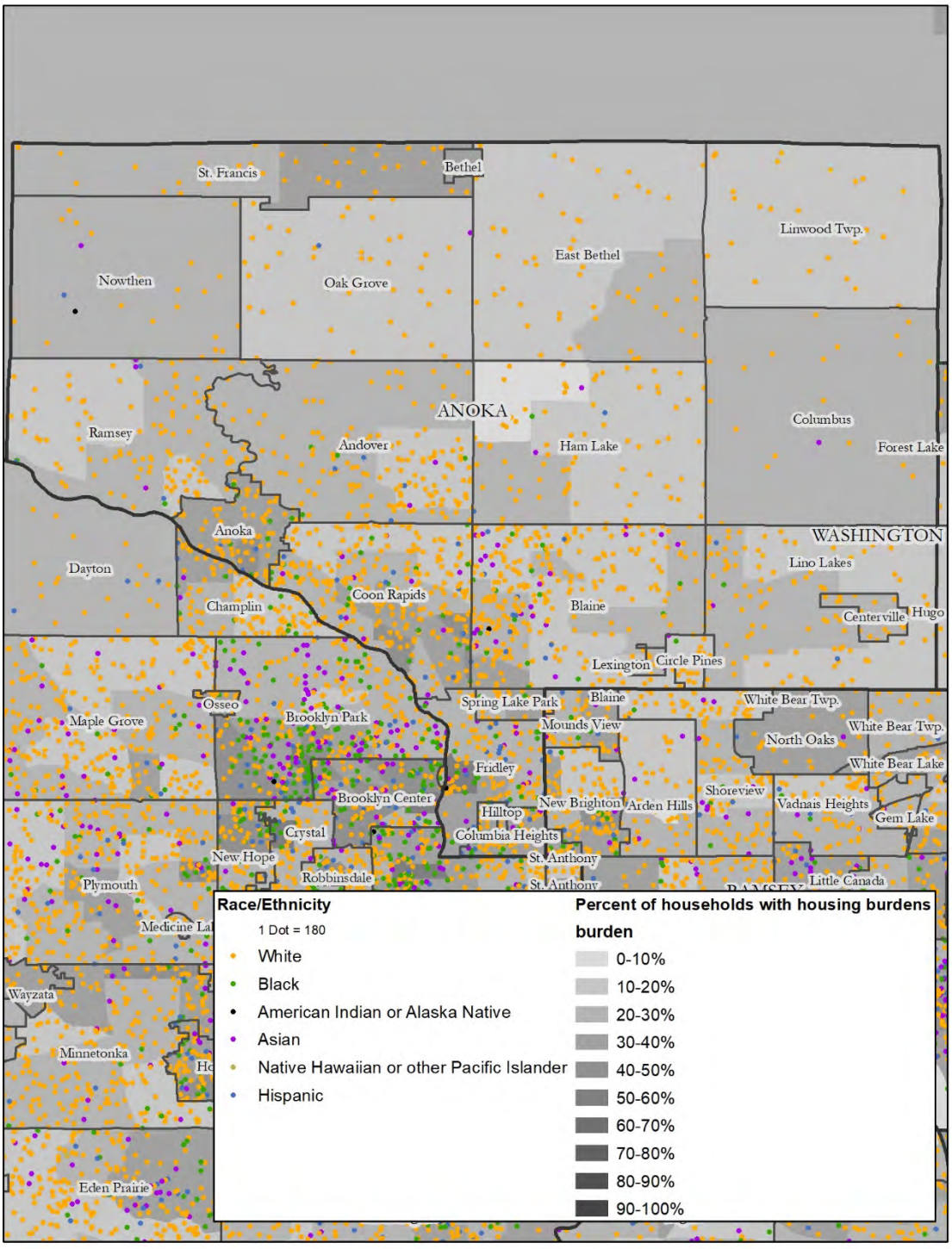
Region
In the Region, 8.53% of Black households, 10.65% of Asian American or Pacific Islander households, 0.86% of white households, 5.67% of Native American households and 14.27% of Hispanic households experience overcrowding.

Non-white households are significantly and disproportionately affected by overcrowding. In no County or City does the percentage of white households experiencing overcrowding exceed 2%. Black and Hispanic households are consistently more affected by overcrowding in every County and City, with figures often reaching over 10%. Overcrowding reaches rates of 24.09% for Black households in Eden Prairie, and 20.53% for Hispanic households in Bloomington. Asian or Pacific

Islander households are not as affected in most Counties and Cities, with the exceptions of St. Paul, Ramsey County, and Minneapolis.

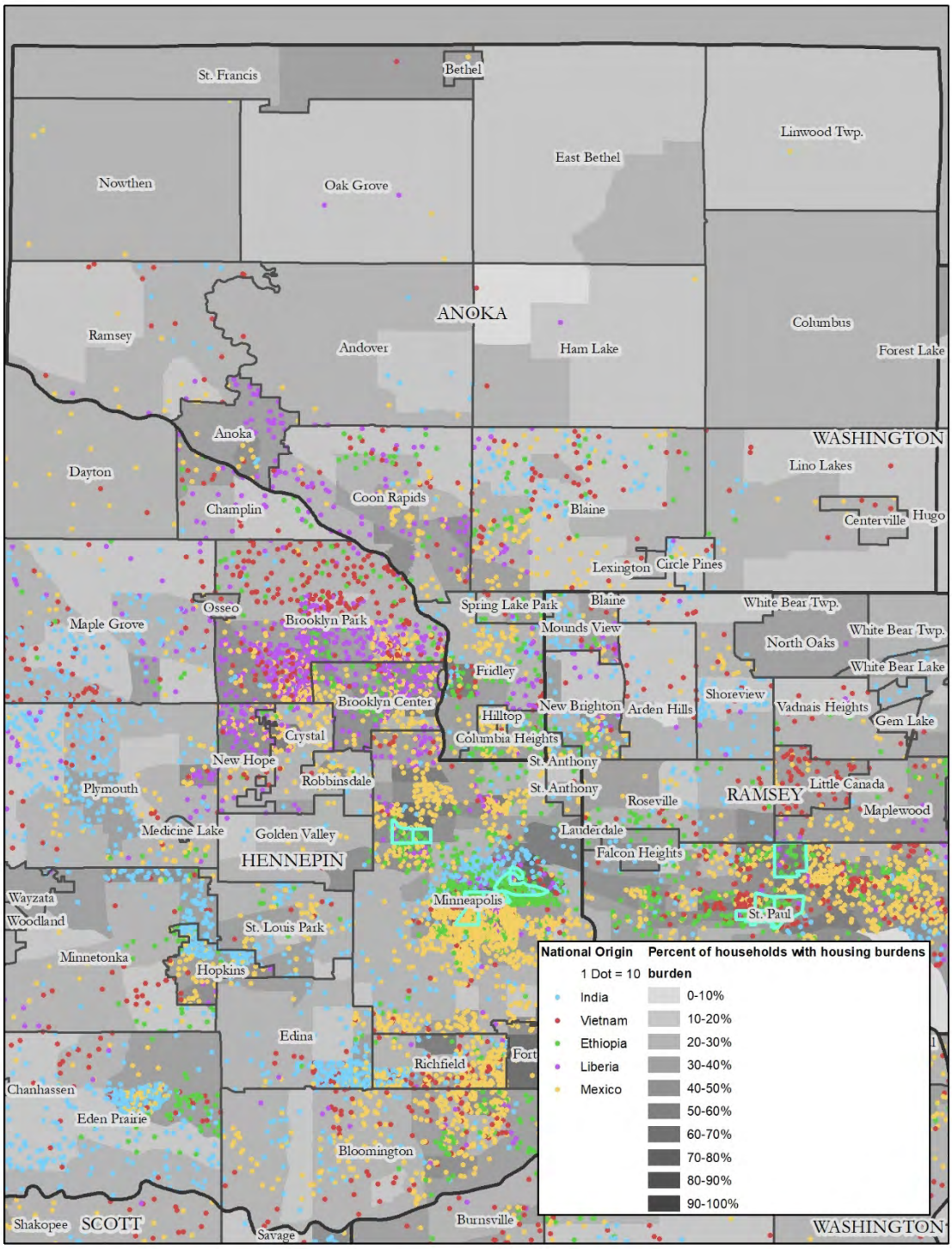
2. *Which areas in the jurisdiction and Region experience the greatest housing burdens? Which of these areas align with segregated areas, integrated areas, or R/ECAPs and what are the predominant race/ethnicity or national origin groups in such areas?*

Map 1: Housing Problems in Anoka County, Race[7]



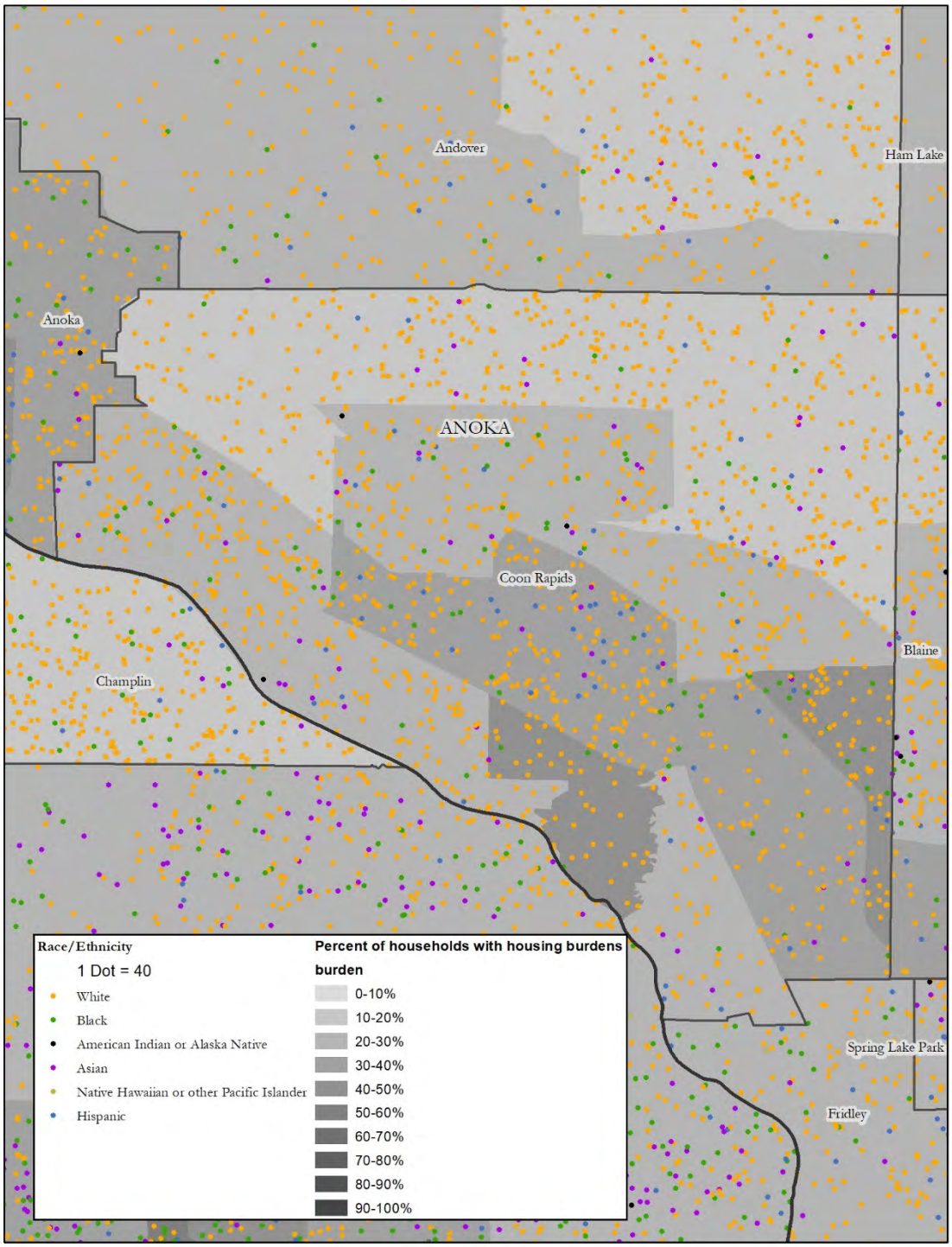
[7] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 2: Housing Problems in Anoka County, National Origin[8]



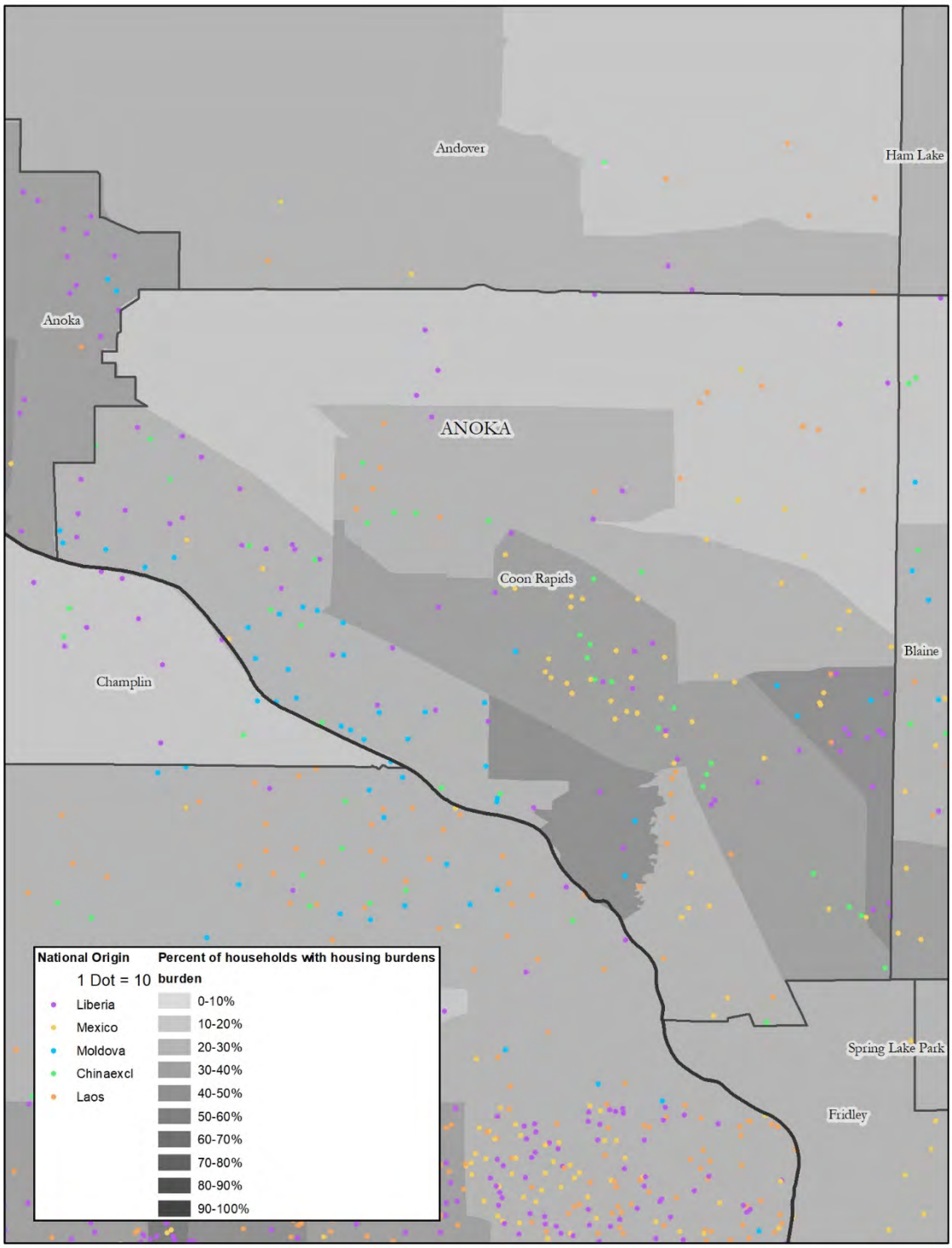
[8] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 3: Housing Problems in Coon Rapids, Race[9]



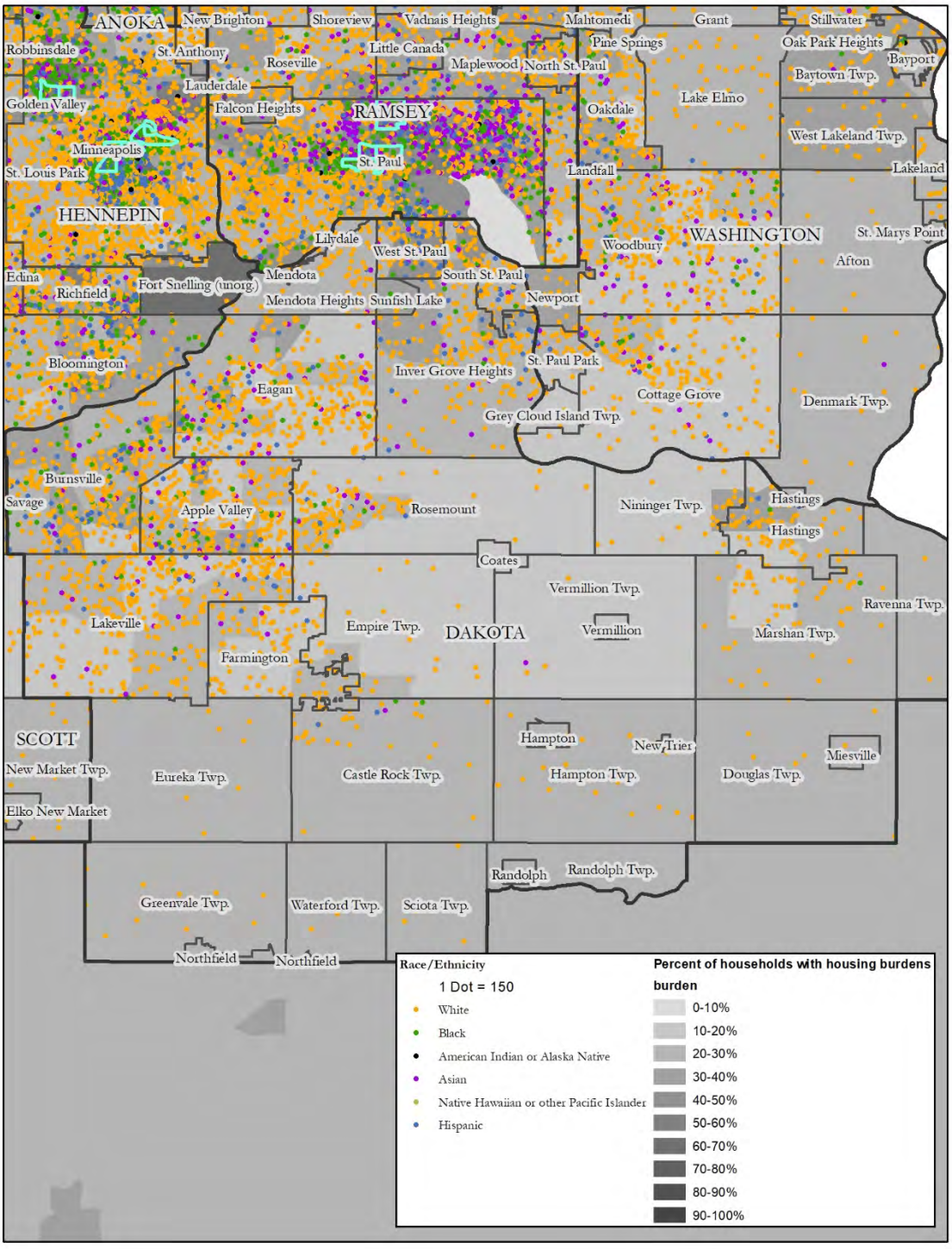
[9] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 4: Housing Problems in Coon Rapids, National Origin[10]



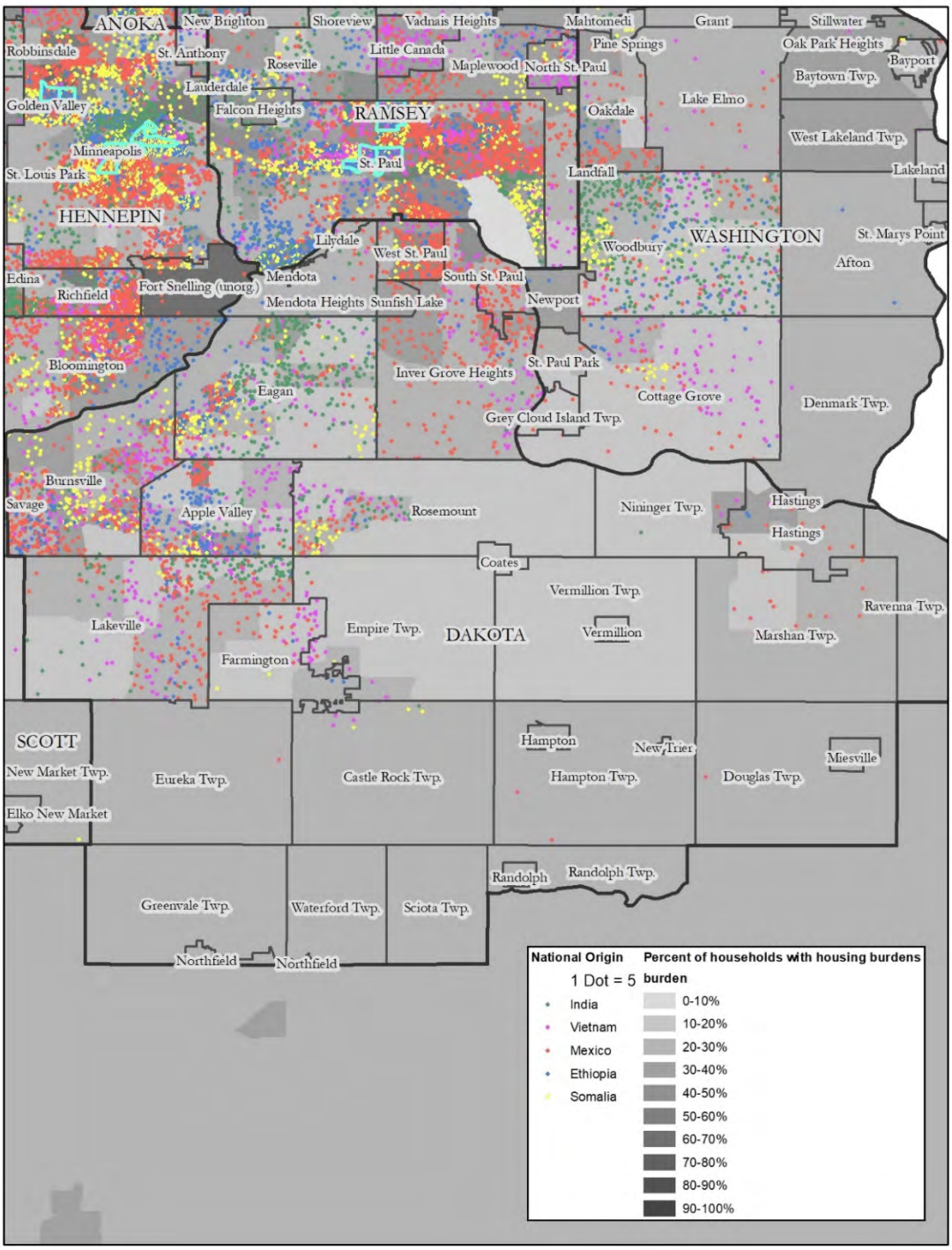
[10] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 5: Housing Problems in Dakota County, Race[11]



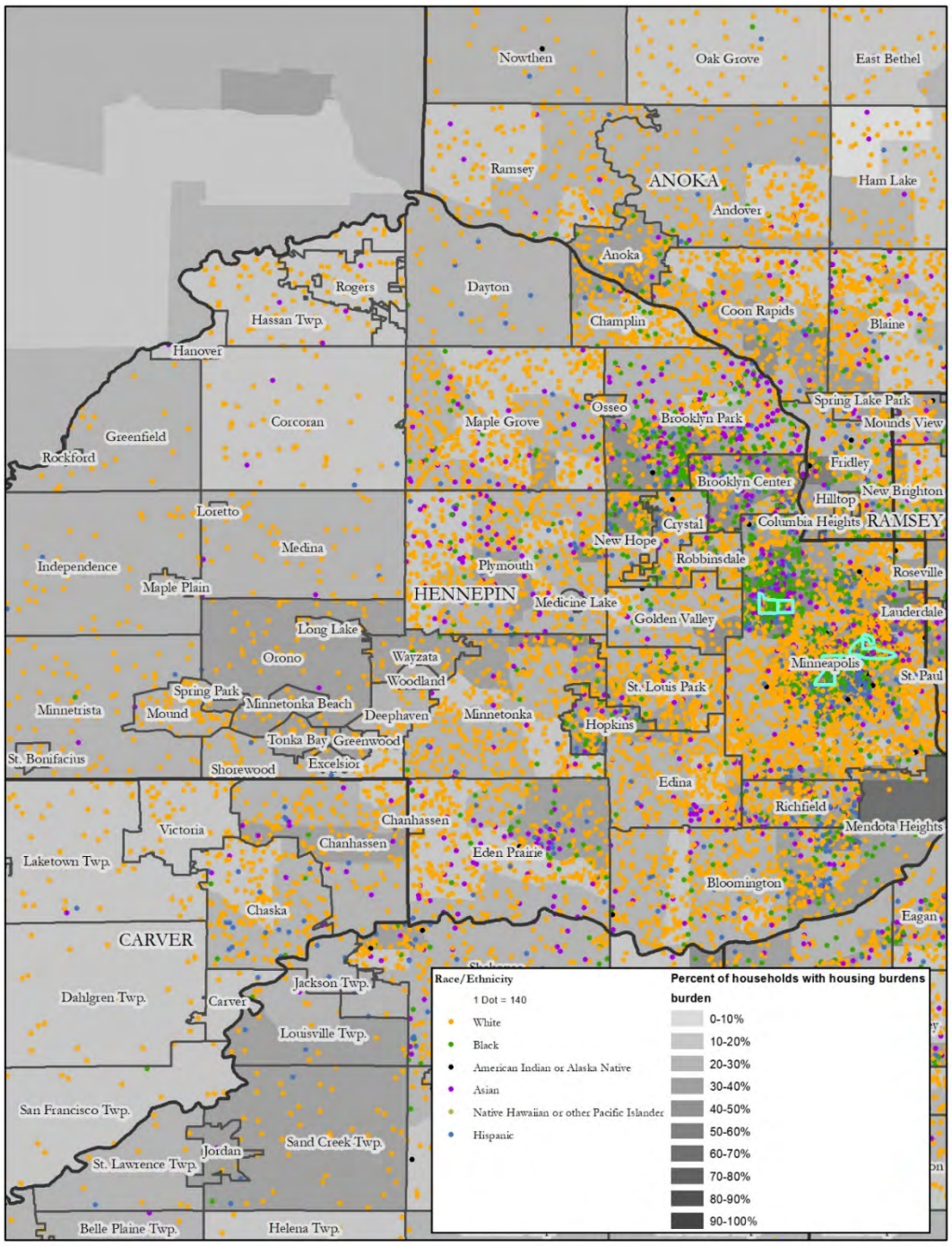
[11] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 6: Housing Problems in Dakota County, National Origin[12]



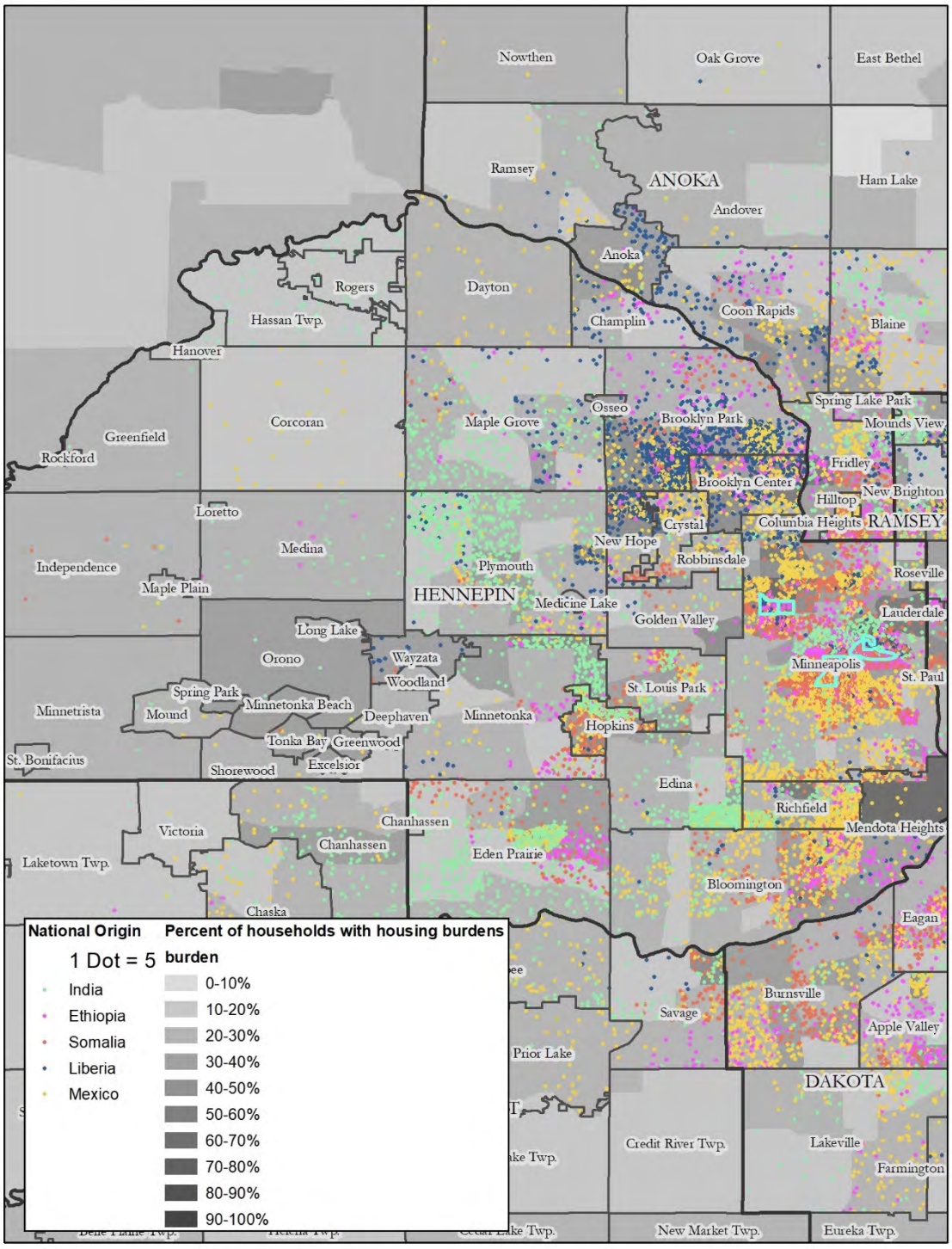
[12] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 7: Housing Problems in Hennepin County, Race[13]



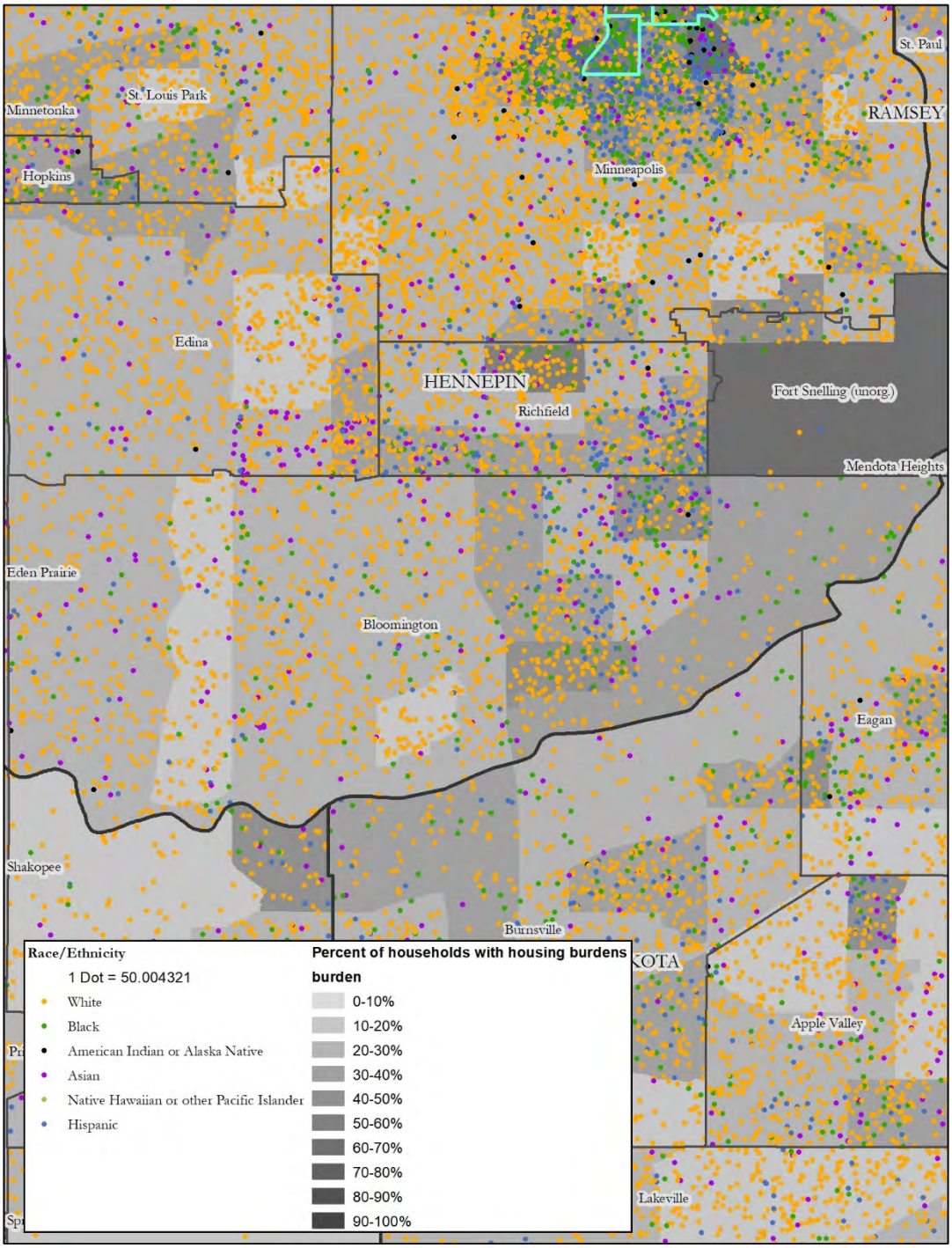
[13] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 8: Housing Problems in Hennepin County, National Origin[14]



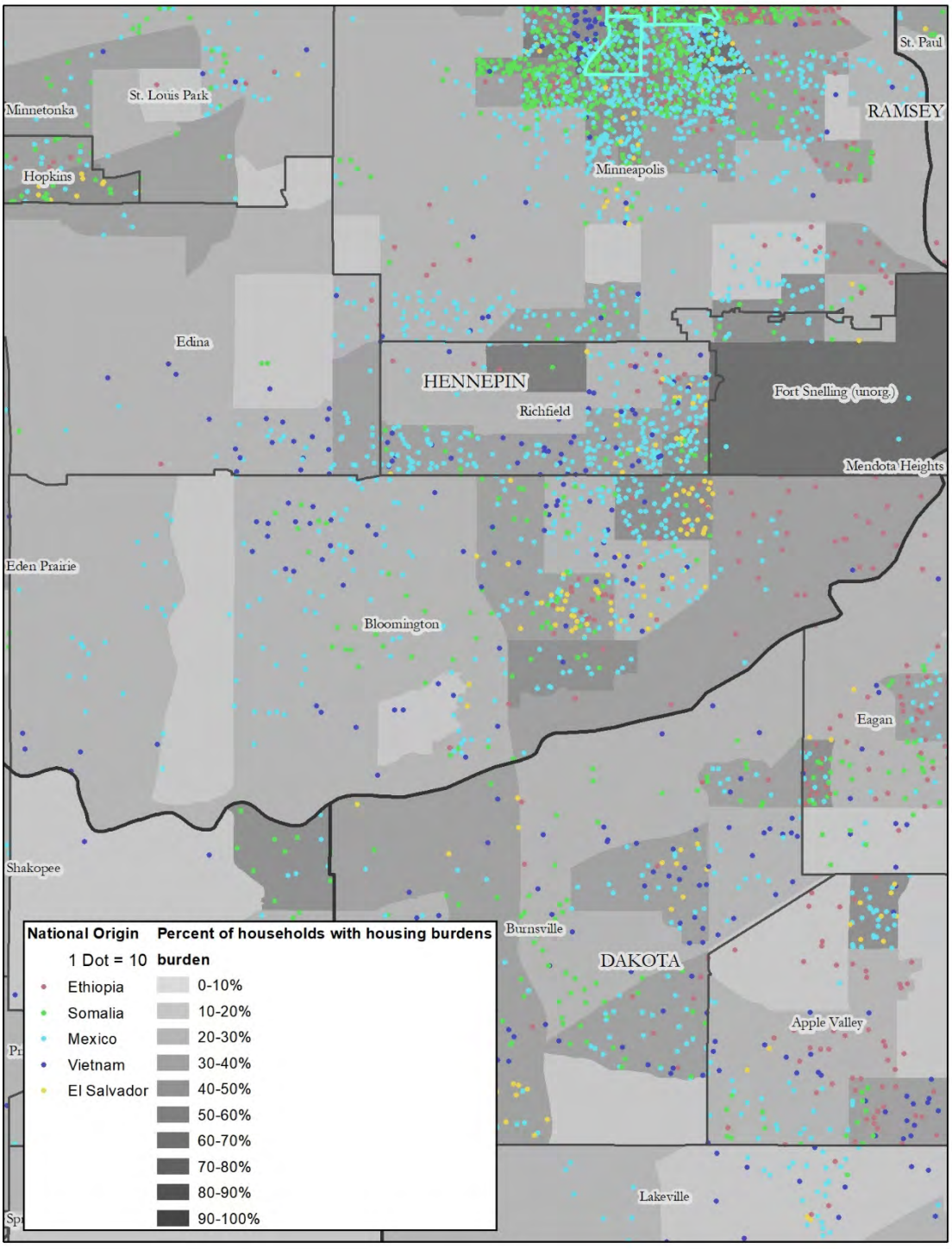
[14] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 9: Housing Problems in Bloomington, Race[15]



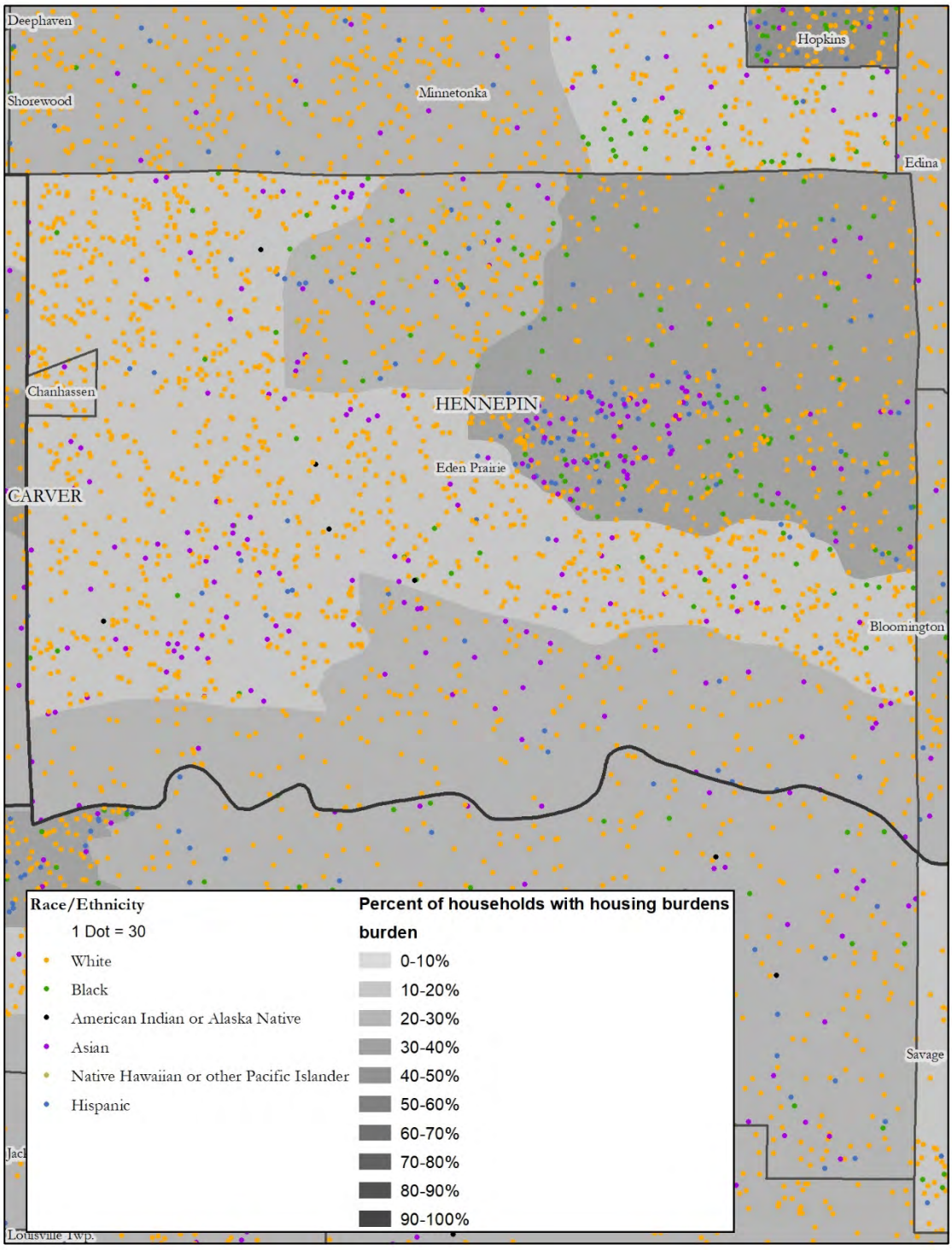
[15] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 10: Housing Problems in Bloomington, National Origin[16]



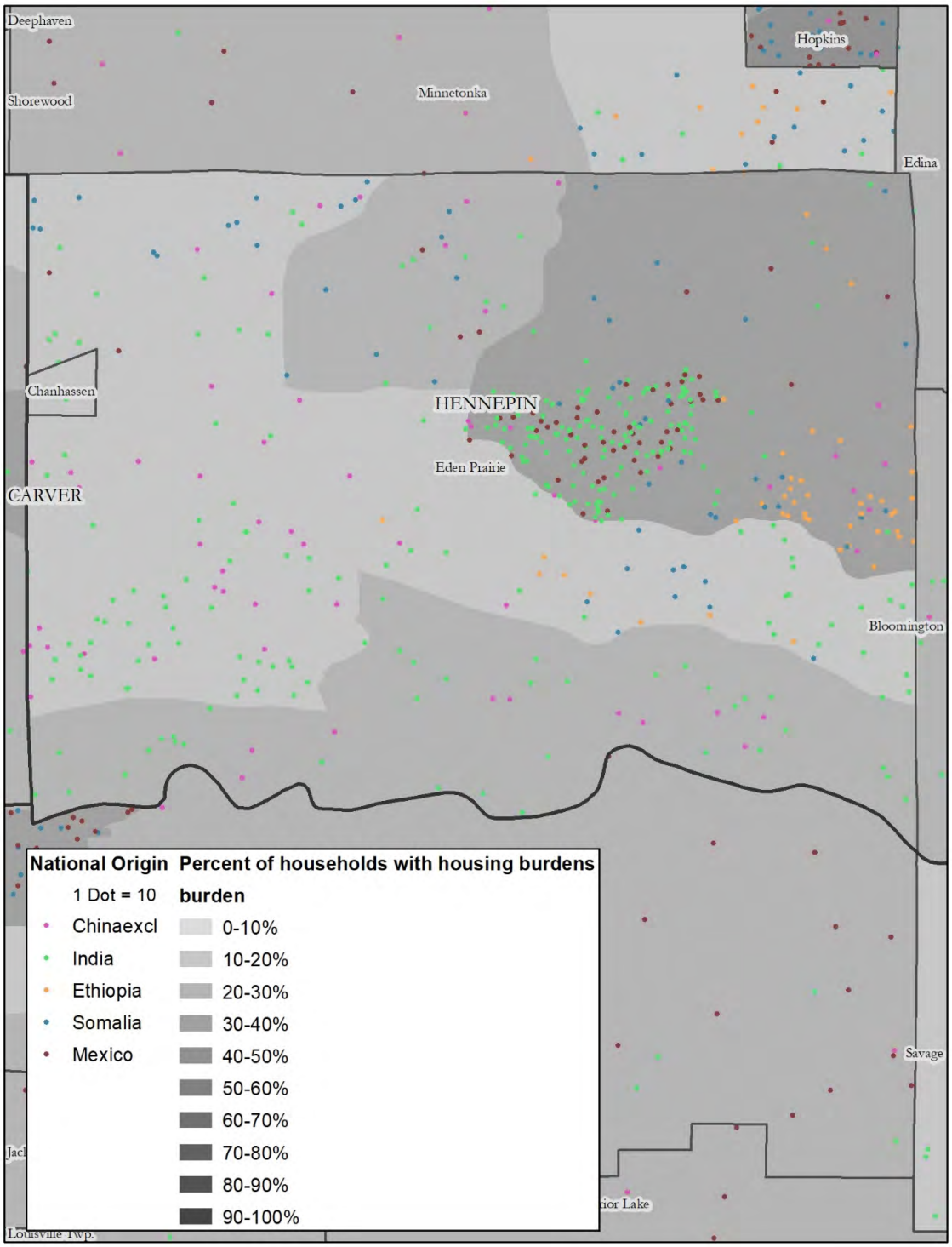
[16] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 11: Housing Problems in Eden Prairie, Race[17]



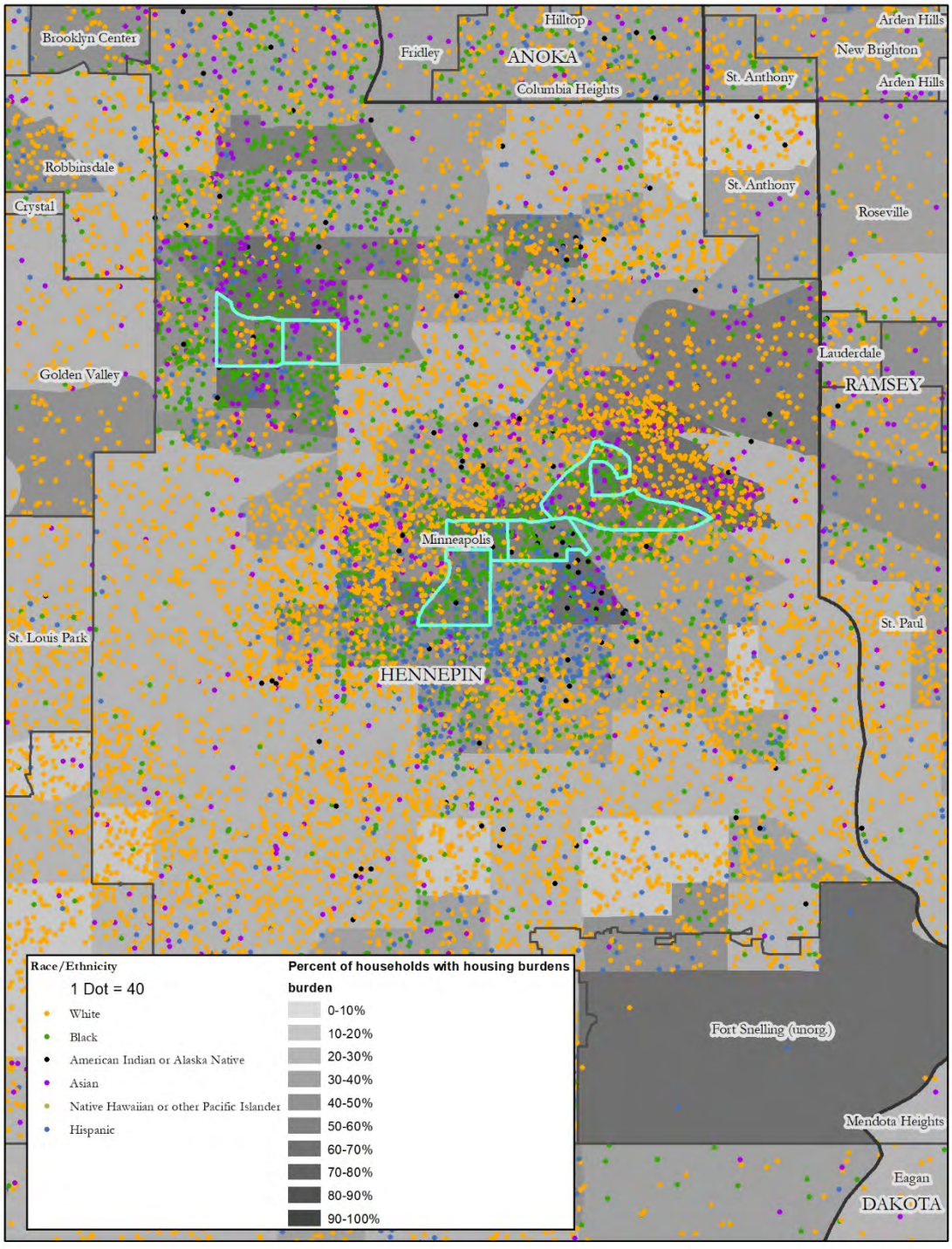
[17] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 12: Housing Problems in Eden Prairie, National Origin[18]



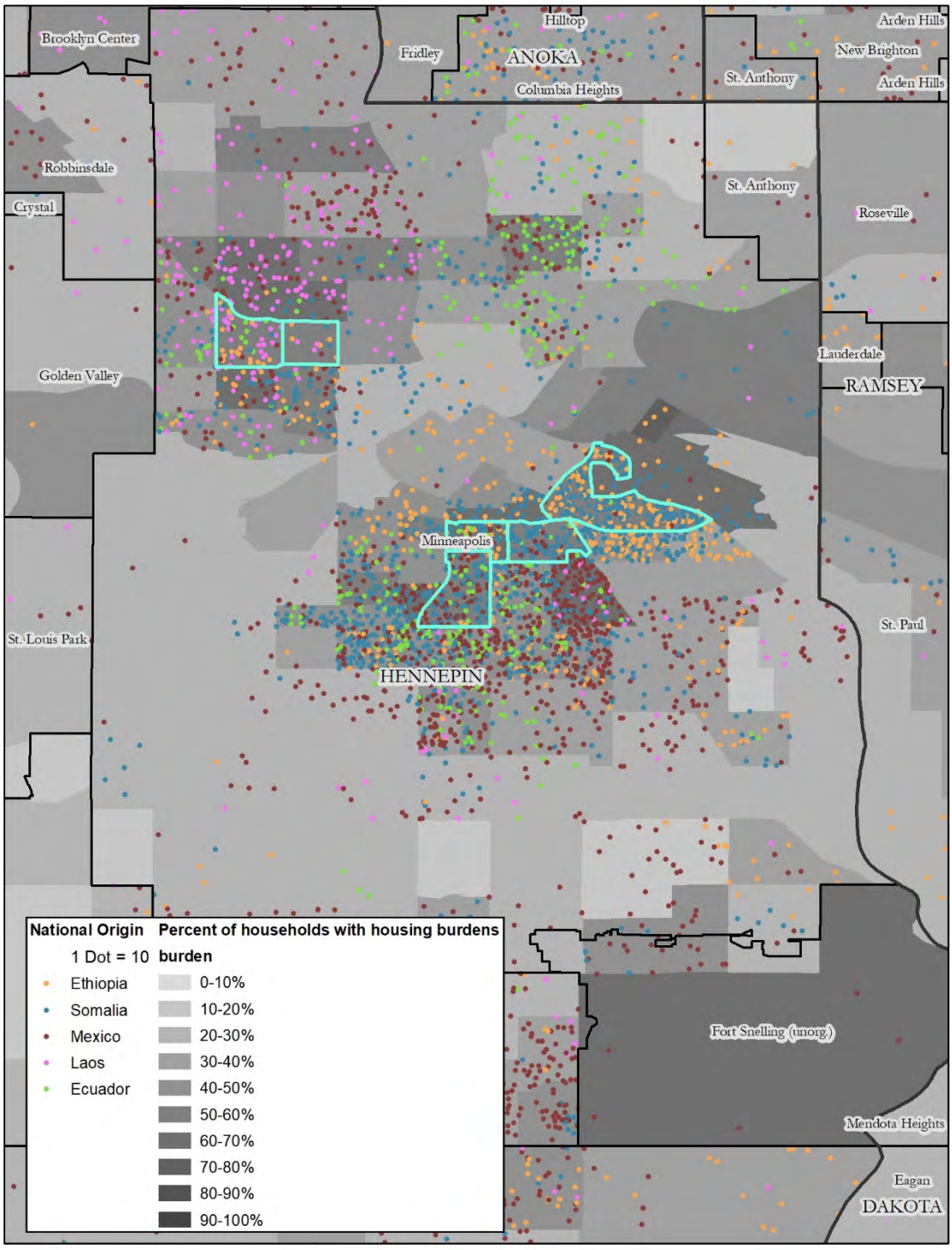
[18] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 13: Housing Problems in Minneapolis, Race[19]



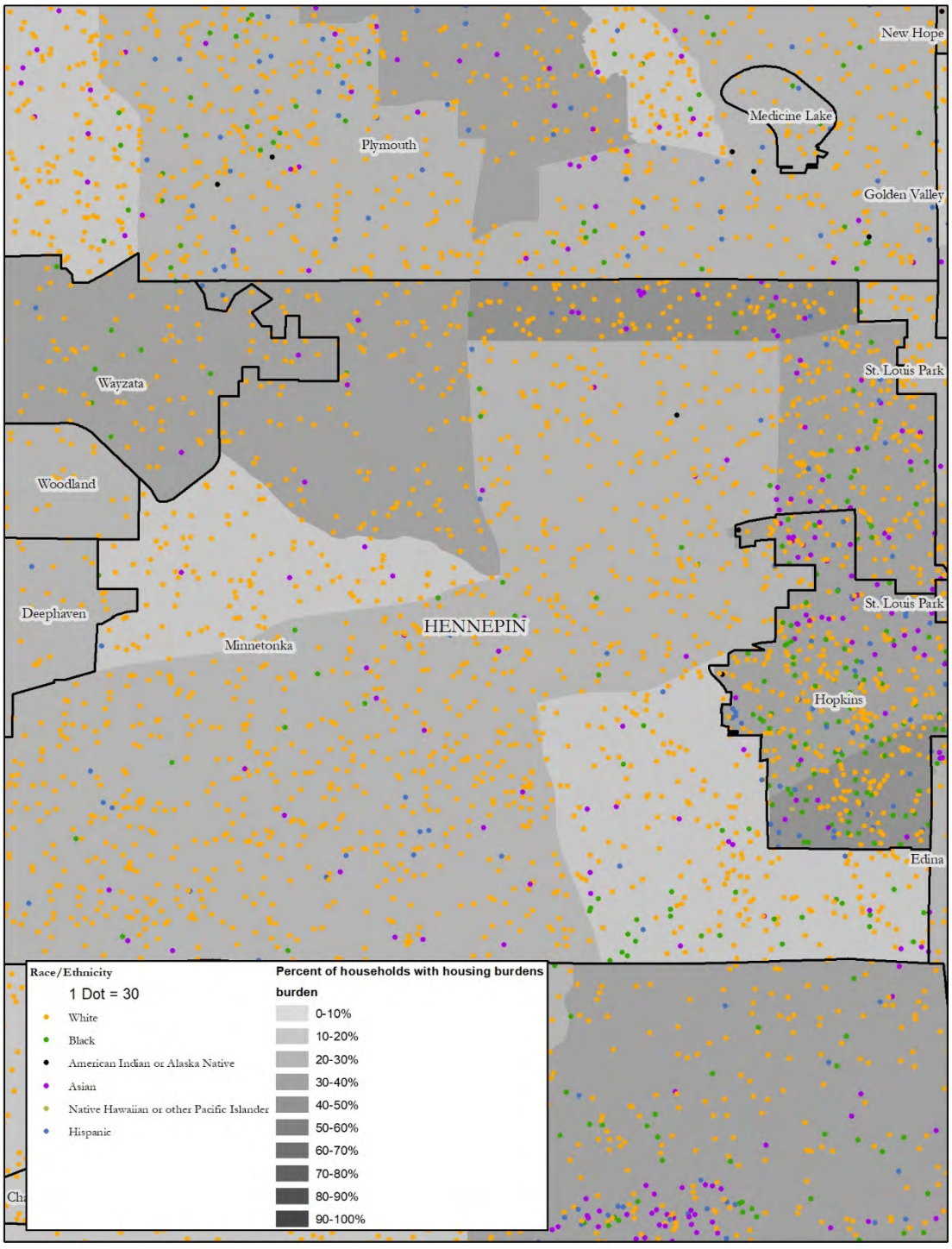
[19] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 14: Housing Problems in Minneapolis, National Origin[20]



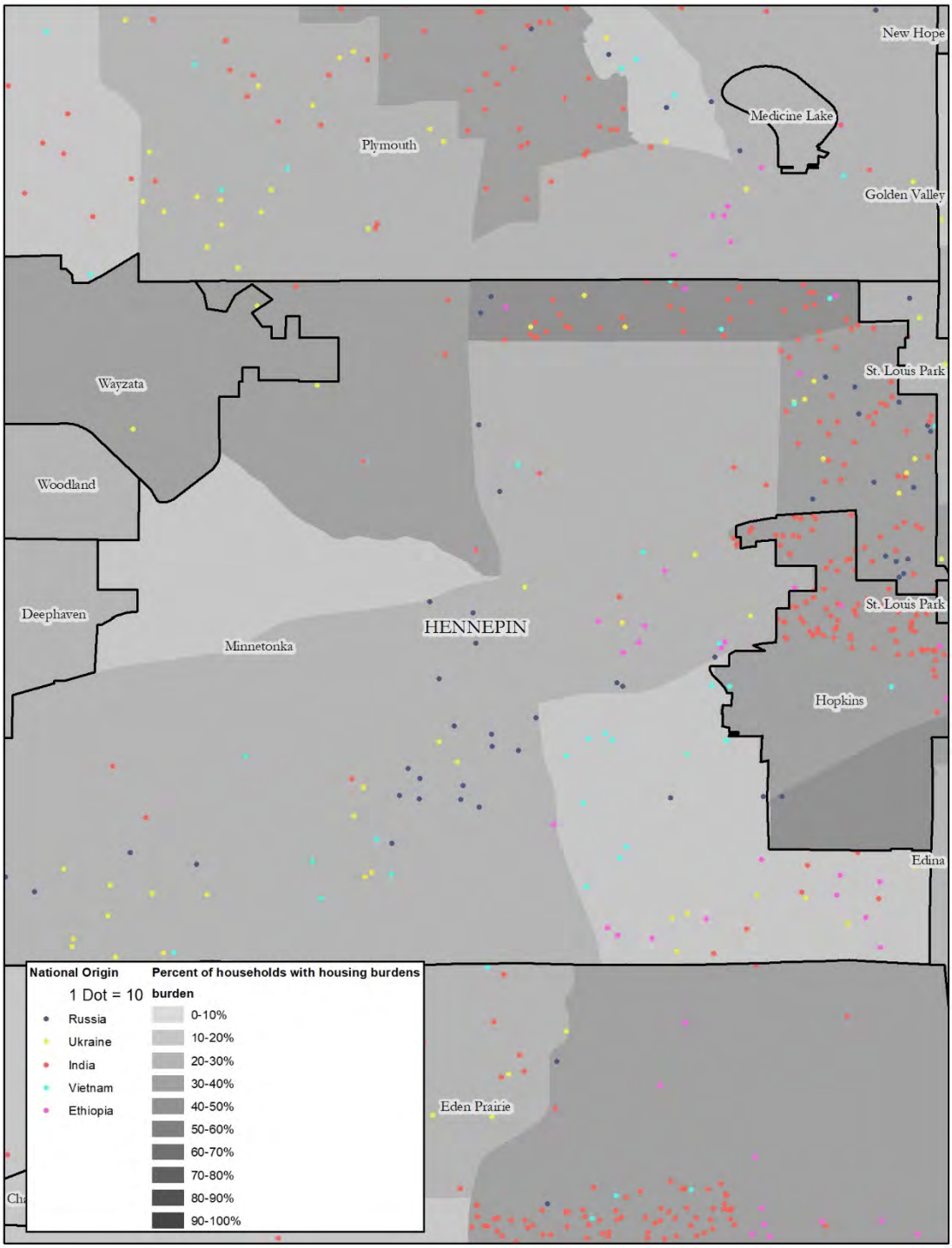
[20] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 15: Housing Problems in Minnetonka, Race[21]



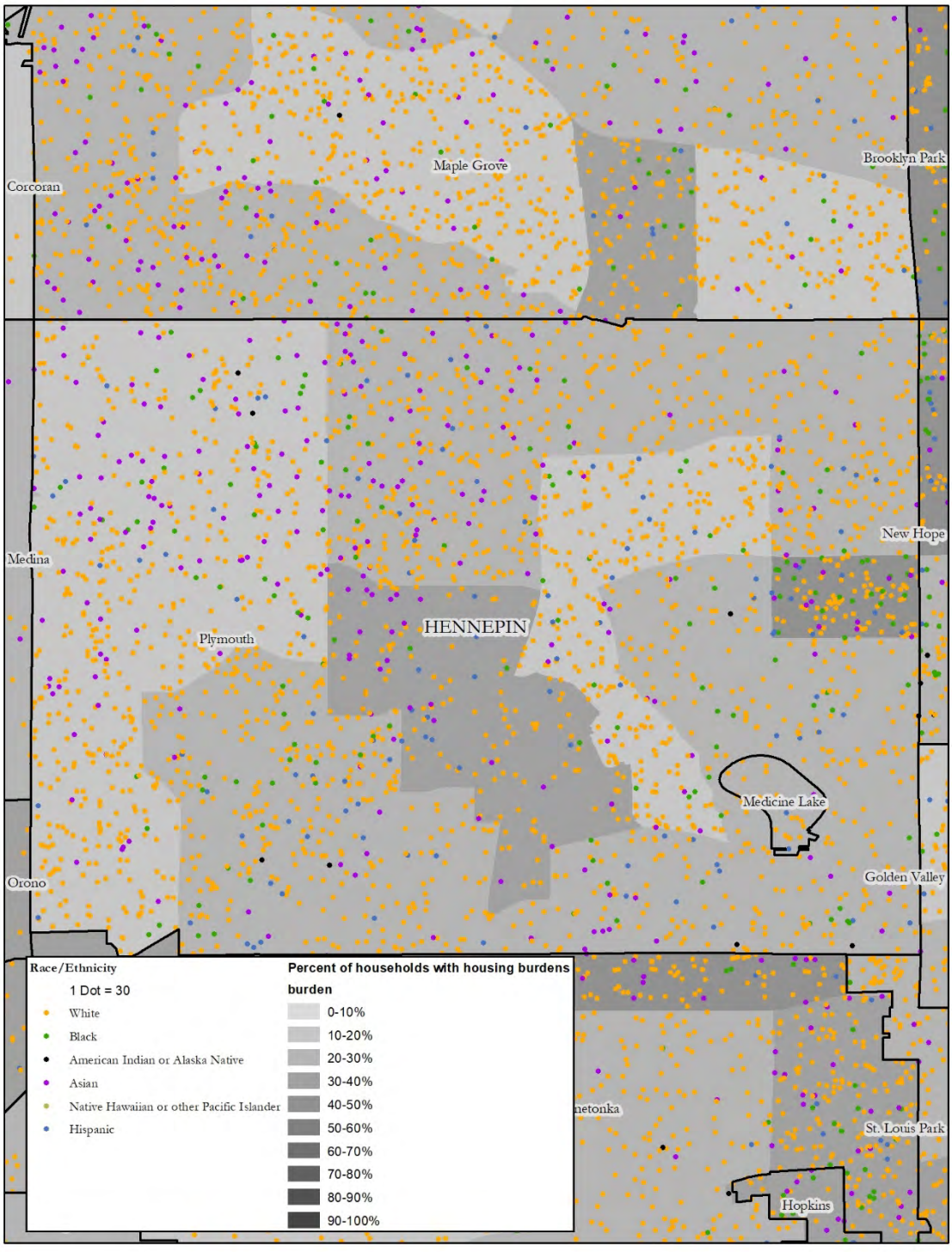
[21] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 16: Housing Problems in Minnetonka, National Origin[22]



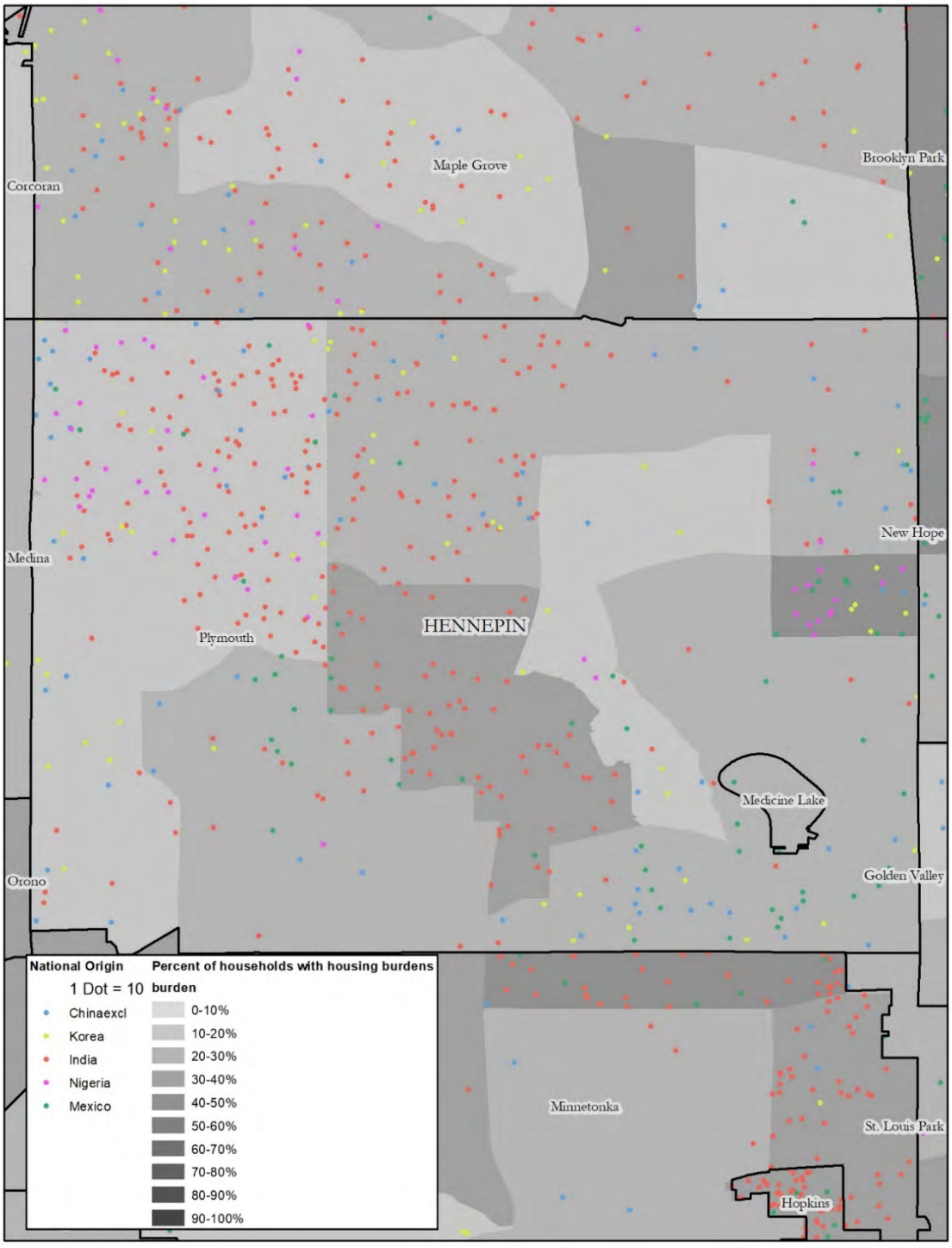
[22] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 17: Housing Problems in Plymouth, Race[23]



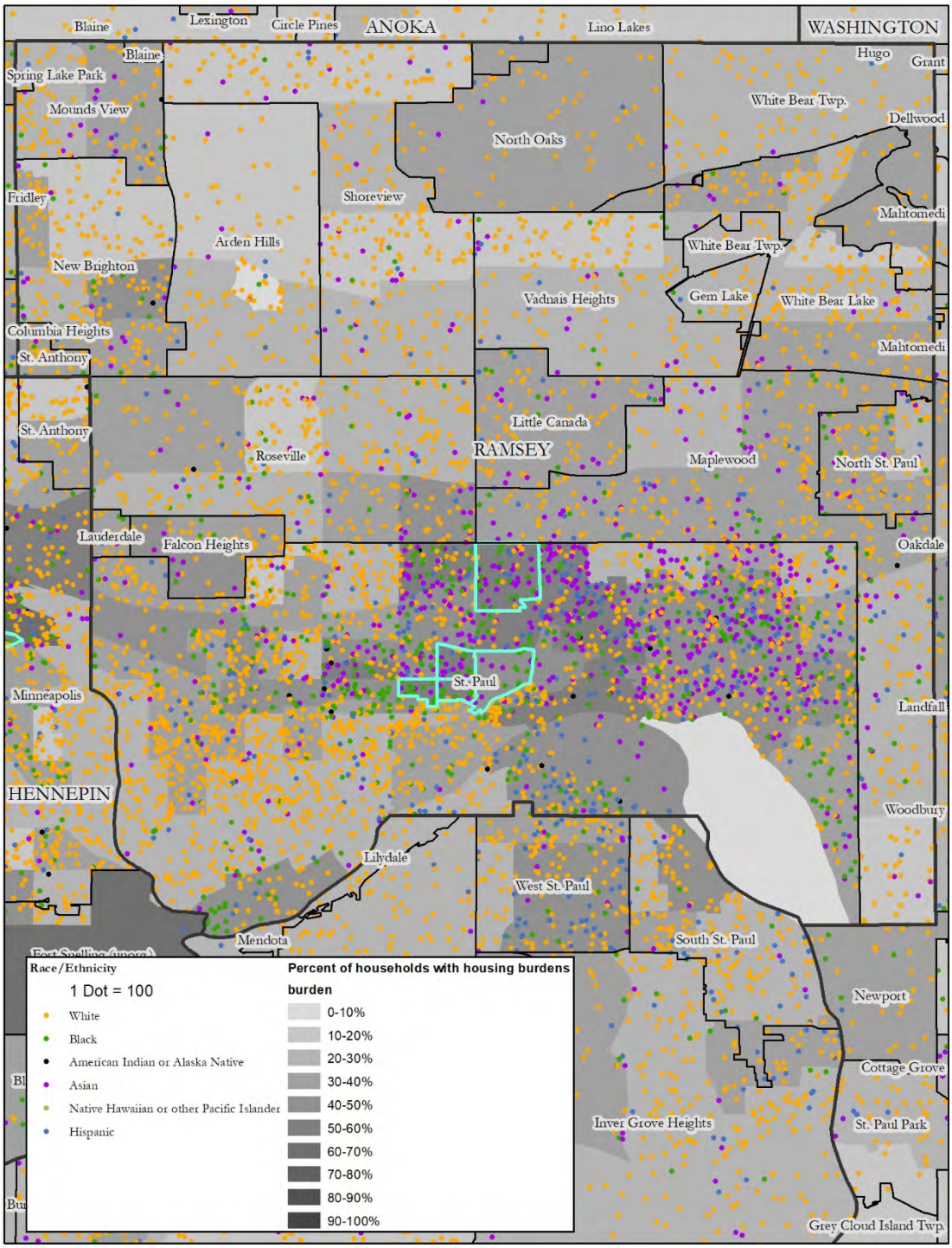
[23] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 18: Housing Problems in Plymouth, National Origin[24]



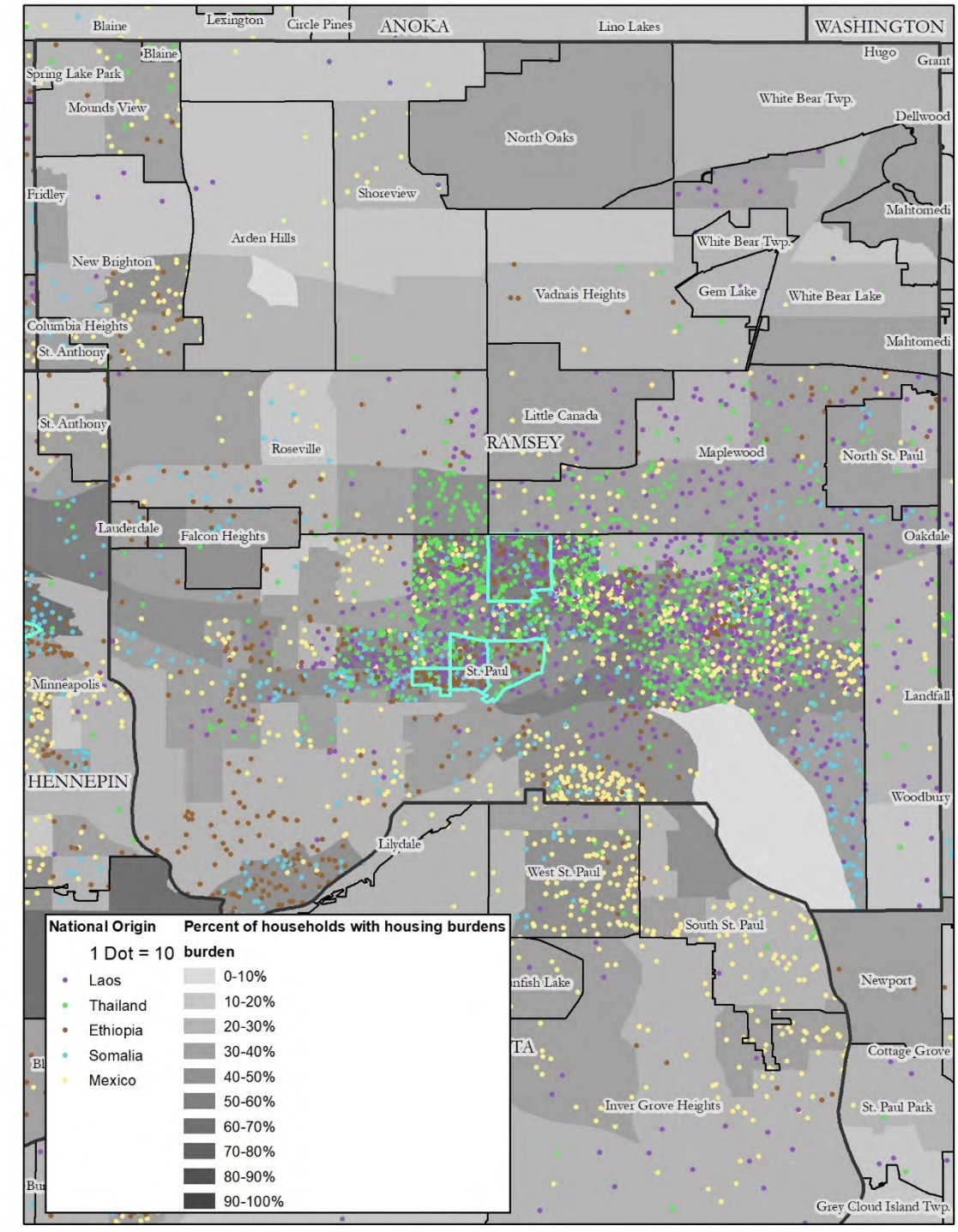
[24] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 19: Housing Problems in Ramsey County, Race[25]



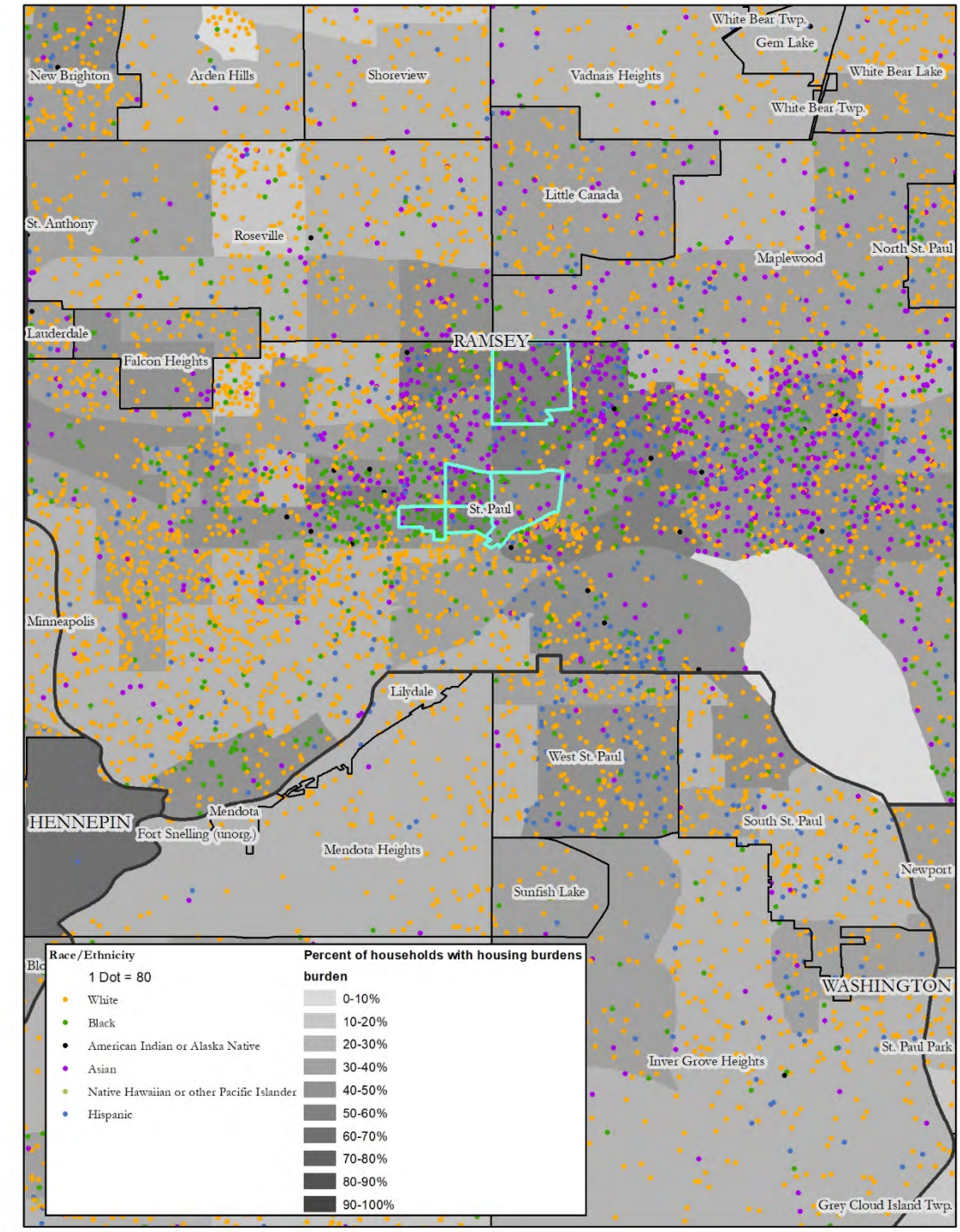
[25] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 20: Housing Problems in Ramsey County, National Origin[26]



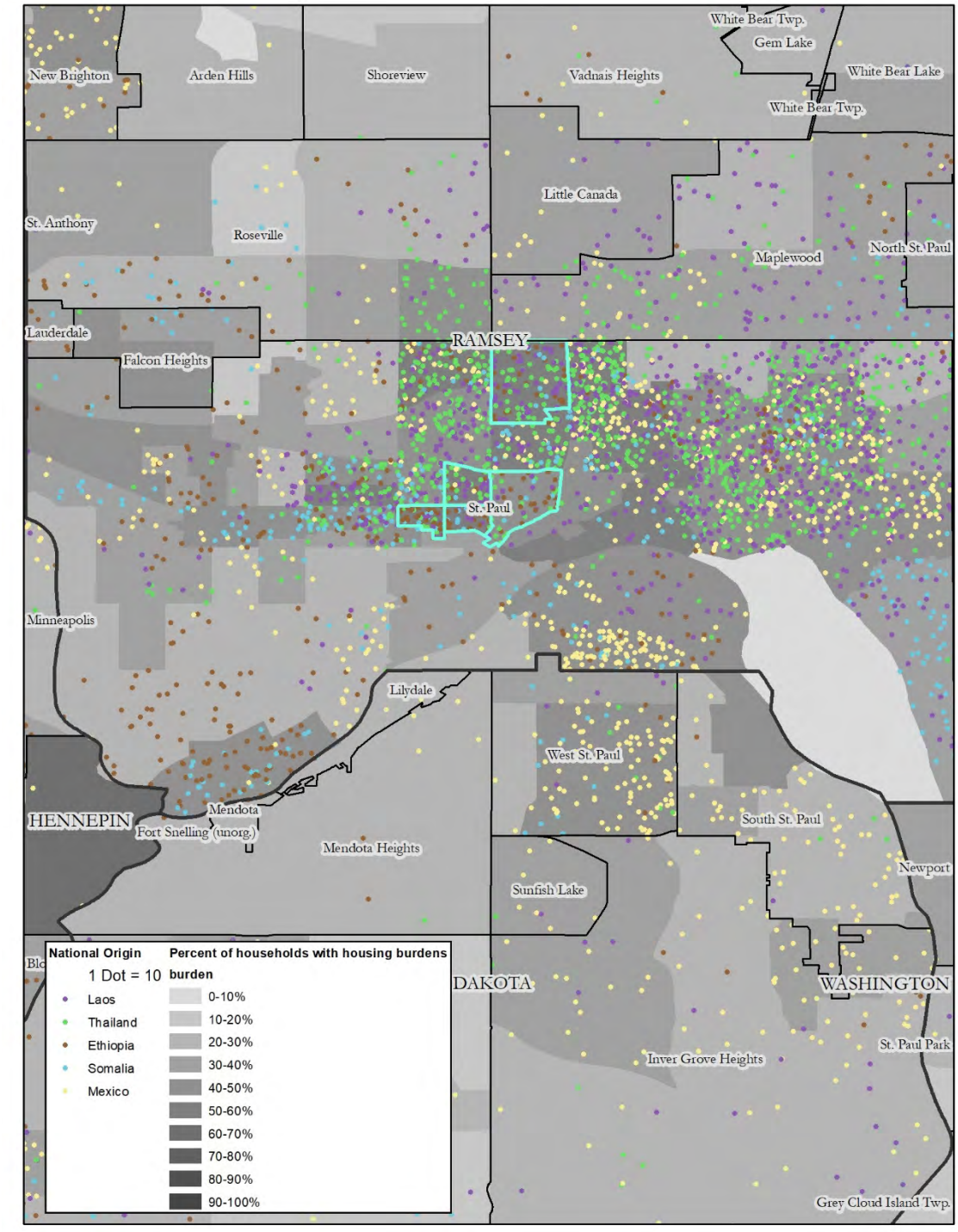
[26] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 21: Housing Problems in St. Paul, Race[27]



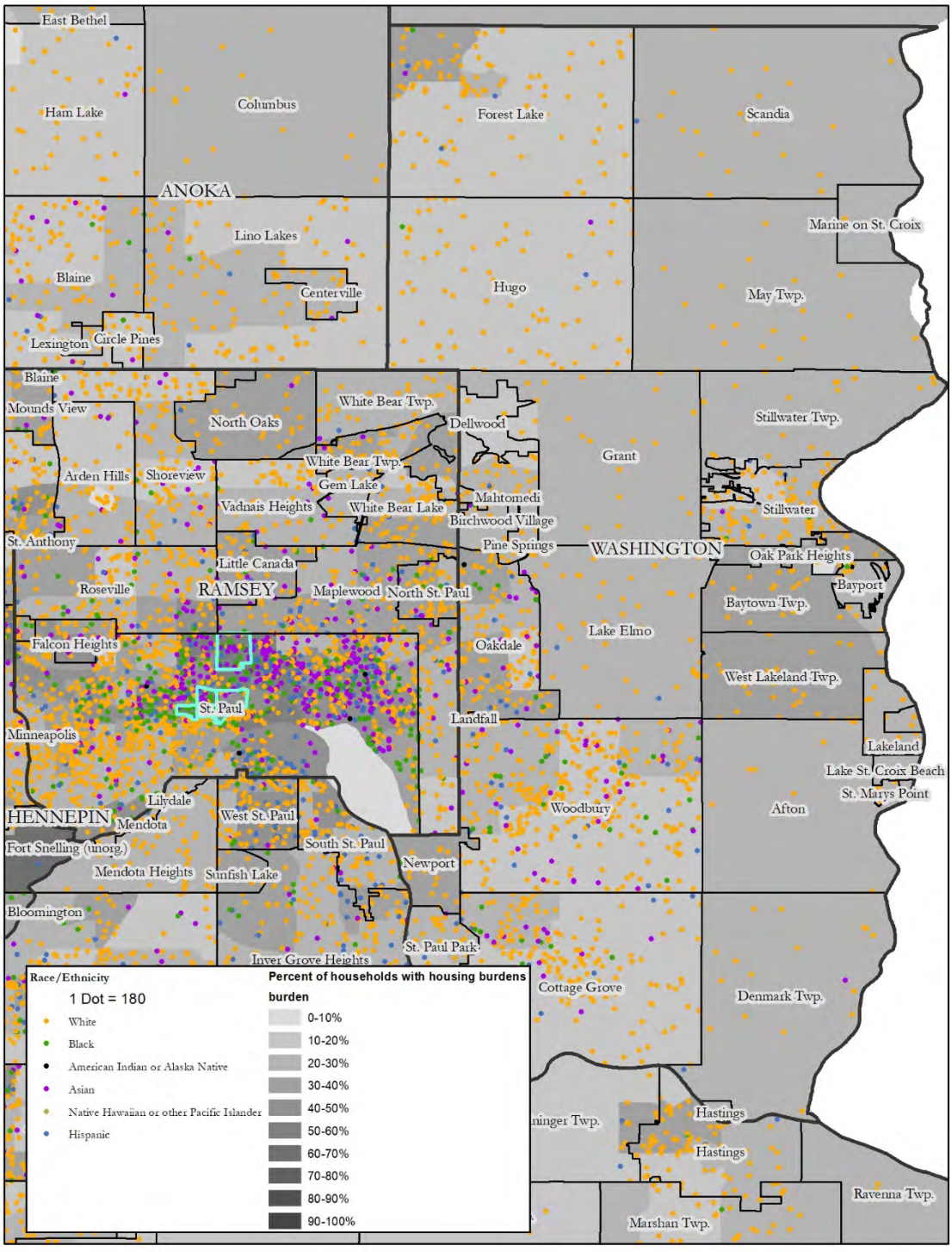
[27] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 22: Housing Problems in St. Paul, National Origin[28]



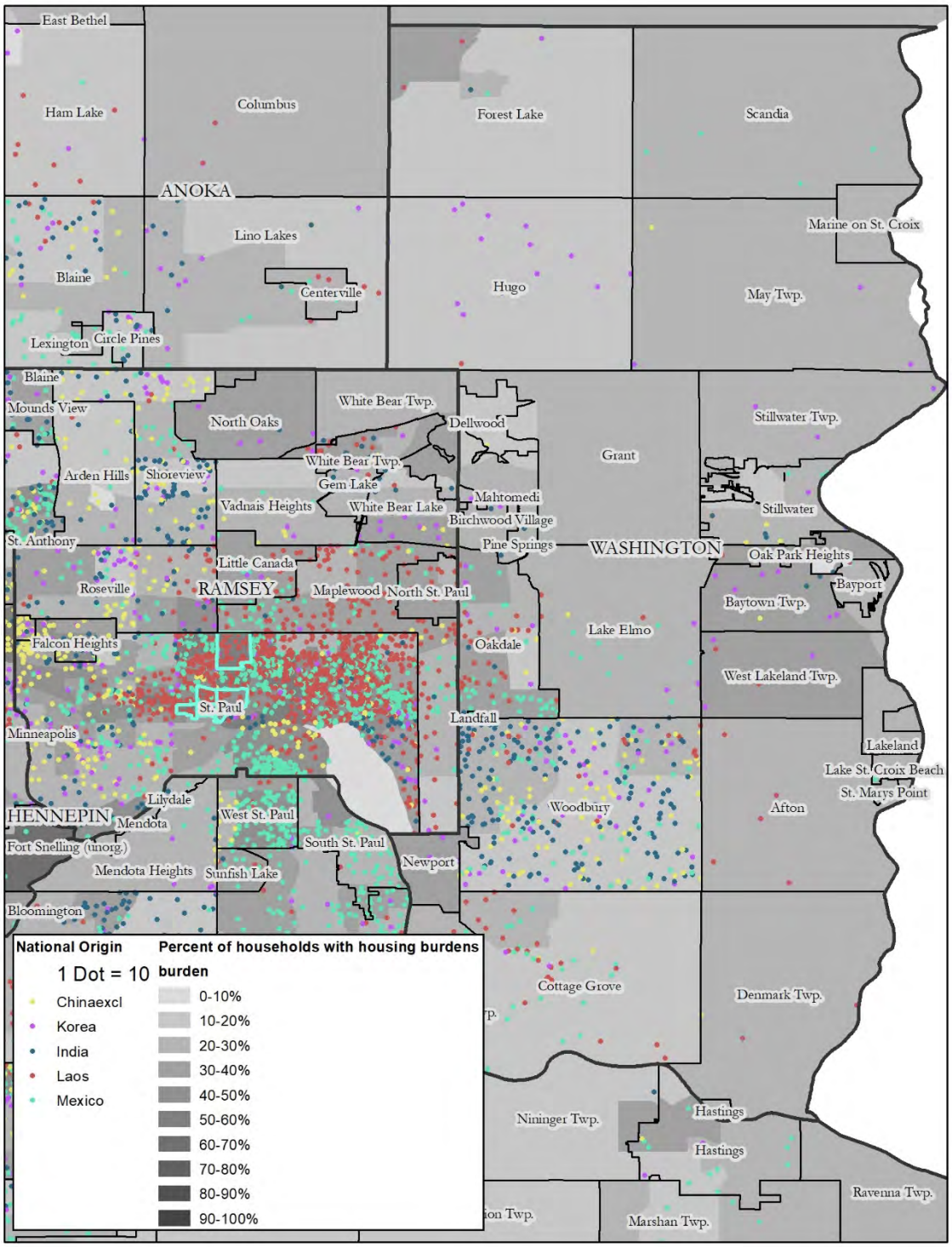
[28] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 23: Housing Problems in Washington County, Race[29]



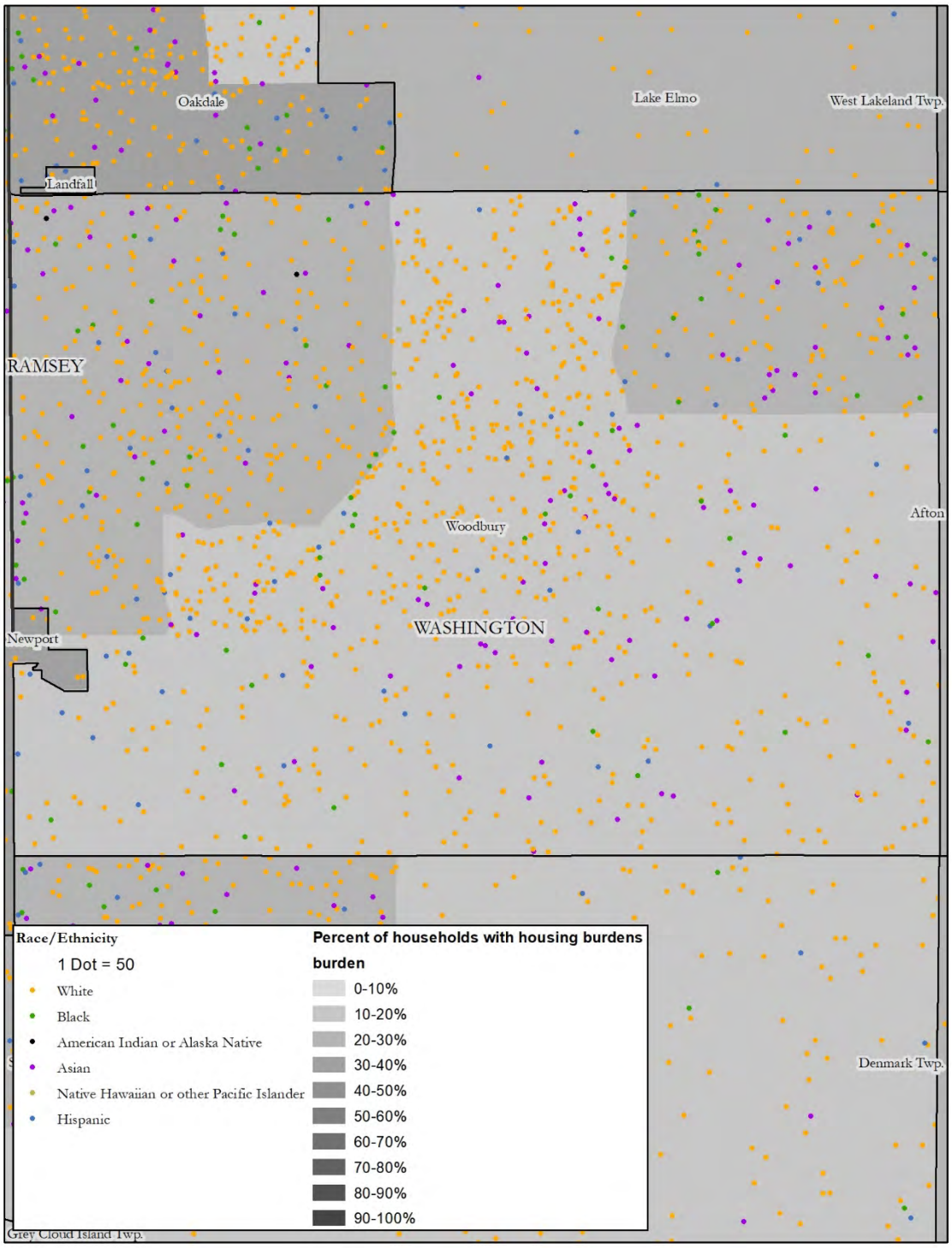
[29] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 24: Housing Problems in Washington County, National Origin[30]



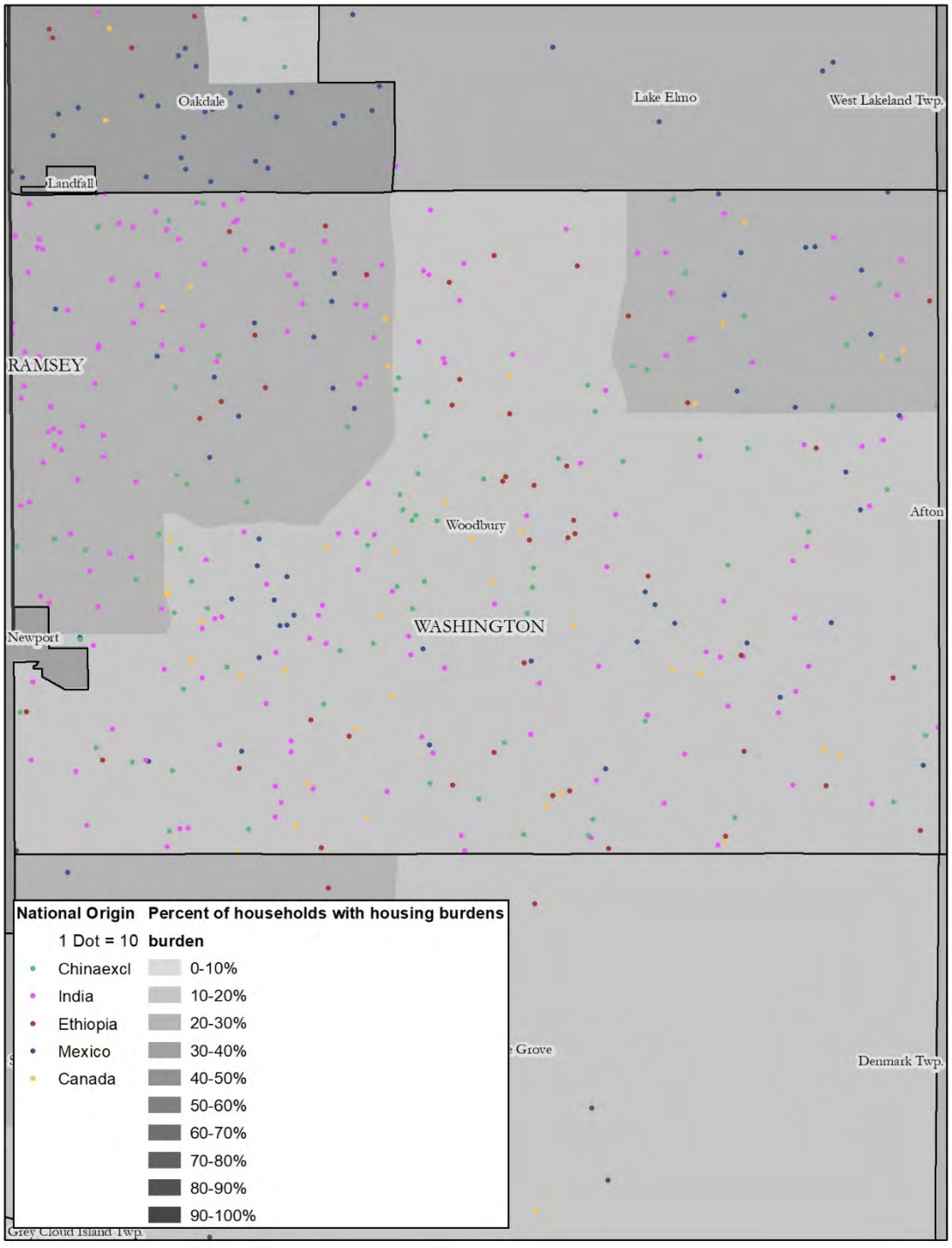
[30] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 25: Housing Problems in Woodbury, Race[31]



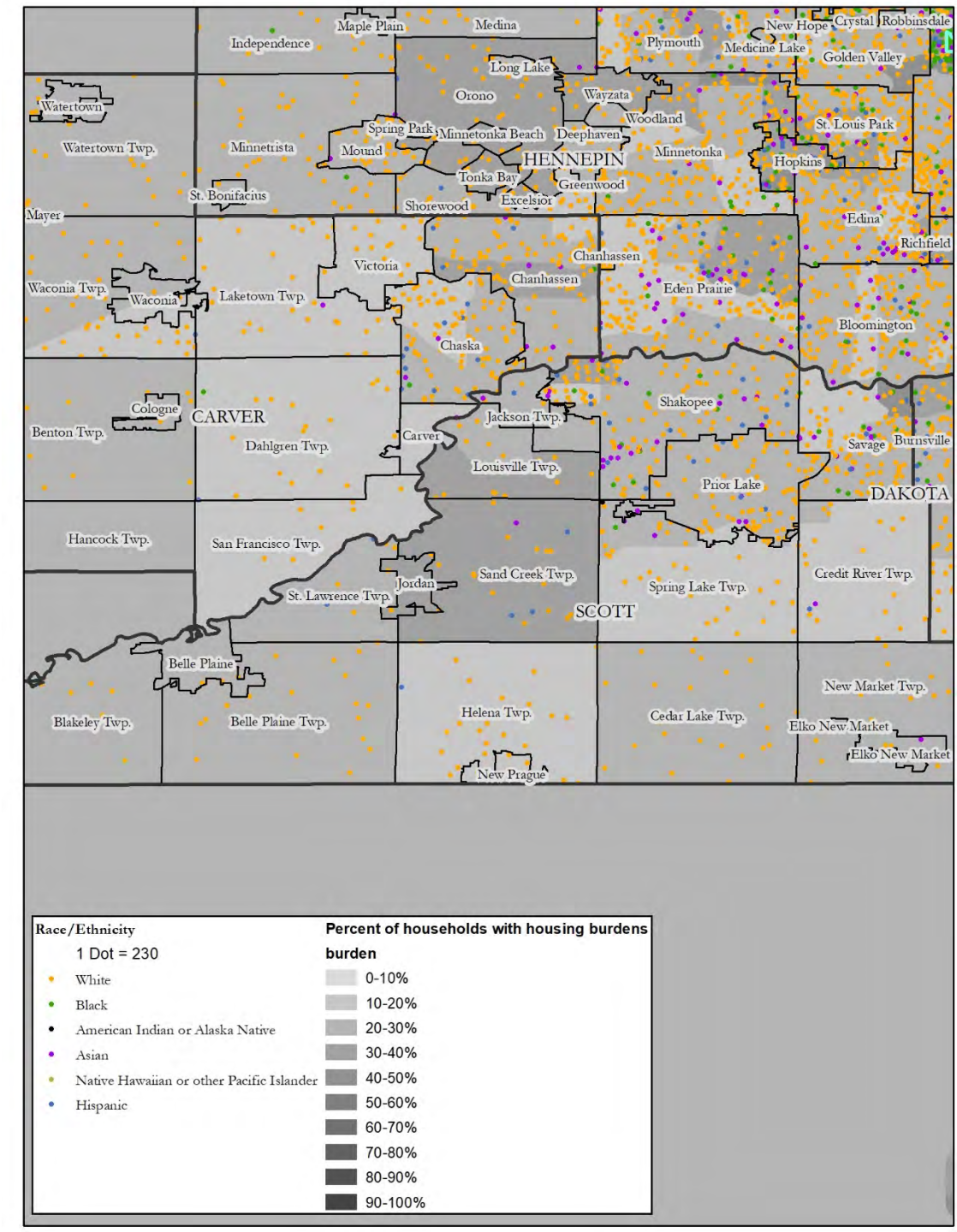
[31] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 26: Housing Problems in Woodbury, National Origin[32]



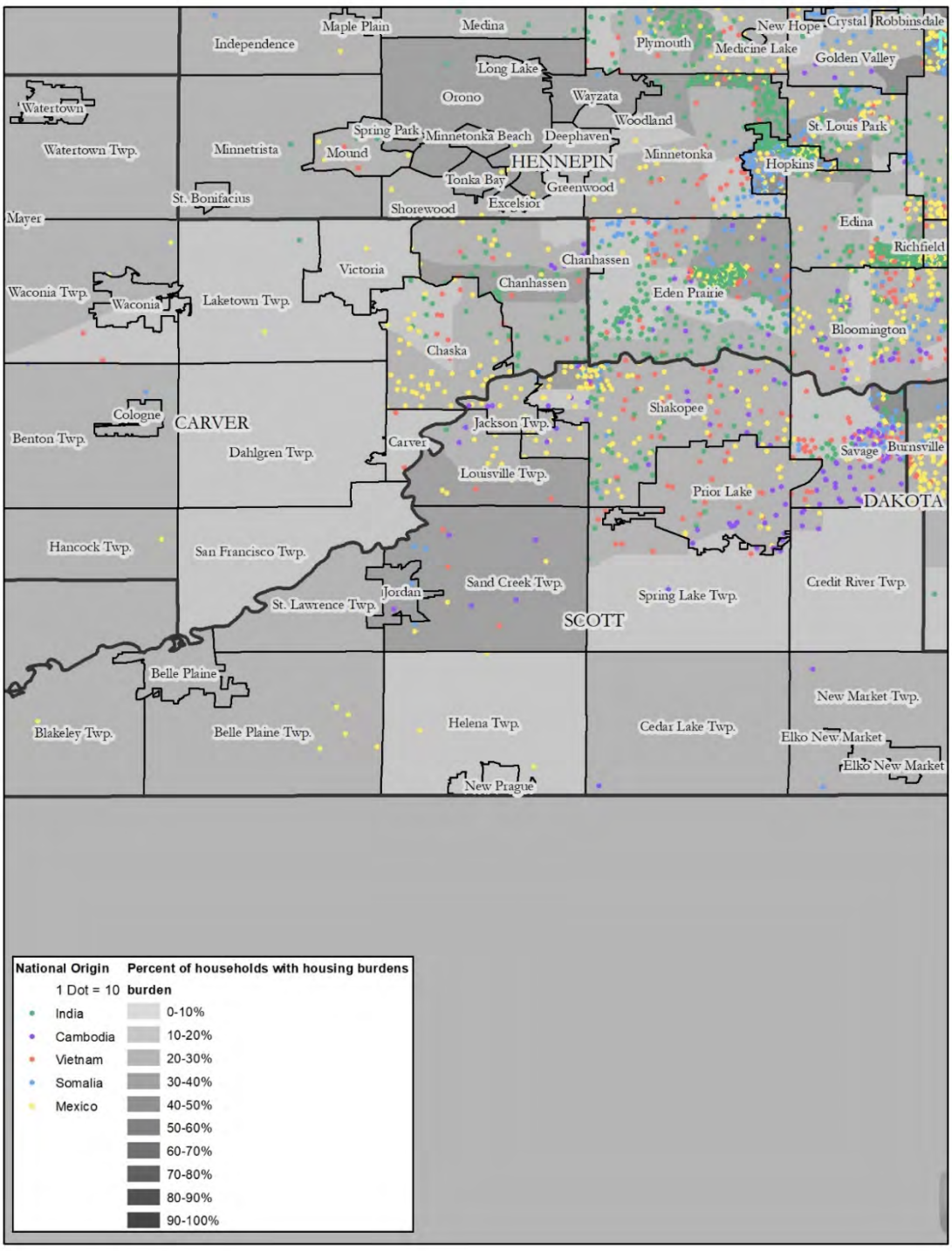
[32] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 27: Housing Problems in Scott County, Race[33]



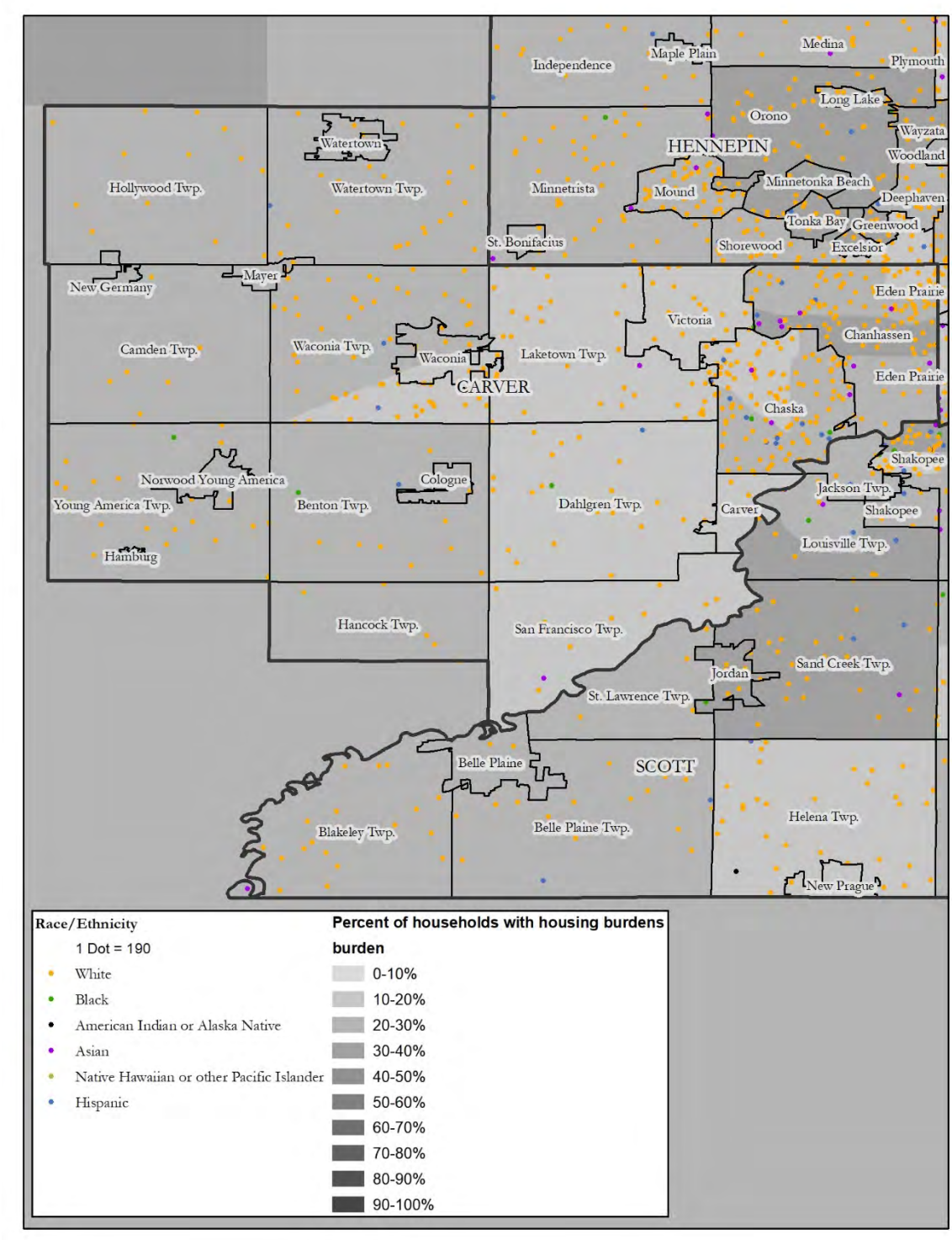
[33] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 28: Housing Problems in Scott County, National Origin[34]



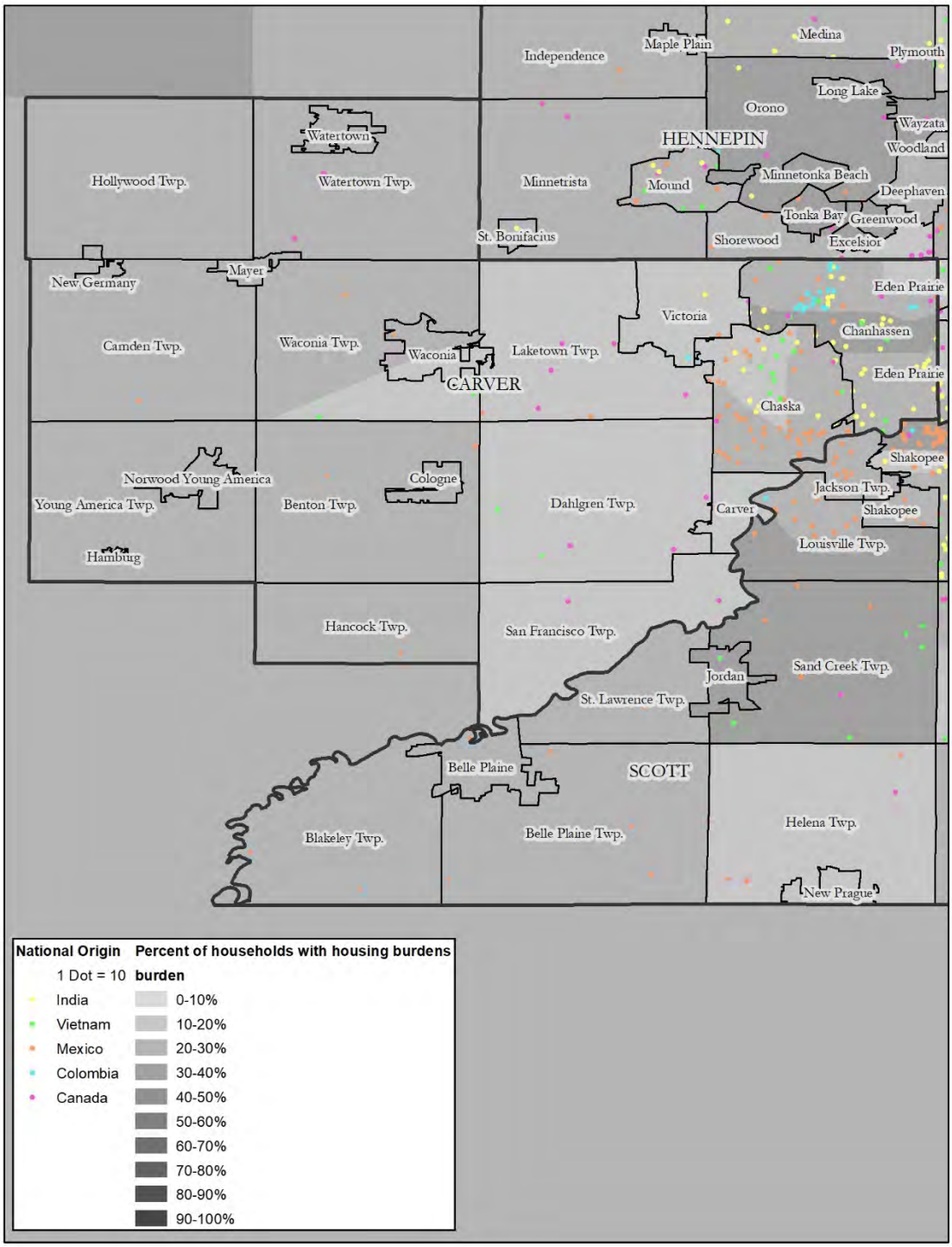
[34] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 29: Housing Problems in Carver County, Race[35]



[35] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Map 30: Housing Problems in Carver County, National Origin[36]



[36] *Sources: Comprehensive Housing Affordability Strategy (CHAS) Data, 2012-2016; American Community Survey Estimates 2013-2017.*

Anoka County
Anoka County experiences fairly uniform and low distributions of housing burdens across the County. Areas in Coon Rapids and Anoka are slightly more affected. These areas also have higher populations of Liberian, Mexican and Vietnamese residents.

Coon Rapids
Certain neighborhoods in the south of Coon Rapids are more likely to experience housing problems. These areas have slightly higher concentrations of Black, Asian and Hispanic residents than does the rest of the City.

Dakota County
Dakota County has uniform and low distributions of housing problems. Cities in the center of the County, including Rosemount, Empire and Vermillion experience lower rates of housing problems, but are also less populated. Black, Asian and Hispanic residents are concentrated more in the west of the County, which experiences more housing problems. So too does West St. Paul and South St. Paul. Mexican and Vietnamese residents in West and South St. Paul, Burnsville and Apple Valley are more likely to live in areas with higher rates of housing problems. So, too, are Ethiopian residents in Eagan and Apple Valley.

Hennepin County
Housing problems are more present in the eastern half of Hennepin County than the western half. Minneapolis is the most affected area in Hennepin County, and is also where most Black, Hispanic and Asian residents are located in the County. Southwest Brooklyn Park, Hopkins, and northeast Eden Prairie also have higher concentrations of housing problems. Indian residents in the stretch of area from Maple Grove through Plymouth and to Hopkins live in areas with slightly more housing problems, as do Liberian residents in Brooklyn Park.

Bloomington
The eastern half of Bloomington has more housing problems than the western half. A cluster of Black, Hispanic and Asian residents to the west of the Mall of America is likely to experience more housing problems. Ethiopian and Salvadoran residents are also more concentrated in this area. The western half of the City contains Hyland Lake Park Reserve, which likely contributes to the lower number of housing problems in the area as less people are settled there.

Eden Prairie
The northeast area of Eden Prairie, which is slightly more commercial, contains the highest rates of housing problems. Black, Asian and Hispanic residents are slightly more concentrated in this area, as are Indian, Mexican, Somalian and Ethiopian residents.

Minneapolis
Minneapolis has higher rates of housing problems than much of the region, especially in areas that qualify as R/ECAPs (these are not pictured in the maps above but are described in detail in the R/ECAPs section). Areas with more Black, Hispanic, Asian and Native American residents, primarily in the center and northwest of the city, have noticeably higher rates of housing problems. Ethiopian, Mexican, Ecuadoran and Somalian residents are also more concentrated in these areas.

Minnetonka
Most of the population of Minnetonka is evenly distributed, so no immediate spatial patterns of housing problems and race/ethnicity are apparent. The same is not true, however, for national origin. Indian residents in the very northeast of the City reside in areas with higher rates of housing problems. Clusters of Russian and Vietnamese residents in the center of the City have access to neighborhoods with slightly lower rates of housing problems.

Plymouth
Most of Plymouth has lower rates of housing problems, with the exception of a single neighborhood neighboring New Hope. This neighborhood, to the east of Clifton E. French Regional Park, has slightly more Black residents and more housing problems. Nigerian residents are also slightly concentrated in this area.

Ramsey County
Most of the areas with housing problems in Ramsey County are concentrated in St. Paul, with a few exceptions. Areas of North Oaks, New Brighton, and Mounds View have slightly higher rates of housing problems. Mexican and Thai residents tend to reside in those areas of Mounds View and New Brighton. These areas do not visibly or immediately correlate to racial/ethnic patterns, but the same is not true of St. Paul, which is discussed individually below.

St. Paul
These are clear patterns of Black, Asian and Hispanic residents primarily residing in areas of St. Paul that have higher rates of housing problems. This includes the R/ECAPs located in the very center of the City, which is also where there are higher concentrations of Thai, Laotian, and Ethiopian residents. Mexican residents similarly reside in eastern areas of the City which have higher numbers of housing problems.

Washington County
Most areas of Washington County have low rates of housing problems. Areas with higher rates of housing problems are found in Oak Park Heights, Baytown, and West Lakeland, but these areas do not have any immediately visible racial/ethnic patterns. Residents of Indian, Chinese, Korean, Laotian and Mexican national origin are generally found more in Woodbury and the areas of the county bordering Ramsey County, but these populations do not reside in areas with higher rates of housing problems.

Woodbury
Woodbury experiences generally low levels of housing problems. Residents are mostly evenly dispersed by race/ethnicity and by national origin.

Scott County
In Scott County, Sand Creek and Louisville tend to have the most visible patterns of housing problems. However, these areas do not have clear patterns of segregation based on race/ethnicity. The northwest corner of Shakopee has slightly higher rates of housing problems, as well as a higher concentration of Mexican residents.

Carver County

Households with housing problems are distributed fairly uniformly throughout Carver County. Central Chanhassen has slightly higher rates of housing problems, but there are no immediate patterns of disparities related to race or national origin in this area.

Region

Regionally, Hennepin County, Minneapolis, Ramsey County and St. Paul have the most visible patterns of housing problems. Other areas of the Region tend to have households with housing problems more evenly dispersed than in these areas. This does not, however, mean that racial/ethnic patterns of access to areas with lower housing problems are not present. The tables earlier in this section indicate that virtually all Counties and Cities included in this analysis have some disparities based on race/ethnicity. Housing problems remain an issue that affect especially Black and Hispanic households in the Region; the maps above (which indicate rate of housing problems by census tract) just cannot indicate that disparities in housing problems are based on immediate, visual patterns of segregation in much of the Region.

Some of the patterns discussed earlier, with respect to rates of housing problems, are visible in the maps as well. For the most part, most of the Region experiences little difference in rates of housing problems, indicating that racial disparities in rates of housing problems are based less on location and more on differences in individual tracts or neighborhoods. However, there are some areas of the Region where that is not the case. For example, Black residents are more densely populated along the eastern border of Hennepin County, which also experiences slightly higher rates of housing problems. The same is true of Coon Rapids, and especially of Minneapolis and St. Paul. In the two Cities, areas experiencing housing problems include the areas described in the R/ECAPs section, including northwest Minneapolis, central Minneapolis, and central St. Paul. These areas also have more Black, Hispanic and Asian or Pacific Islander residents. The maps also indicate some disparities based on national origin for these areas. In Minneapolis, residents of Ethiopian, Somalian, Mexican, Laotian and Ecuadoran origin are found more in areas that experience higher rates of housing problems. The same is true of residents of Laotian, Thai, Ethiopian, Somalian and Mexican residents in St. Paul.

Additional Information

3. *Beyond the HUD-provided data, provide additional relevant information, if any, about disproportionate housing needs in the jurisdiction and Region affecting groups with other protected characteristics.*

4. *The program participant may also describe other information relevant to its assessment of disproportionate housing needs. For PHAs, such information may include a PHA's overriding housing needs analysis.*

Homelessness

The Minnesota Homeless Study provides recent information regarding homelessness in Minnesota and the Twin Cities Region.[37] From 2015 to 2018, the Region experienced a 9% increase in homelessness, and composed much of the state's overall increase in its homeless population. Significant racial disparities exist among the homeless population. Two-thirds (66%) of homeless adults surveyed were people of color or indigenous while only 17% of the overall Minnesota population are people of color or indigenous.[38]

The study indicated that one of the reasons for this increase was the Region's increasing cost of housing, especially in comparison to the rest of the state. Community engagement stakeholders reported a significant shortage in available services for homeless residents in the Region. There is a particular shortage of shelter availability for homeless families with children where they would be able to reside together, rather than be separated. It was also reported several times that often the only available shelters for women to stay with their children are reserved for survivors of domestic violence, and that there was explicit encouragement from service providers and police officers to lie about being a survivor of domestic violence if women wanted access to these shelters.

Contributing Factors of Disproportionate Housing Needs

Please see the Appendix for the following Contributing Factors to Disproportionate Housing Needs:

- Availability of affordable units in a range of sizes
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Lack of access to opportunity due to high housing costs
- Lack of private investments in specific neighborhoods
- Lack of public investments in specific neighborhoods, including services or amenities
- Land use and zoning laws
- Lending discrimination
- Loss of affordable housing
- Source of income discrimination

[37] http://mnhomeless.org/minnesota-homeless-study/reports-and-fact-sheets/2018/2018-homelessness-in-minnesota-3-20.pdf
[38] Ibid, 6.

C. Publicly Supported Housing Analysis

1. Analysis[39]

a. Publicly Supported Housing Demographics

The Publicly Supported Housing section analyzes federally funded affordable housing and other types of affordable housing, to determine whether the level of need is being met and whether patterns of affordable housing siting concentrate minorities in low opportunity areas, among other things. In the Twin Cities region, each category of publicly supported housing (public housing, Project-Based Section 8, Other Multifamily Housing,[40] Housing Choice Vouchers, and LIHTC units) is represented, although that representation varies greatly depending on the individual jurisdiction. Affordable housing, except for LIHTC, makes up less than 4% or less of the total housing stock in all of the entitlement jurisdictions in this analysis (Anoka County, Bloomington, Dakota County, Eden Prairie, Hennepin County, Minneapolis, Minnetonka, Plymouth, Ramsey County, St. Paul, Washington County, and Woodbury City). In each of these jurisdictions, LIHTC, Housing Choice Voucher and Project-based Section 8 units tend to predominate, and some jurisdictions have no Public Housing at all. Overall, it is clear that the amount of publicly supported housing available in the Twin Cities region does not rise to meet the level of need, although progress is being made.

Table 1: Publicly Supported Housing Units by Program Category, Anoka County

Housing Units	#	%
Total housing units	126,758	-
Public Housing	N/a	N/a
Project-based Section 8	1,005	0.79%
Other Multifamily	150	0.12%
HCV Program	1,497	1.18%
LIHTC	1,323	1.04%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

[39] Data in this section is largely taken from the HUD AFFH-T documentation tool, which only shows federally supported public housing built through 2016. For a more comprehensive list of public housing units, please see the Publicly Supported Housing Appendix, which includes data taken from HousingLink.org.

[40] Category includes Section 202 –Supportive Housing for the Elderly and Section 811 – Supportive Housing for Persons with Disabilities.

Table 2: Publicly Supported Housing Units by Program Category, Bloomington

Housing Units	#	%
Total housing units	37,641	-
Public Housing	N/a	N/a
Project-based Section 8	534	1.42%
Other Multifamily	169	0.45%
HCV Program	558	1.48%
LIHTC	264	0.70%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 3: Publicly Supported Housing Units by Program Category, Dakota County

Housing Units	#	%
Total housing units	165,907	-
Public Housing	621	0.37%
Project-based Section 8	1,120	0.68%
Other Multifamily	187	0.11%
HCV Program	2,660	1.60%
LIHTC	2,252	1.36%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 4: Publicly Supported Housing Units by Program Category, Eden Prairie

Housing Units	#	%
Total housing units	25,075	-
Public Housing	N/a	N/a
Project-based Section 8	353	1.41%
Other Multifamily	N/a	N/a
HCV Program	267	1.06%
LIHTC	364	1.45%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 5: Publicly Supported Housing Units by Program Category, Hennepin County

Housing Units	#	%
Total housing units	217,315	-
Public Housing	285	0.13%
Project-based Section 8	2,492	1.15%
Other Multifamily	232	0.11%
HCV Program	3,179	1.46%
LIHTC	3,475	1.60%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 6: Publicly Supported Housing Units by Program Category, Minneapolis

Housing Units	#	%
Total housing units	178,287	-
Public Housing	6,259	3.51%
Project-based Section 8	4,548	2.55%
Other Multifamily	292	0.16%
HCV Program	5,289	2.97%
LIHTC	13,430	7.53%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 7: Publicly Supported Housing Units by Program Category, Minnetonka

Housing Units	#	%
Total housing units	23,294	-
Public Housing	N/a	N/a
Project-based Section 8	242	1.04%
Other Multifamily	68	0.29%
HCV Program	160	0.69%
LIHTC	158	0.69%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 8: Publicly Supported Housing Units by Program Category, Plymouth

Housing Units	#	%
Total housing units	29,973	-
Public Housing	112	0.37%
Project-based Section 8	105	0.35%
Other Multifamily	45	0.15%
HCV Program	239	0.80%
LIHTC	285	0.95%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 9: Publicly Supported Housing Units by Program Category, Ramsey County

Housing Units	#	%
Total housing units	96,626	-
Public Housing	N/a	N/a
Project-based Section 8	1,239	1.28%
Other Multifamily	193	0.20%
HCV Program	1,497	1.55%
LIHTC	8,219	8.51%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 10: Publicly Supported Housing Units by Program Category, St. Paul

Housing Units	#	%
Total housing units	120,795	-
Public Housing	4,256	3.52%
Project-based Section 8	3,073	2.54%
Other Multifamily	333	0.28%
HCV Program	4,608	3.81%
LIHTC	4,607	3.81%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 11: Publicly Supported Housing Units by Program Category, Washington County

Housing Units	#	%
Total housing units	68,048	
Public Housing	960	1.41%
Project-based Section 8	74	0.11%
Other Multifamily	68	0.10%
HCV Program	178	0.89%
LIHTC	2,575	3.78%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 12: Publicly Supported Housing Units by Program Category, Woodbury City

Housing Units	#	%
Total housing units	23,568	-
Public Housing	65	0.28%
Project-based Section 8	N/a	N/a
Other Multifamily	N/a	N/a
HCV Program	24	0.10%
LIHTC	161	0.68%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

LIHTC

According to Minnesota Housing, there are 483 Low Income Housing Tax Credit (LIHTC) developments in the Twin Cities region, some of which are designated for specific populations. These developments include 37,113 low-income units, including 18,697 reserved for At-Risk populations, such as large families, the elderly, people with disabilities, and formerly homeless individuals.

i. *Are certain racial/ethnic groups more likely to be residing in one program category of publicly supported housing than other program categories (public housing, project-based Section 8, Other Multifamily Assisted developments, and Housing Choice Voucher (HCV) in the jurisdiction?*

Please note: rows for which all values are zero or n/a have been deleted for space.

Table 14: Publicly Supported Housing Demographics, Anoka County

Anoka County	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
Project-Based Section 8	786	83.88%	126	13.45%	12	1.28%	5	0.53%
Other Multifamily	133	92.36%	3	2.08%	3	2.08%	4	2.78%
HCV Program	754	50.77%	681	45.86%	14	0.94%	16	1.08%
Total Households	110,563	90.06%	4,014	3.27%	2,782	2.27%	3,532	2.88%
0-30% of AMIw	9,988	83.99%	978	8.22%	439	3.69%	209	1.76%
0-50% of AMI	16,476	67.10%	1,682	6.85%	1,130	4.60%	784	3.19%
0-80% of AMI	33,967	76.71%	2,493	5.63%	1,741	3.93%	1,157	2.61%
MSP Region	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	2,799	25.09%	6,246	55.98%	320	2.87%	1,669	14.96%
Project-Based Section 8	6,971	47.57%	6,394	43.63%	382	2.61%	586	4.00%
Other Multifamily	1,195	73.58%	228	14.04%	20	1.23%	135	8.31%
HCV Program	6,800	32.44%	12,925	61.67%	460	2.19%	471	2.25%
Total Households	1,107,382	84.24%	83,378	6.34%	45,365	3.45%	54,194	4.12%
0-30% of AMI	106,015	65.41%	30,656	18.91%	10,284	6.34%	9,033	5.57%
0-50% of AMI	179,095	57.82%	47,081	15.20%	20,259	6.54%	16,139	5.21%
0-80% of AMI	347,205	67.76%	60,470	11.80%	29,221	5.70%	24,262	4.73%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 15: Publicly Supported Housing Demographics, Bloomington

Bloomington	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
Project-Based Section 8	341	69.88%	74	15.16%	3	0.61%	68	13.93%
Other Multifamily	133	80.12%	16	9.64%	0	0.00%	17	10.24%
HCV Program	181	36.64%	297	60.12%	6	1.21%	6	1.21%
Total Households	30,130	83.21%	2,470	6.82%	1,615	4.46%	1,379	3.81%
0-30% of AMI	2,820	69.63%	870	21.48%	175	4.32%	109	2.69%
0-50% of AMI	5,035	60.44%	1,325	15.91%	520	6.24%	274	3.29%
0-80% of AMI	10,400	68.94%	1,695	11.24%	1,110	7.36%	529	3.51%
MSP Region	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	2,799	25.09%	6,246	55.98%	320	2.87%	1,669	14.96%
Project-Based Section 8	6,971	47.57%	6,394	43.63%	382	2.61%	586	4.00%
Other Multifamily	1,195	73.58%	228	14.04%	20	1.23%	135	8.31%
HCV Program	6,800	32.44%	12,925	61.67%	460	2.19%	471	2.25%
Total Households	1,107,382	84.24%	83,378	6.34%	45,365	3.45%	54,194	4.12%
0-30% of AMI	106,015	65.41%	30,656	18.91%	10,284	6.34%	9,033	5.57%
0-50% of AMI	179,095	57.82%	47,081	15.20%	20,259	6.54%	16,139	5.21%
0-80% of AMI	347,205	67.76%	60,470	11.80%	29,221	5.70%	24,262	4.73%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 16: Publicly Supported Housing Demographics, Dakota County

Dakota County	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#r	%	#	%
Public Housing	392	65.66%	147	24.62%	34	5.70%	21	3.52%
Project-Based Section 8	670	63.63%	321	30.48%	45	4.27%	12	1.14%
Other Multifamily	158	88.76%	14	7.87%	4	2.25%	2	1.12%
HCV Program	1,287	52.00%	1,033	41.74%	108	4.36%	33	1.33%
Total Households	139,669	87.24%	6,160	3.85%	6,841	4.27%	5,371	3.35%
0-30% of AMI	11,132	72.49%	1,484	9.66%	1,732	11.28%	623	4.06%
0-50% of AMI	19,519	62.17%	2,478	7.89%	2,875	9.16%	1,240	3.95%
0-80% of AMI	39,195	71.43%	3,580	6.52%	4,337	7.90%	1,957	3.57%
MSP Region	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	2,799	25.09%	6,246	55.98%	320	2.87%	1,669	14.96%
Project-Based Section 8	6,971	47.57%	6,394	43.63%	382	2.61%	586	4.00%
Other Multifamily	1,195	73.58%	228	14.04%	20	1.23%	135	8.31%
HCV Program	6,800	32.44%	12,925	61.67%	460	2.19%	471	2.25%
Total Households	1,107,382	84.24%	83,378	6.34%	45,365	3.45%	54,194	4.12%
0-30% of AMI	106,015	65.41%	30,656	18.91%	10,284	6.34%	9,033	5.57%
0-50% of AMI	179,095	57.82%	47,081	15.20%	20,259	6.54%	16,139	5.21%
0-80% of AMI	347,205	67.76%	60,470	11.80%	29,221	5.70%	24,262	4.73%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 17: Publicly Supported Housing Demographics, Eden Prairie

Eden Prairie	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
Project-Based Section 8	99	29.64%	214	64.07%	1	0.30%	20	5.99%
Other Multifamily	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
HCV Program	57	21.19%	207	76.95%	2	0.74%	1	0.37%
Total Households	20,215	83.95%	999	4.15%	565	2.35%	1,924	7.99%
0-30% of AMI	1,195	76.36%	265	16.93%	60	3.83%	20	1.28%
0-50% of AMI	1,970	59.16%	505	15.17%	145	4.35%	50	1.50%
0-80% of AMI	3,920	68.41%	584	10.19%	270	4.71%	215	3.75%
MSP Region	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	2,799	25.09%	6,246	55.98%	320	2.87%	1,669	14.96%
Project-Based Section 8	6,971	47.57%	6,394	43.63%	382	2.61%	586	4.00%
Other Multifamily	1,195	73.58%	228	14.04%	20	1.23%	135	8.31%
HCV Program	6,800	32.44%	12,925	61.67%	460	2.19%	471	2.25%
Total Households	1,107,382	84.24%	83,378	6.34%	45,365	3.45%	54,194	4.12%
0-30% of AMI	106,015	65.41%	30,656	18.91%	10,284	6.34%	9,033	5.57%
0-50% of AMI	179,095	57.82%	47,081	15.20%	20,259	6.54%	16,139	5.21%
0-80% of AMI	347,205	67.76%	60,470	11.80%	29,221	5.70%	24,262	4.73%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 18: Publicly Supported Housing Demographics, Hennepin County

Hennepin County	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	158	59.62%	95	35.85%	5	1.89%	6	2.26%
Project-Based Section 8	1,468	62.55%	766	32.64%	30	1.28%	72	3.07%
Other Multifamily	173	82.38%	28	13.33%	2	0.95%	7	3.33%
HCV Program	816	26.21%	2,191	70.38%	31	1.00%	45	1.45%
Total Households	168,185	81.54%	17,818	8.64%	6,871	3.33%	9,733	4.72%
0-30% of AMI	14,496	66.09%	4,452	20.30%	1,381	6.30%	765	3.49%
0-50% of AMI	25,236	54.75%	8,442	18.32%	3,077	6.68%	2,019	4.38%
0-80% of AMI	49,538	64.18%	12,057	15.62%	4,320	5.60%	3,427	4.44%
MSP Region	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	2,799	25.09%	6,246	55.98%	320	2.87%	1,669	14.96%
Project-Based Section 8	6,971	47.57%	6,394	43.63%	382	2.61%	586	4.00%
Other Multifamily	1,195	73.58%	228	14.04%	20	1.23%	135	8.31%
HCV Program	6,800	32.44%	12,925	61.67%	460	2.19%	471	2.25%
Total Households	1,107,382	84.24%	83,378	6.34%	45,365	3.45%	54,194	4.12%
0-30% of AMI	106,015	65.41%	30,656	18.91%	10,284	6.34%	9,033	5.57%
0-50% of AMI	179,095	57.82%	47,081	15.20%	20,259	6.54%	16,139	5.21%
0-80% of AMI	347,205	67.76%	60,470	11.80%	29,221	5.70%	24,262	4.73%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 19: Publicly Supported Housing Demographics, Minneapolis

Minneapolis	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	991	16.70%	4,397	74.10%	115	1.94%	345	5.81%
Project-Based Section 8	1,074	25.63%	2,608	62.24%	74	1.77%	180	4.30%
Other Multifamily	149	56.87%	81	30.92%	4	1.53%	5	1.91%
HCV Program	739	15.12%	3,897	79.73%	80	1.64%	49	1.00%
Total Households	116,490	70.41%	25,465	15.39%	9,775	5.91%	7,543	4.56%
0-30% of AMI	16,700	44.75%	12,915	34.61%	2,840	7.61%	2,584	6.92%
0-50% of AMI	25,830	43.48%	17,285	29.09%	5,435	9.15%	3,664	6.17%
0-80% of AMI	44,195	52.18%	20,835	24.60%	7,045	8.32%	4,599	5.43%
MSP Region	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	2,799	25.09%	6,246	55.98%	320	2.87%	1,669	14.96%
Project-Based Section 8	6,971	47.57%	6,394	43.63%	382	2.61%	586	4.00%
Other Multifamily	1,195	73.58%	228	14.04%	20	1.23%	135	8.31%
HCV Program	6,800	32.44%	12,925	61.67%	460	2.19%	471	2.25%
Total Households	1,107,382	84.24%	83,378	6.34%	45,365	3.45%	54,194	4.12%
0-30% of AMI	106,015	65.41%	30,656	18.91%	10,284	6.34%	9,033	5.57%
0-50% of AMI	179,095	57.82%	47,081	15.20%	20,259	6.54%	16,139	5.21%
0-80% of AMI	347,205	67.76%	60,470	11.80%	29,221	5.70%	24,262	4.73%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 20: Publicly Supported Housing Demographics, Minnetonka

Minnetonka	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
Project-Based Section 8	175	79.19%	40	18.10%	0	0.00%	4	1.81%
Other Multifamily	63	100.00%	0	0.00%	0	0.00%	0	0.00%
HCV Program	61	39.35%	93	60.00%	0	0.00%	1	0.65%
Total Households	20,150	91.45%	759	3.44%	325	1.47%	565	2.56%
0-30% of AMI	1,325	84.39%	144	9.17%	50	3.18%	35	2.23%
0-50% of AMI	2,515	66.98%	419	11.16%	65	1.73%	55	1.46%
0-80% of AMI	5,140	78.41%	444	6.77%	100	1.53%	130	1.98%
MSP Region	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	2,799	25.09%	6,246	55.98%	320	2.87%	1,669	14.96%
Project-Based Section 8	6,971	47.57%	6,394	43.63%	382	2.61%	586	4.00%
Other Multifamily	1,195	73.58%	228	14.04%	20	1.23%	135	8.31%
HCV Program	6,800	32.44%	12,925	61.67%	460	2.19%	471	2.25%
Total Households	1,107,382	84.24%	83,378	6.34%	45,365	3.45%	54,194	4.12%
0-30% of AMI	106,015	65.41%	30,656	18.91%	10,284	6.34%	9,033	5.57%
0-50% of AMI	179,095	57.82%	47,081	15.20%	20,259	6.54%	16,139	5.21%
0-80% of AMI	347,205	67.76%	60,470	11.80%	29,221	5.70%	24,262	4.73%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 21: Publicly Supported Housing Demographics, Plymouth[41]

Plymouth	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	51	50.50%	43	42.57%	2	1.98%	4	3.96%
Project-Based Section 8	39	90.70%	3	6.98%	0	0.00%	1	2.33%
Other Multifamily	188	53.11%	162	45.76%	3	0.85%	0	0.00%
HCV Program	25,320	86.79%	1,155	3.96%	665	2.28%	1,725	5.91%
Total Households	1,765	77.24%	285	12.47%	65	2.84%	120	5.25%
0-30% of AMI	3,165	67.99%	530	11.39%	105	2.26%	155	3.33%
0-50% of AMI	6,365	76.36%	735	8.82%	240	2.88%	270	3.24%
0-80% of AMI	49,538	64.18%	12,057	15.62%	4,320	5.60%	3,427	4.44%
MSP Region	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	2,799	25.09%	6,246	55.98%	320	2.87%	1,669	14.96%
Project-Based Section 8	6,971	47.57%	6,394	43.63%	382	2.61%	586	4.00%
Other Multifamily	1,195	73.58%	228	14.04%	20	1.23%	135	8.31%
HCV Program	6,800	32.44%	12,925	61.67%	460	2.19%	471	2.25%
Total Households	1,107,382	84.24%	83,378	6.34%	45,365	3.45%	54,194	4.12%
0-30% of AMI	106,015	65.41%	30,656	18.91%	10,284	6.34%	9,033	5.57%
0-50% of AMI	179,095	57.82%	47,081	15.20%	20,259	6.54%	16,139	5.21%
0-80% of AMI	347,205	67.76%	60,470	11.80%	29,221	5.70%	24,262	4.73%

Table 22: Publicly Supported Housing Demographics, Ramsey County

[41] The Plymouth HRA owns & operates 2 senior buildings which were not included in these tables. Plymouth Towne Square (https://bit.ly/2YG4hyu) has 99 units where rent is based on 37% of monthly income; Vicksburg Crossing (https://bit.ly/35H2MSs) has 96 units with 33 set aside for those at 50% of AMI.

Ramsey County	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	51	50.50%	43	42.57%	2	1.98%	4	3.96%
Project-Based Section 8	39	90.70%	3	6.98%	0	0.00%	1	2.33%
Other Multifamily	188	53.11%	162	45.76%	3	0.85%	0	0.00%
HCV Program	25,320	86.79%	1,155	3.96%	665	2.28%	1,725	5.91%
Total Households	1,765	77.24%	285	12.47%	65	2.84%	120	5.25%
0-30% of AMI	3,165	67.99%	530	11.39%	105	2.26%	155	3.33%
0-50% of AMI	6,365	76.36%	735	8.82%	240	2.88%	270	3.24%
0-80% of AMI	49,538	64.18%	12,057	15.62%	4,320	5.60%	3,427	4.44%

MSP Region	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	2,799	25.09%	6,246	55.98%	320	2.87%	1,669	14.96%
Project-Based Section 8	6,971	47.57%	6,394	43.63%	382	2.61%	586	4.00%
Other Multifamily	1,195	73.58%	228	14.04%	20	1.23%	135	8.31%
HCV Program	6,800	32.44%	12,925	61.67%	460	2.19%	471	2.25%
Total Households	1,107,382	84.24%	83,378	6.34%	45,365	3.45%	54,194	4.12%
0-30% of AMI	106,015	65.41%	30,656	18.91%	10,284	6.34%	9,033	5.57%
0-50% of AMI	179,095	57.82%	47,081	15.20%	20,259	6.54%	16,139	5.21%
0-80% of AMI	347,205	67.76%	60,470	11.80%	29,221	5.70%	24,262	4.73%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 23: Publicly Supported Housing Demographics, St. Paul

St. Paul	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	1,170	28.15%	1,498	36.04%	165	3.97%	1,292	31.09%
Project-Based Section 8	767	26.72%	1,750	60.98%	161	5.61%	165	5.75%
Other Multifamily	125	39.56%	70	22.15%	3	0.95%	96	30.38%
HCV Program	1,061	25.36%	2,637	63.04%	168	4.02%	242	5.79%
Total Households	75,220	67.22%	15,960	14.26%	7,395	6.61%	10,133	9.06%
0-30% of AMI	11,105	44.18%	7,170	28.53%	2,105	8.37%	3,579	14.24%
0-50% of AMI	18,165	42.86%	10,655	25.14%	3,930	9.27%	5,673	13.38%
0-80% of AMI	31,065	50.76%	12,980	21.21%	5,175	8.46%	7,488	12.24%
MSP Region	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	2,799	25.09%	6,246	55.98%	320	2.87%	1,669	14.96%
Project-Based Section 8	6,971	47.57%	6,394	43.63%	382	2.61%	586	4.00%
Other Multifamily	1,195	73.58%	228	14.04%	20	1.23%	135	8.31%
HCV Program	6,800	32.44%	12,925	61.67%	460	2.19%	471	2.25%
Total Households	1,107,382	84.24%	83,378	6.34%	45,365	3.45%	54,194	4.12%
0-30% of AMI	106,015	65.41%	30,656	18.91%	10,284	6.34%	9,033	5.57%
0-50% of AMI	179,095	57.82%	47,081	15.20%	20,259	6.54%	16,139	5.21%
0-80% of AMI	347,205	67.76%	60,470	11.80%	29,221	5.70%	24,262	4.73%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 24: Publicly Supported Housing Demographics, Washington County

Washington County	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	36	97.30%	1	2.70%	0	0.00%	0	0.00%
Project-Based Section 8	676	75.19%	168	18.69%	25	2.78%	26	2.89%
Other Multifamily	63	95.45%	1	1.52%	2	3.03%	0	0.00%
HCV Program	195	56.20%	134	38.62%	5	1.44%	11	3.17%
Total Households	60,315	92.55%	1,219	1.87%	1,441	2.21%	1,558	2.39%
0-30% of AMI	5,077	84.93%	405	6.77%	257	4.30%	109	1.82%
0-50% of AMI	8,360	68.68%	554	4.55%	592	4.86%	394	3.24%
0-80% of AMI	16,816	79.22%	677	3.19%	839	3.95%	585	2.76%
MSP Region	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	2,799	25.09%	6,246	55.98%	320	2.87%	1,669	14.96%
Project-Based Section 8	6,971	47.57%	6,394	43.63%	382	2.61%	586	4.00%
Other Multifamily	1,195	73.58%	228	14.04%	20	1.23%	135	8.31%
HCV Program	6,800	32.44%	12,925	61.67%	460	2.19%	471	2.25%
Total Households	1,107,382	84.24%	83,378	6.34%	45,365	3.45%	54,194	4.12%
0-30% of AMI	106,015	65.41%	30,656	18.91%	10,284	6.34%	9,033	5.57%
0-50% of AMI	179,095	57.82%	47,081	15.20%	20,259	6.54%	16,139	5.21%
0-80% of AMI	347,205	67.76%	60,470	11.80%	29,221	5.70%	24,262	4.73%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 25: Publicly Supported Housing Demographics, Woodbury City

Woodbury City	White		Black		Hispanic		Asian or Pacific Islander	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	30	48.39%	30	48.39%	1	1.61%	0	0.00%
Project-Based Section 8	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
Other Multifamily	N/a	N/a	0	0.00%	N/a	N/a	N/a	N/a
HCV Program	24	30.00%	53	66.25%	1	1.25%	1	1.25%
Total Households	19,305	83.35%	1,250	5.40%	545	2.35%	1,770	7.64%
0-30% of AMI	960	82.05%	105	8.97%	40	3.42%	55	4.70%
0-50% of AMI	1,735	66.86%	200	7.71%	125	4.82%	135	5.20%
0-80% of AMI	3,585	72.94%	385	7.83%	195	3.97%	340	6.92%
MSP Region	**White**		**Black**		**Hispanic**		**Asian or Pacific Islander**	
Housing Type	#	%	#	%	#	%	#	%
Public Housing	2,799	25.09%	6,24f6	55.98%	320	2.87%	1,669	14.96%
Project-Based Section 8	6,971	47.57%	6,394	43.63%	382	2.61%	586	4.00%
Other Multifamily	1,195	73.58%	228	14.04%	20	1.23%	135	8.31%
HCV Program	6,800	32.44%	12,925	61.67%	460	2.19%	471	2.25%
Total Households	1,107,382	84.24%	83,378	6.34%	45,365	3.45%	54,194	4.12%
0-30% of AMI	106,015	65.41%	30,656	18.91%	10,284	6.34%	9,033	5.57%
0-50% of AMI	179,095	57.82%	47,081	15.20%	20,259	6.54%	16,139	5.21%
0-80% of AMI	347,205	67.76%	60,470	11.80%	29,221	5.70%	24,262	4.73%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

In Project-Based Section 8 developments, the majority racial/ethnic group in every entitlement jurisdiction except for Eden Prairie, Minneapolis, and St. Paul is white (Woodbury City has no Project-Based Section 8 developments). In Anoka County, Bloomington, Minnetonka, Plymouth Ramsey County, and Washington County, white residents make up a supermajority while in

Dakota County and Hennepin County whites make up a majority. Black residents outnumber white residents in Eden Prairie, Minneapolis, and St. Paul by a ratio of approximately two to one. Representation by Hispanics and Asian or Pacific Islanders are under six percent in all jurisdictions except for Bloomington (13.93% Asian/Pacific Islander).

Housing Choice Voucher households are more evenly distributed across racial/ethnic groups in Anoka County, Dakota County, and Washington County. White residents comprise a supermajority in Plymouth and Ramsey County. Black residents make up a supermajority of HCV residents in Eden Prairie, Hennepin County, Minneapolis, and Woodbury City and a majority in Bloomington, Minnetonka, and St. Paul. Hispanic and Asian American or Pacific Islanders make up less than six percent of all HCV units throughout the Twin Cities region.

ii. Compare the racial/ethnic demographics of each program category of publicly supported housing for the jurisdiction to the demographics of the same program category in the region.

In the region, there are several important differences in occupancy between various types of publicly supported housing. Black residents are more likely to live in Public Housing where there is Public Housing and HCV, and white residents are more likely to live in Project-Based Section 8 and Other Multifamily developments. Hispanic and Asian American or Pacific Islander residents comprise a small percentage of residents in all publicly supported housing. LIHTC demographic data is not available at the regional level.

iii. Compare the demographics, in terms of protected class, of residents of each program category of publicly supported housing (public housing, project-based Section 8, Other Multifamily Assisted developments, and HCV) to the population in general, and persons who meet the income eligibility requirements for the relevant program category of publicly supported housing in the jurisdiction and region. Include in the comparison, a description of whether there is a higher or lower proportion of groups based on protected class.

Regionally, white residents tend to be proportionally represented in Other Multifamily housing and underrepresented among Public Housing, Project-Based Section 8 and Housing Choice Voucher holders, including when controlling for household income. Meanwhile, Hispanic residents tend to be underrepresented in every publicly supported housing category proportion to their share of the income-eligible population. This may result from eligibility rules for Project-Based Section 8 and the Housing Choice Voucher program that exclude undocumented immigrants. By contrast, the LIHTC program does not bar undocumented immigrants. Asian American or Pacific Islander residents tend to be either proportionally represented or overrepresented across types of publicly supported housing, with the greatest overrepresentation in Public Housing. Black residents make up a disproportionate share in every publicly supported housing category.

There are a few cities with somewhat more stark contrasts between the income-eligible population and the occupancy of particular types of publicly supported housing. In particular, white residents

tend to make up a disproportionate share of Other Multifamily occupants in Anoka County, Bloomington, Dakota County, Hennepin County, Minneapolis, Minnetonka, and Washington County. Whites are also overrepresented in Project-Based Section 8 housing in Anoka County, Plymouth, and Ramsey County. In Anoka County, Bloomington, Eden Prairie, Hennepin County, Minneapolis, Minnetonka, Plymouth, Ramsey County, St. Paul, and Woodbury City, Hispanics are underrepresented in every publicly supported housing category.

2. Publicly Supported Housing Location and Occupancy

i. Describe patterns in the geographic location of publicly supported housing by program category (public housing, project-based Section 8, Other Multifamily Assisted developments, HCV, and LIHTC) in relation to previously discussed segregated areas and R/ECAPs in the jurisdiction and region.

Map 1: Publicly Supported Housing and Race/Ethnicity

There are eleven R/ECAPs in the Twin Cities Region and they are located in either Minneapolis or in St. Paul. Each R/ECAP contains a significant amount of publicly supported housing. Overall, publicly supported housing in the Region is predominantly clustered in or nearby R/ECAPS in Minneapolis and St. Paul and then scattered throughout the remaining region, particularly in the case of Public Housing, Project-Based Section 8, and Other Multifamily developments. LIHTC and Housing Choice Voucher units are more widely scattered throughout the Region. In the broader region, there are fewer publicly supported housing developments the greater distance from Minneapolis and St. Paul. Within Anoka County, all types of publicly supported housing are most heavily concentrated in Coon Rapids. There are no areas of concentration of publicly supported housing in Carver County. In Dakota County, all types of publicly supported housing are concentrated in Burnsville while Public Housing, Project-Based Section 8, and LIHTC developments are also concentrated in West St. Paul and South St. Paul but Other Multifamily developments are not. In Hennepin County outside of Minneapolis, there are concentrations of hard units of publicly supported housing in Bloomington, Brooklyn Center, and Hopkins. Brooklyn Center also has concentrations of voucher holders. Brooklyn Center is an area of relative segregation in comparison to the broader region. In Ramsey County outside of St. Paul, there are concentrations of multiple types of publicly supported housing in Maplewood. In Scott County, publicly supported housing is relatively concentrated in Shakopee. In Washington County, outside of a pocket in Stillwater, most publicly supported county is located across the western edge of the county on its border with adjoining counties.

ii. Describe patterns in the geographic location for publicly supported housing that primarily serves families with children, elderly persons, or persons with disabilities in relation to previously discussed segregated areas or R/ECAPs in the jurisdiction and region.

In general, publicly supported housing for families with children is most heavily concentrated in parts of Minneapolis and St. Paul that are either R/ECAPs or are located adjacent to R/ECAPs. Publicly supported housing for elderly persons or persons with disabilities is more broadly distributed throughout the region although there is still a disproportionate share of such housing in the central cities of Minneapolis and St. Paul.

iii. How does the demographic composition of occupants of publicly supported housing in R/ECAPS compare to the demographic composition of occupants of publicly supported housing outside of R/ECAPs in the jurisdiction and region?

Only jurisdictions which contain R/ECAPs have been included below. Rows with only 0 and/or N/A values have been deleted for space. In Minneapolis, the residents of publicly supported housing in R/ECAPs are more likely to be Black, to be families with children, and to not have disabilities than the residents of publicly supported housing outside of R/ECAPs. The same is true albeit to a lesser extent in St. Paul where Other Multifamily residents in R/ECAPs are actually less likely to be Black than residents of such housing outside of R/ECAPs. This is likely the result of one Other Multifamily development in a heavily Asian and Pacific Islander R/ECAP neighborhood having an outsized influence on the data.

Table 26: Minneapolis

Minneapolis	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	2,688	8.53%	81.08%	1.53%	7.59%	30.88%	45.48%	48.09%
Non R/ECAP tracts	3,255	23.40%	68.37%	2.27%	4.36%	4.85%	56.56%	60.06%
Project-based Section 8								
R/ECAP tracts	2,529	11.98%	72.18%	1.51%	5.87%	33.80%	31.46%	17.54%
Non R/ECAP tracts	1,692	46.23%	47.25%	2.16%	1.92%	15.22%	39.88%	30.67%
Other Multifamily								
R/ECAP tracts	104	21.21%	58.59%	0.00%	1.01%	0.97%	100.00%	7.77%
Non R/ECAP tracts	166	78.53%	14.11%	2.45%	2.45%	0.56%	73.45%	30.51%
HCV Program								
R/ECAP tracts	1,907	7.99%	87.56%	1.42%	0.96%	63.96%	13.33%	14.95%
Non R/ECAP tracts	2,398	20.86%	73.42%	1.81%	1.03%	49.49%	15.30%	25.24%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 27: St. Paul

St. Paul	Total # units (occupied)	% White	% Black	% Hispanic	% Asian or Pacific Islander	% Families with children	% Elderly	% with a disability
Public Housing								
R/ECAP tracts	2,317	13.38%	36.94%	2.68%	46.48%	54.48%	21.94%	24.48%
Non R/ECAP tracts	1,846	46.76%	34.91%	5.60%	11.69%	5.42%	36.26%	61.03%
Project-based Section 8								
R/ECAP tracts	1,081	15.19%	73.25%	5.50%	5.68%	34.03%	24.34%	27.26%
Non R/ECAP tracts	1,776	33.61%	53.64%	5.68%	5.79%	32.41%	41.25%	18.43%
Other Multifamily								
R/ECAP tracts	135	19.40%	18.66%	2.24%	43.28%	0.73%	100.00%	13.14%
Non R/ECAP tracts	187	54.40%	24.73%	0.00%	20.88%	N/a	100.00%	0.00%
HCV Program								
R/ECAP tracts	1,130	15.76%	71.58%	3.94%	6.94%	59.65%	8.60%	19.95%
Non R/ECAP tracts	3,280	28.66%	60.12%	4.03%	5.38%	46.70%	18.31%	28.93%

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

iv. Do any developments of public housing, properties converted under the RAD, and LIHTC developments have a significantly different demographic composition, in terms of protected class, than other developments of the same category for the jurisdiction? Describe how these developments differ.

See Tables in Appendix

i. Provide additional relevant information, if any, about occupancy, by protected class, in other types of publicly supported housing for the jurisdiction and region.

The analysis above provides a comprehensive look at issues for which there is data reflecting access to publicly supported housing by protected class status in the region. As jurisdictions begin to adopt and implement inclusionary zoning ordinances, it will be critical that they impose data collection requirements on housing providers and monitor occupancy information to ensure that members of protected classes have equal access to newly developed units.

ii. Compare the demographics of occupants of developments in the jurisdiction, for each category of publicly supported housing (public housing, project-based Section 8, Other

Multifamily Assisted developments, properties converted under RAD, and LIHTC) to the demographic composition of the areas in which they are located. For the jurisdiction, describe whether developments that are primarily occupied by one race/ethnicity are located in areas occupied largely by the same race/ethnicity. Describe any differences for housing that primarily serves families with children, elderly persons, or persons with disabilities.

See table in appendix

3. Disparities in Access to Opportunity

i. Describe any disparities in access to opportunity for residents of publicly supported housing in the jurisdiction and region, including within different program categories (public housing, project-based Section 8, Other Multifamily Assisted Developments, HCV, and LIHTC) and between types (housing primarily serving families with children, elderly persons, and persons with disabilities) of publicly supported housing.

As discussed above, across categories, publicly supported housing in the Twin Cities region is heavily concentrated in portions of Minneapolis and St. Paul that include several R/ECAPs and are areas of Black, Hispanic, and Asian and Pacific Islander population concentration. The Disparities in Access to Opportunity section of this Assessment shows that these areas consistently have lower access to proficient schools and environmental health than the region as a whole while having greater transit access and job proximity. Although these disparities span categories of publicly supported housing, they are more pronounced for Public Housing than they are for Other Multifamily housing, which is often subject to less community opposition because it tends not to include families with children, and LIHTC developments, which tend to be more recently developed.

<u>Contributing Factors of Publicly Supported Housing Location and Occupancy</u>

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of fair housing issues related to publicly supported housing, including Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor that is significant, note which fair housing issue(s) the selected contributing factor relates to.

Please see the Appendix for the following Contributing Factors to Publicly Supported Housing Location and Occupancy:

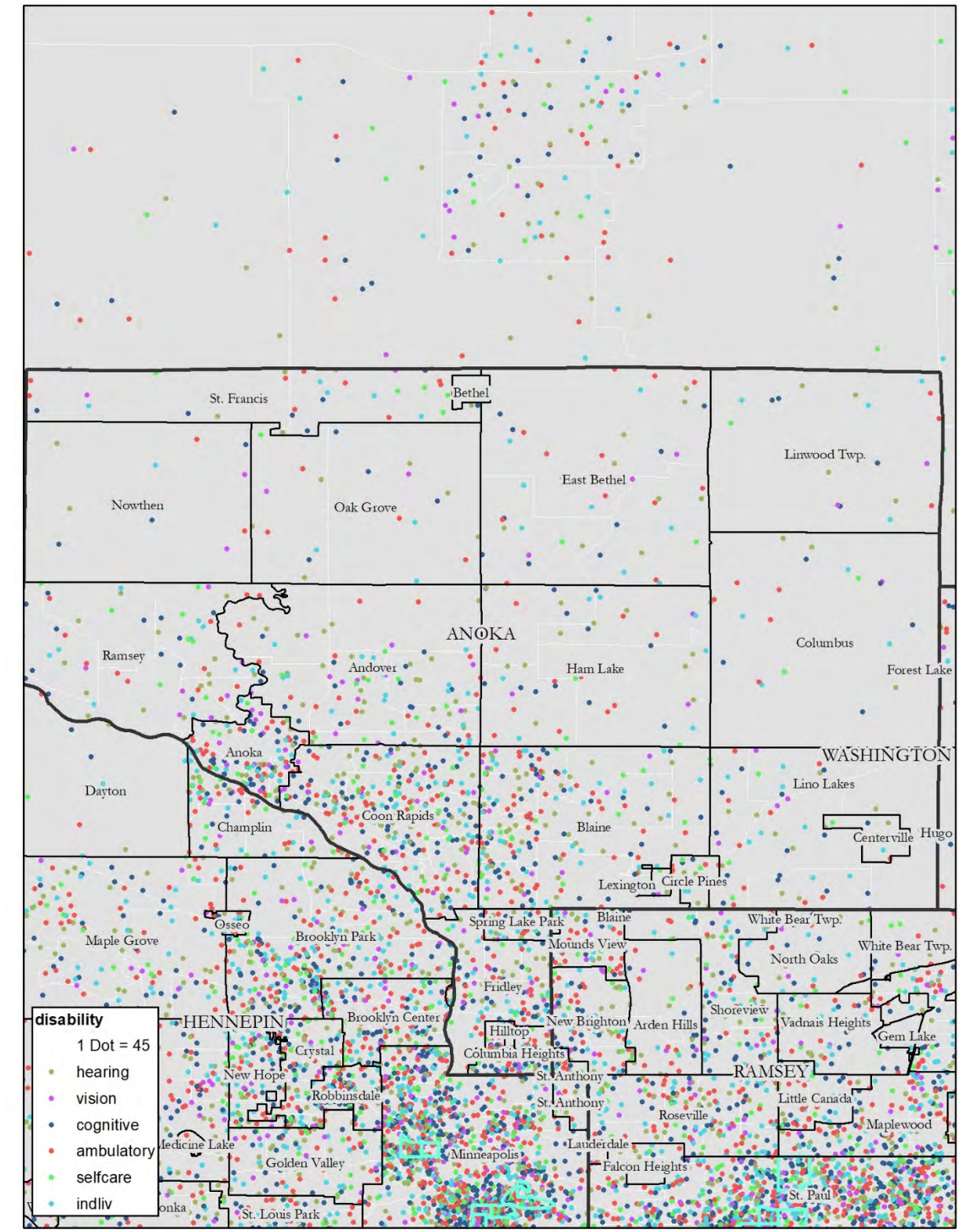
- Admissions and occupancy policies and procedures, including preferences in publicly supported housing
- Community opposition
- Displacement of residents due to economic pressures
- Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
- Impediments to mobility

- Lack of access to opportunity due to high housing costs
- Lack of meaningful language access for individuals with limited English proficiency
- Lack of local or regional cooperation
- Lack of private investment in specific neighborhoods
- Lack of public investment in specific neighborhoods, including services and amenities
- Land use and zoning laws
- Loss of affordable housing
- Occupancy codes and restrictions
- Quality of affordable housing information programs
- Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
- Source of income discrimination

D. Disability and Access

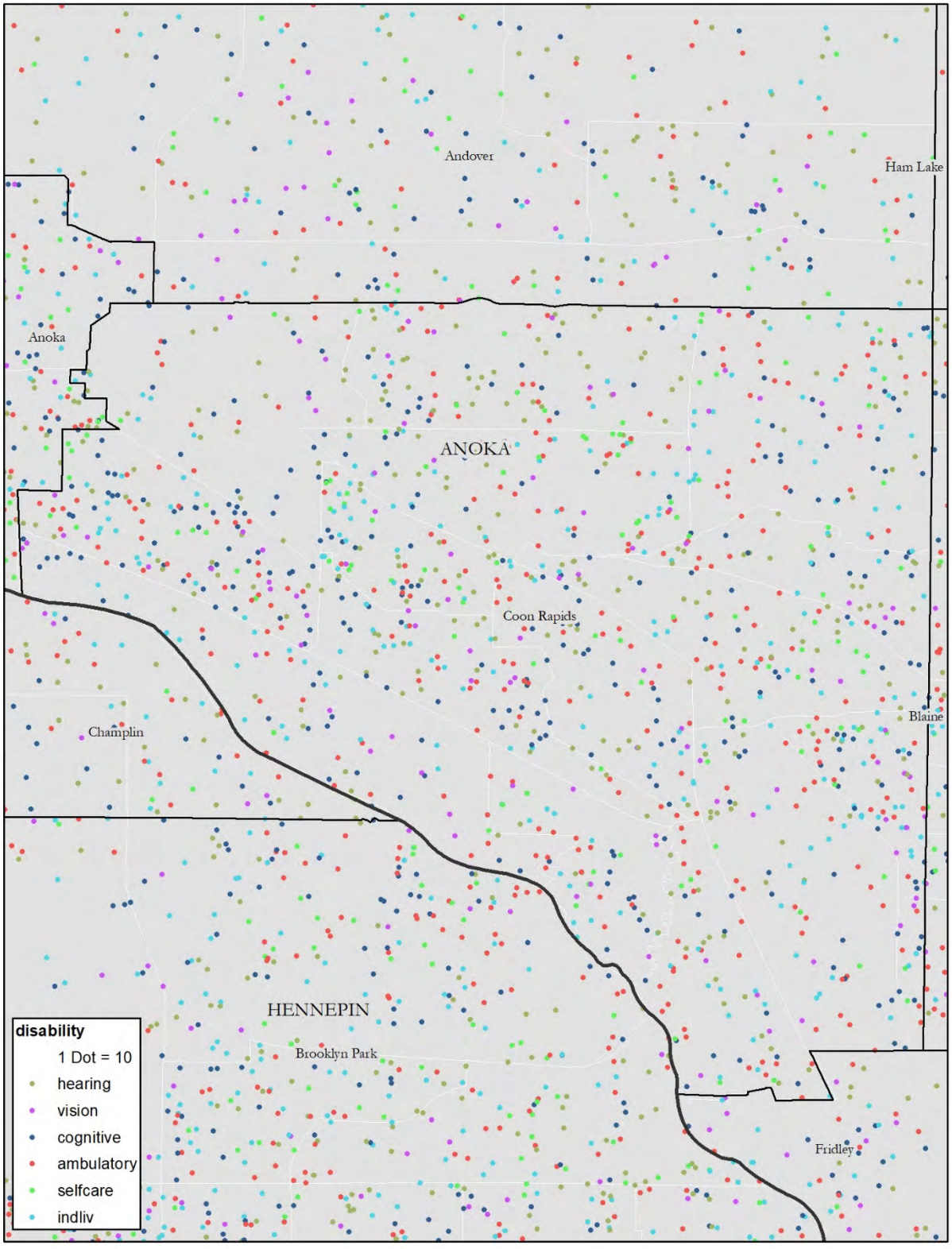
Population Profile

Map 1: Disability by Type, Anoka County[42]



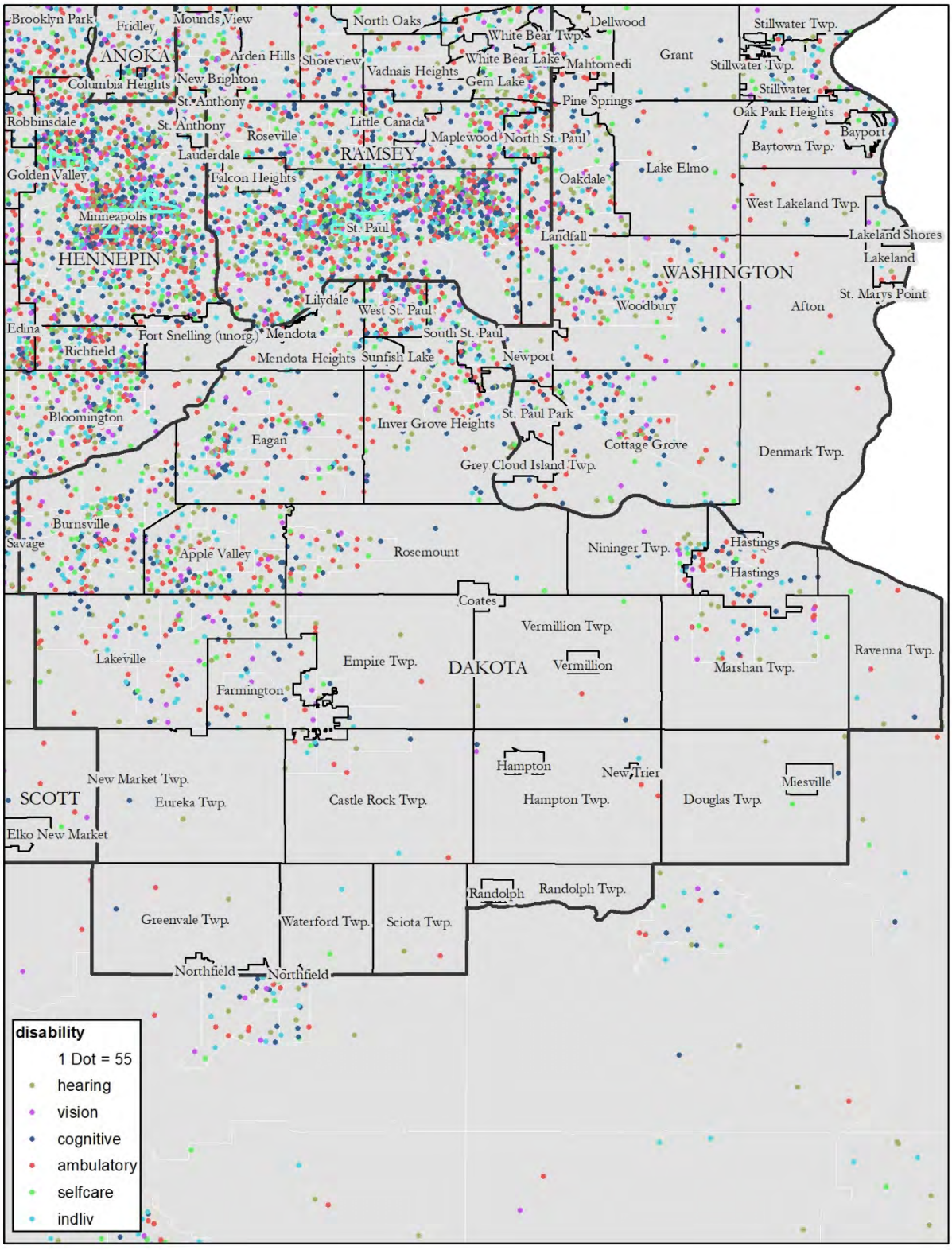
[42] *Source: American Community Survey Estimates, 2013-2017.*

Map 2: Disability by Type, Coon Rapids[43]



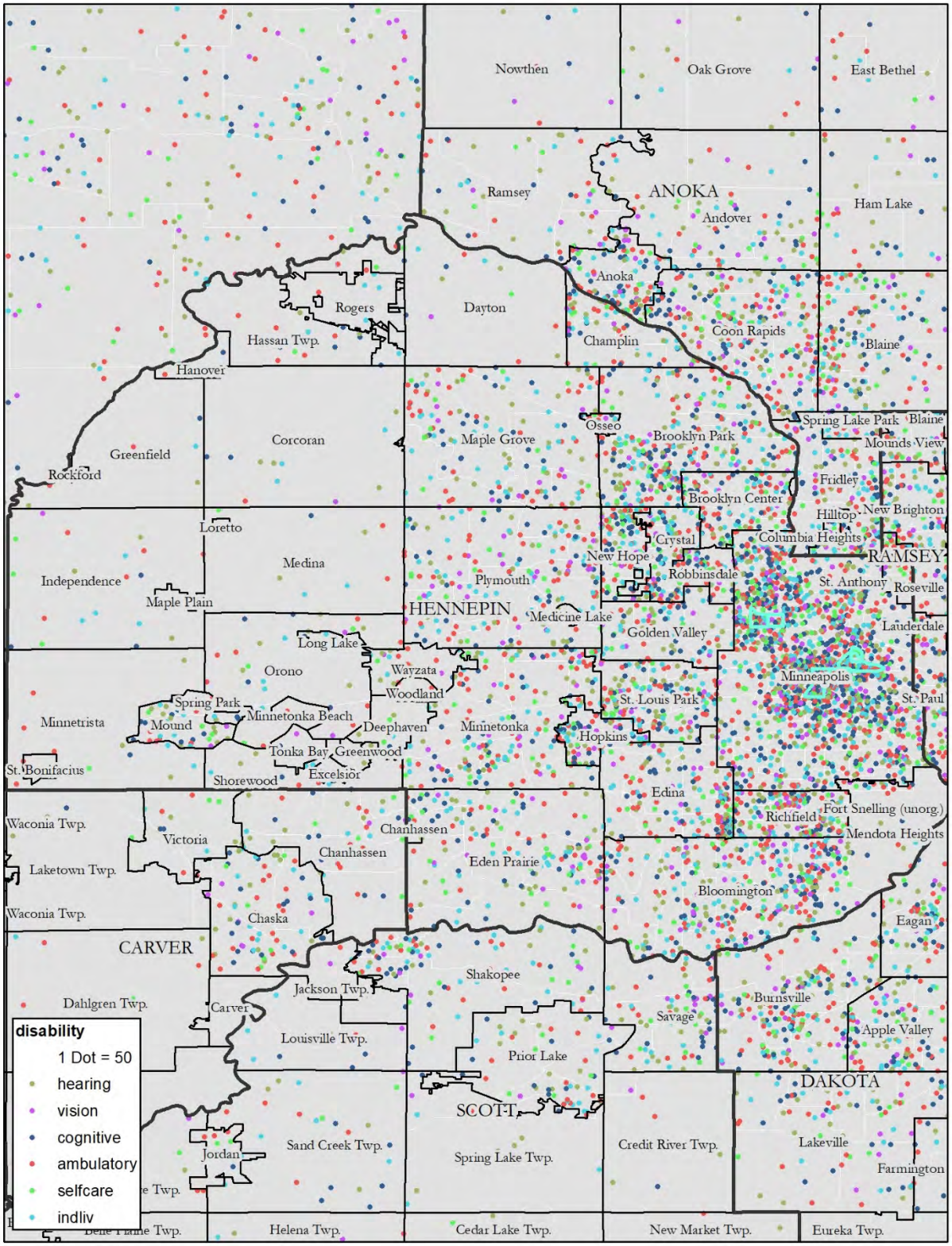
[43] *Source: American Community Survey Estimates, 2013-2017.*

Map 3: Disability by Type, Dakota County[44]



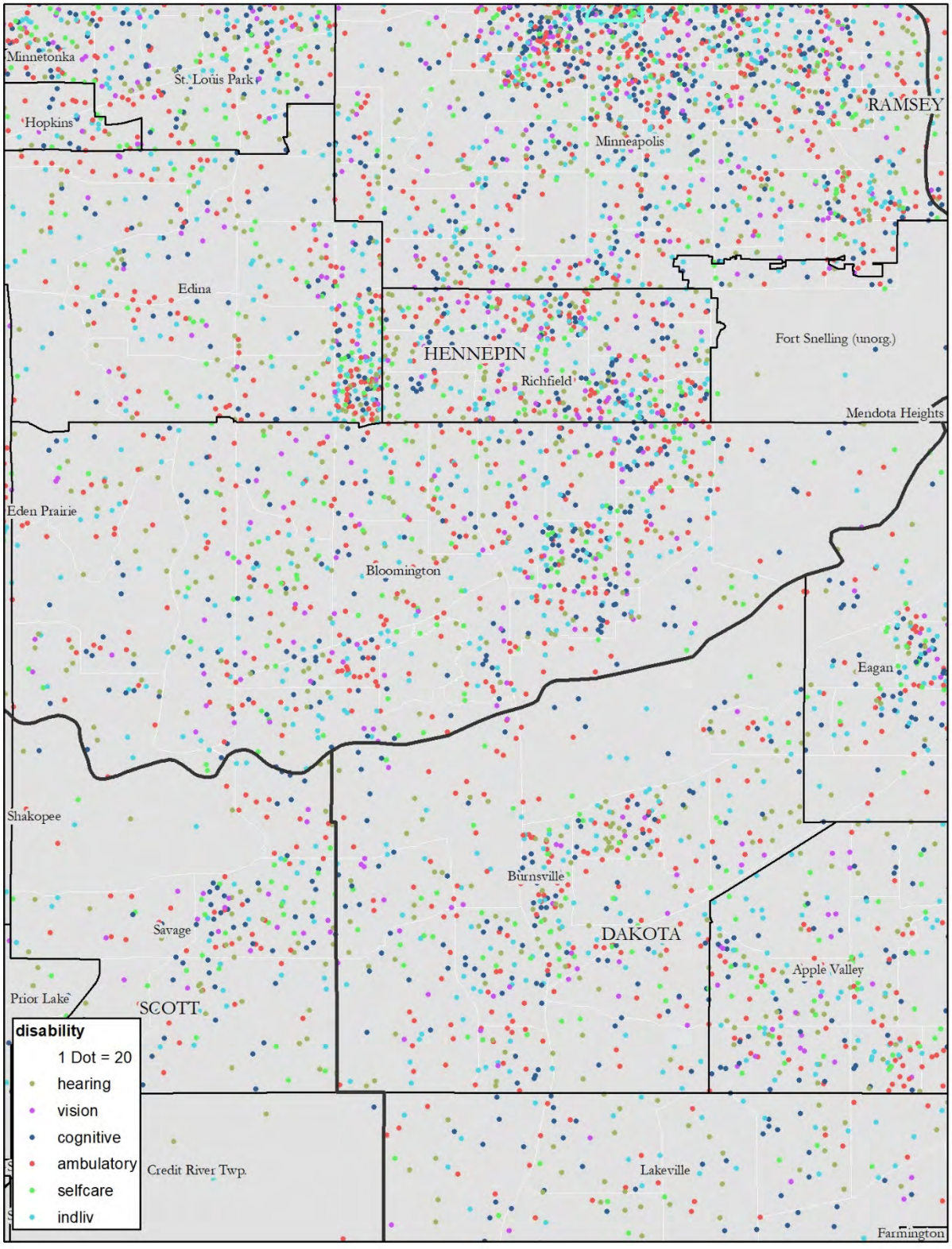
[44] *Source: American Community Survey Estimates, 2013-2017.*

Map 4: Disability by Type, Hennepin County[45]



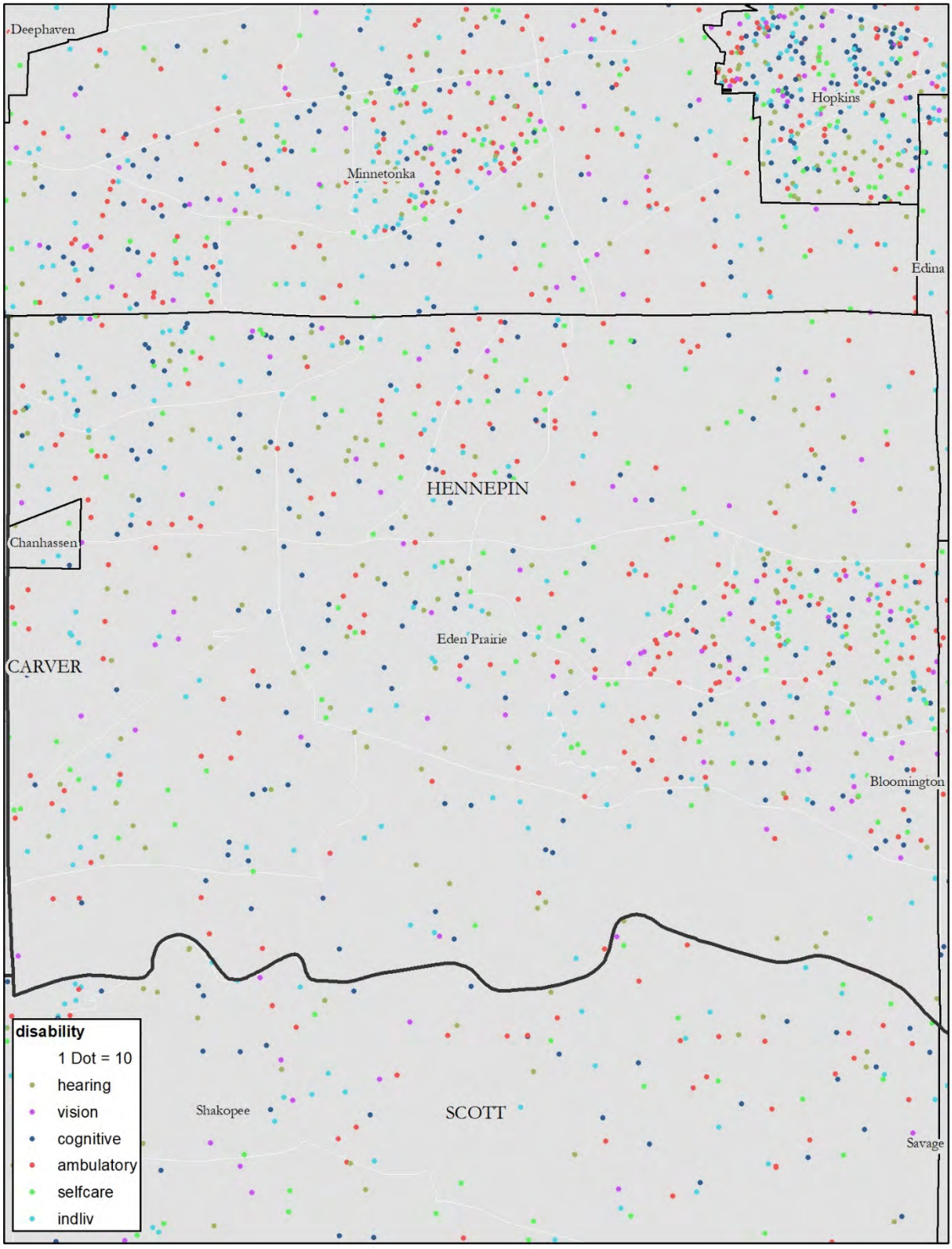
[45] *Source: American Community Survey Estimates, 2013-2017.*

Map 5: Disability by Type, Bloomington[46]



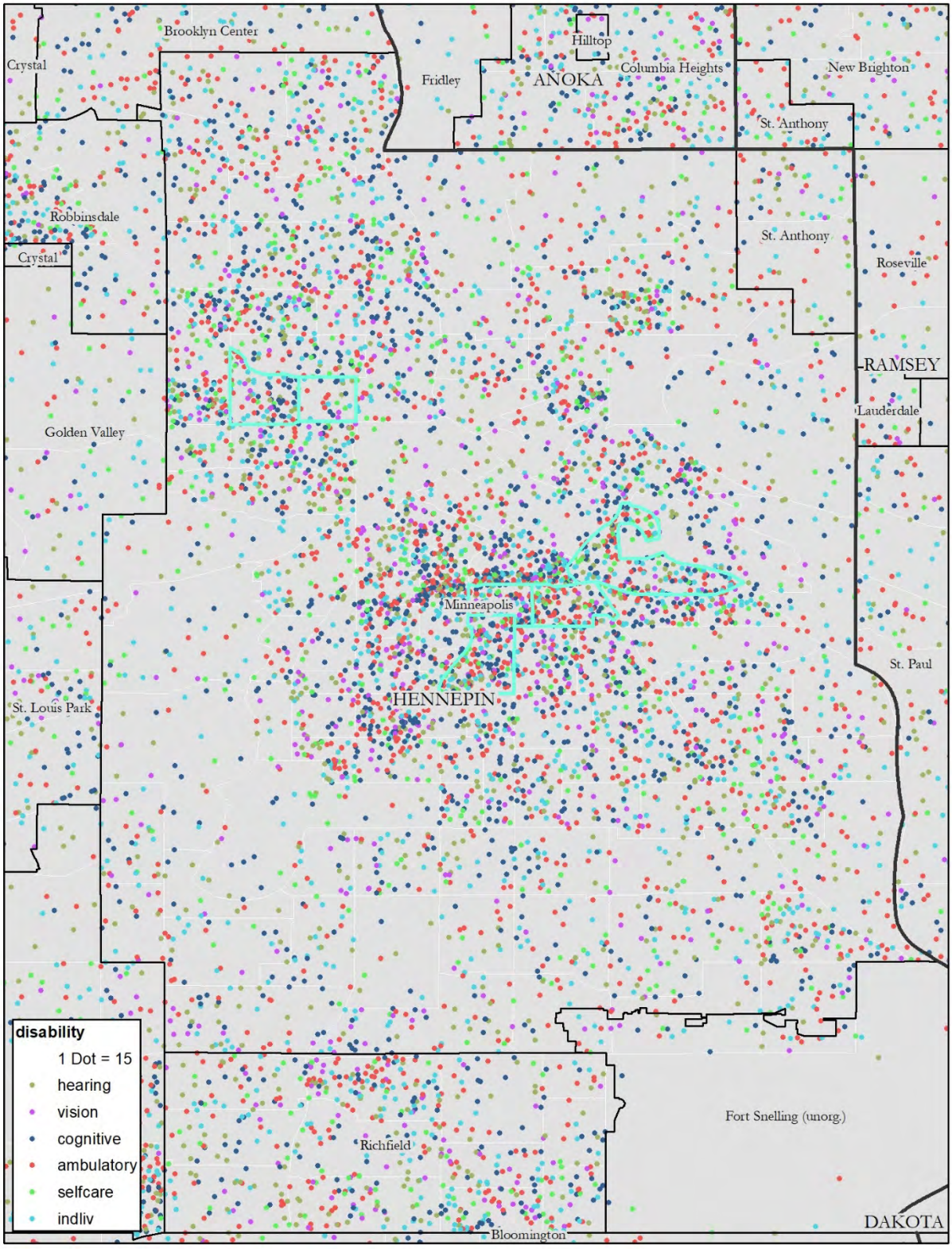
[46] *Source: American Community Survey Estimates, 2013-2017.*

Map 6: Disability by Type, Eden Prairie[47]



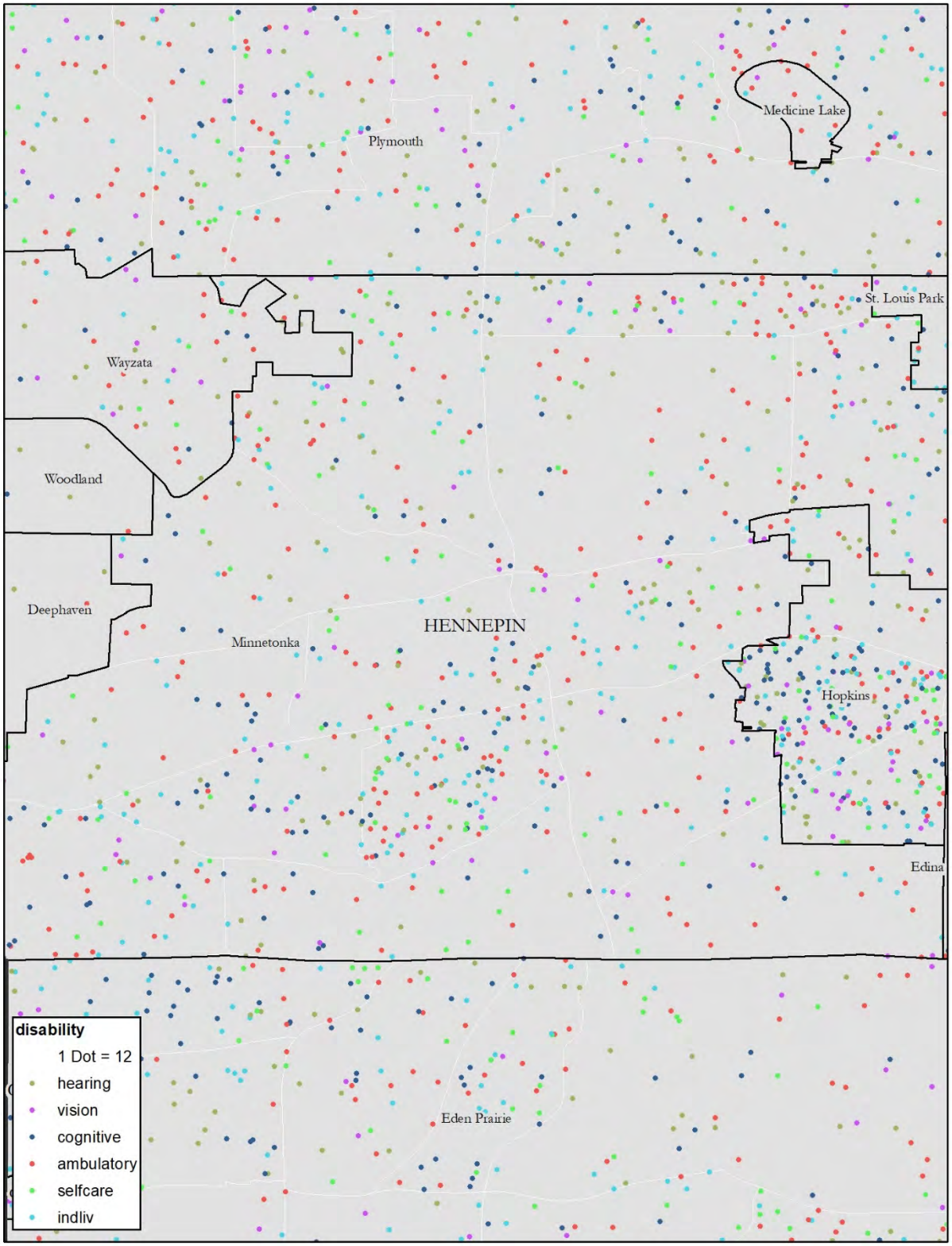
[47] *Source: American Community Survey Estimates, 2013-2017.*

Map 7: Disability by Type, Minneapolis[48]



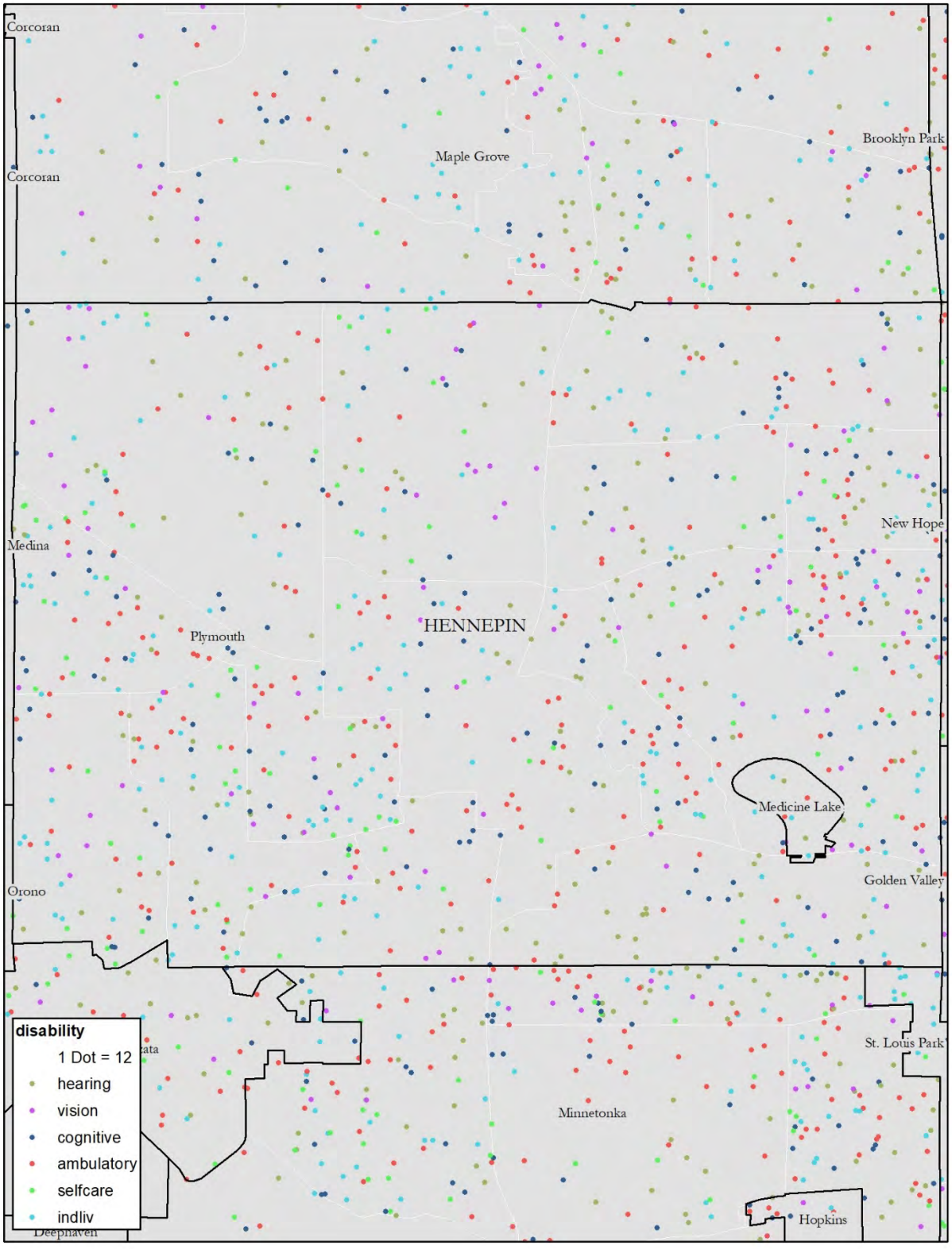
[48] *Source: American Community Survey Estimates, 2013-2017.*

Map 8: Disability by Type, Minnetonka[49]



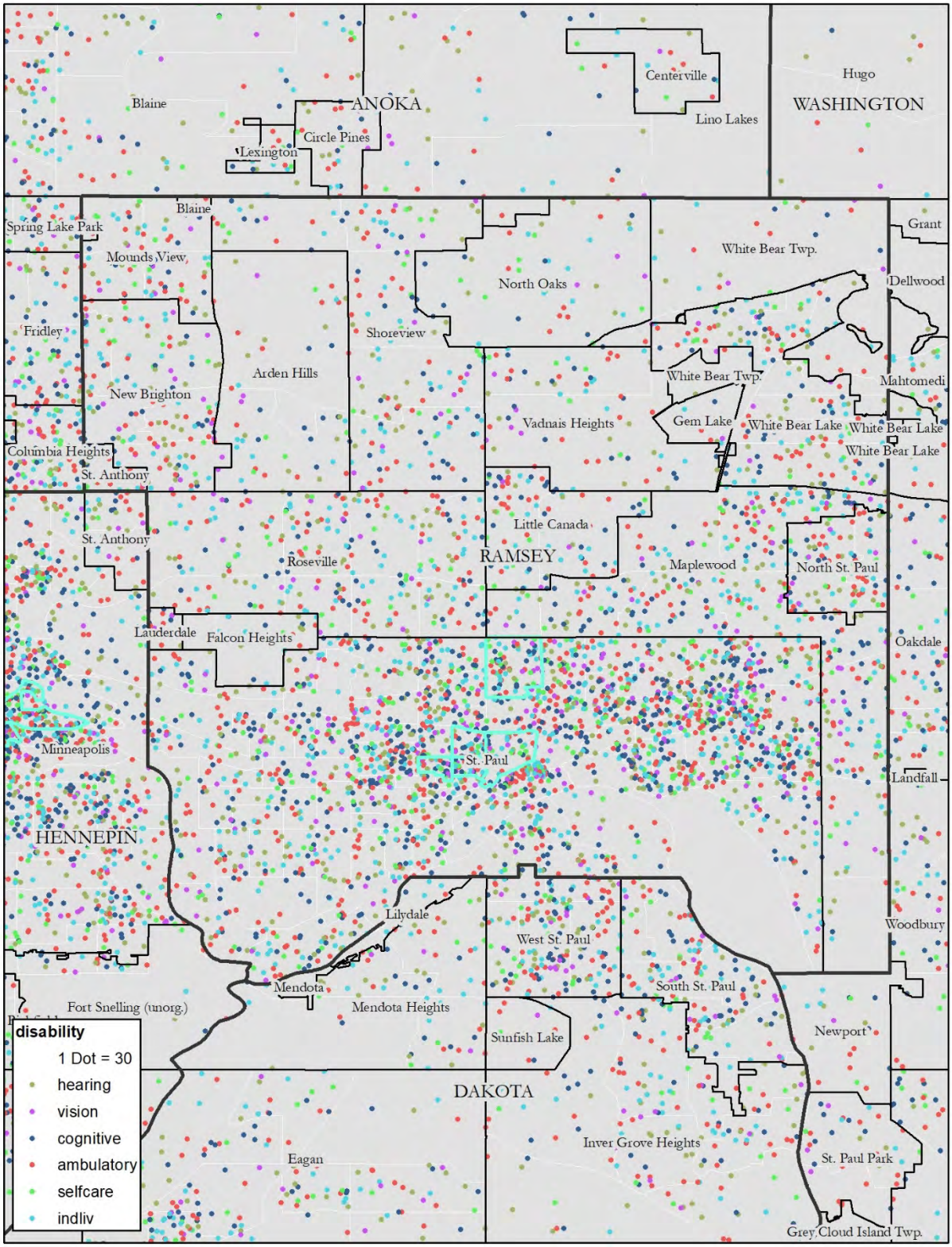
[49] *Source: American Community Survey Estimates, 2013-2017.*

Map 9: Disability by Type, Plymouth[50]



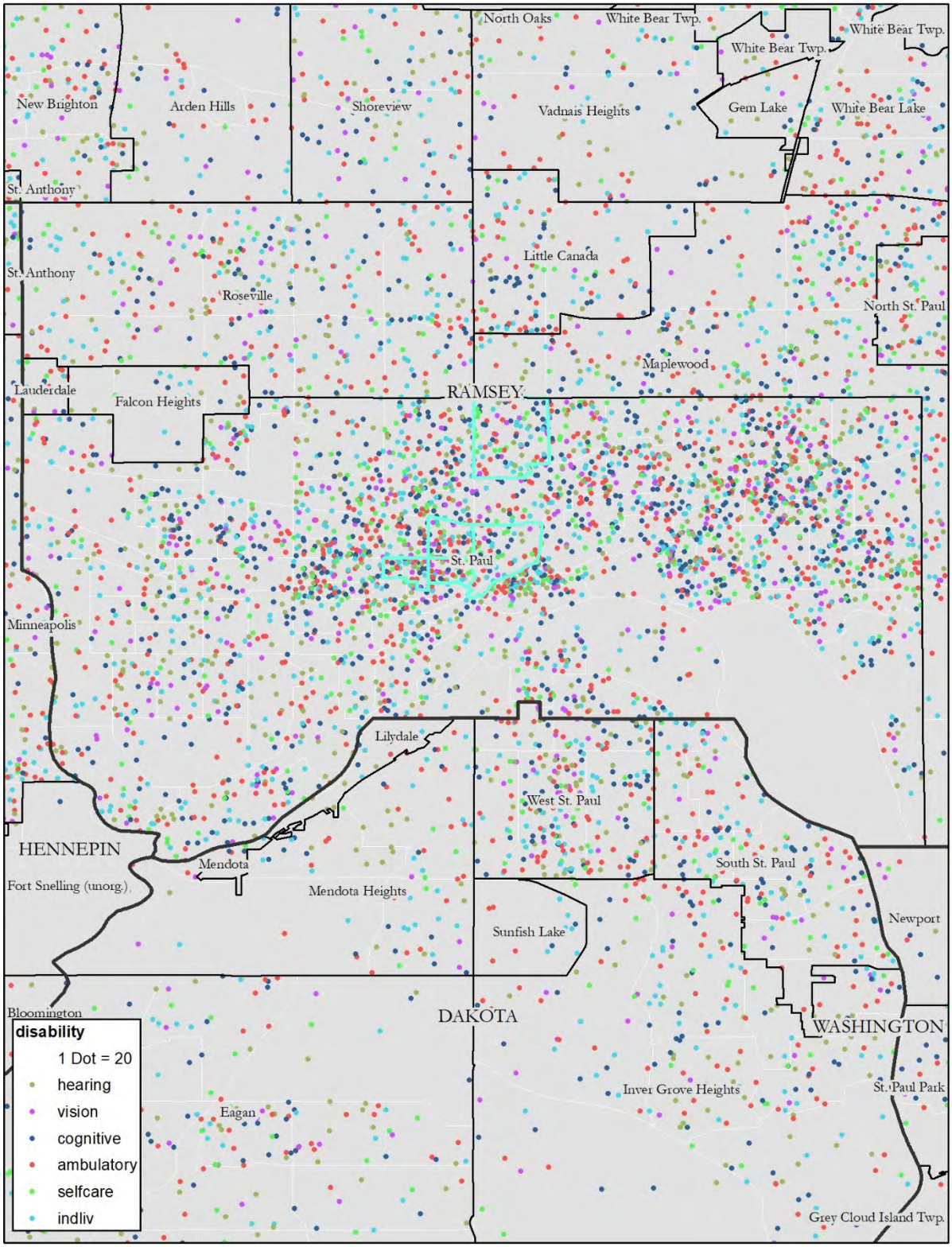
[50] *Source: American Community Survey Estimates, 2013-2017.*

Map 10: Disability by Type, Ramsey County[51]



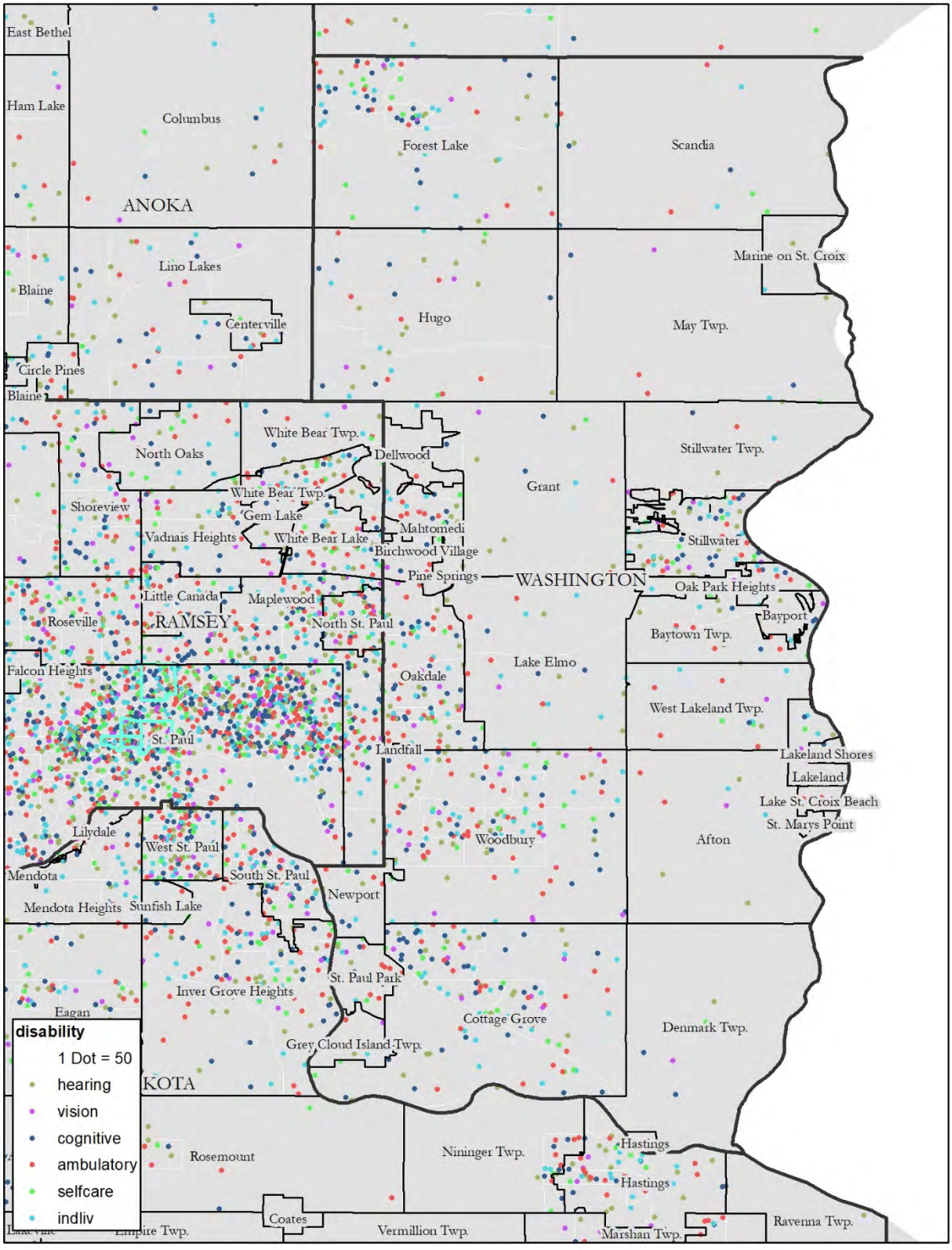
[51] *Source: American Community Survey Estimates, 2013-2017.*

Map 11: Disability by Type, St. Paul[52]



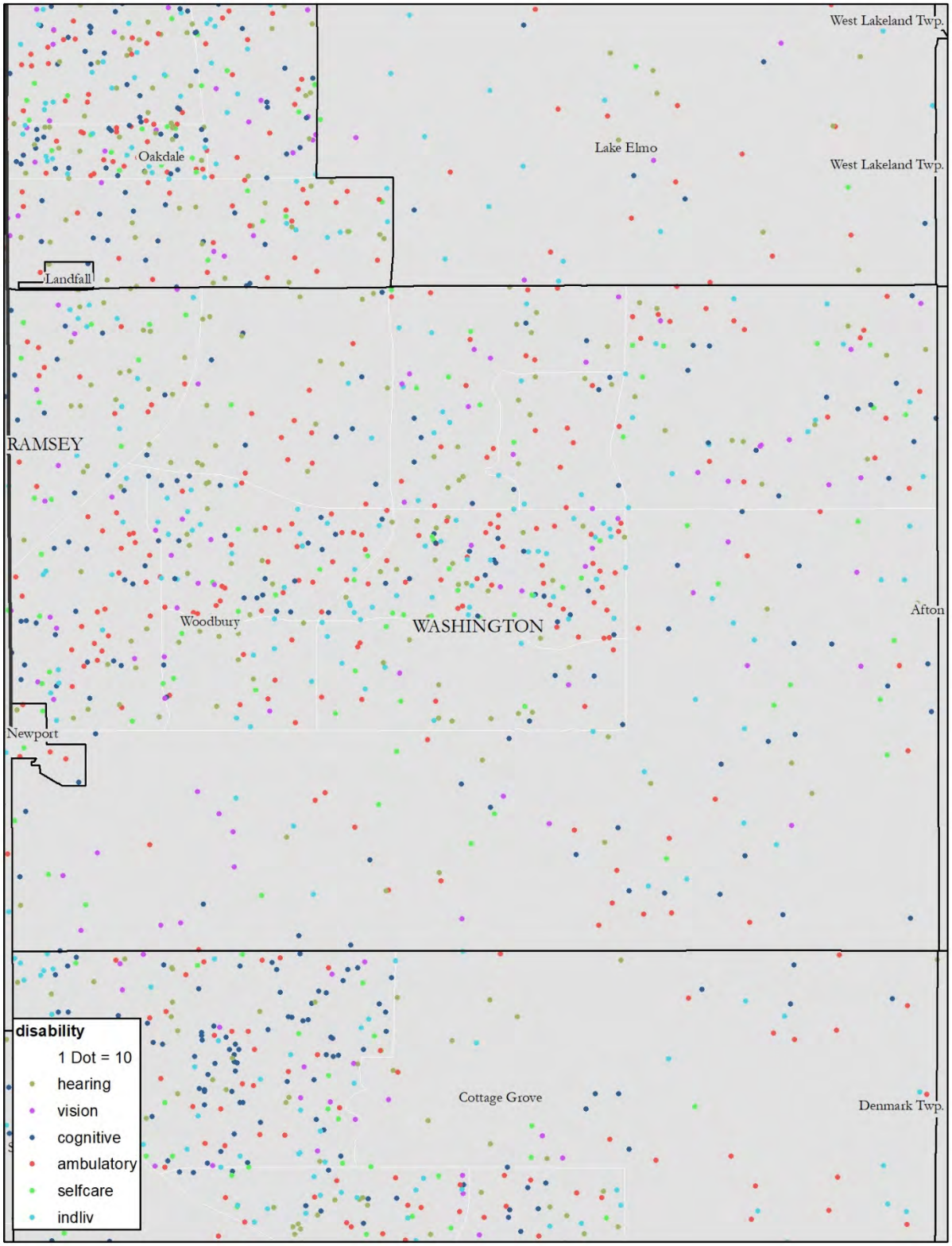
[52] *Source: American Community Survey Estimates, 2013-2017.*

Map 12: Disability by Type, Washington County[53]



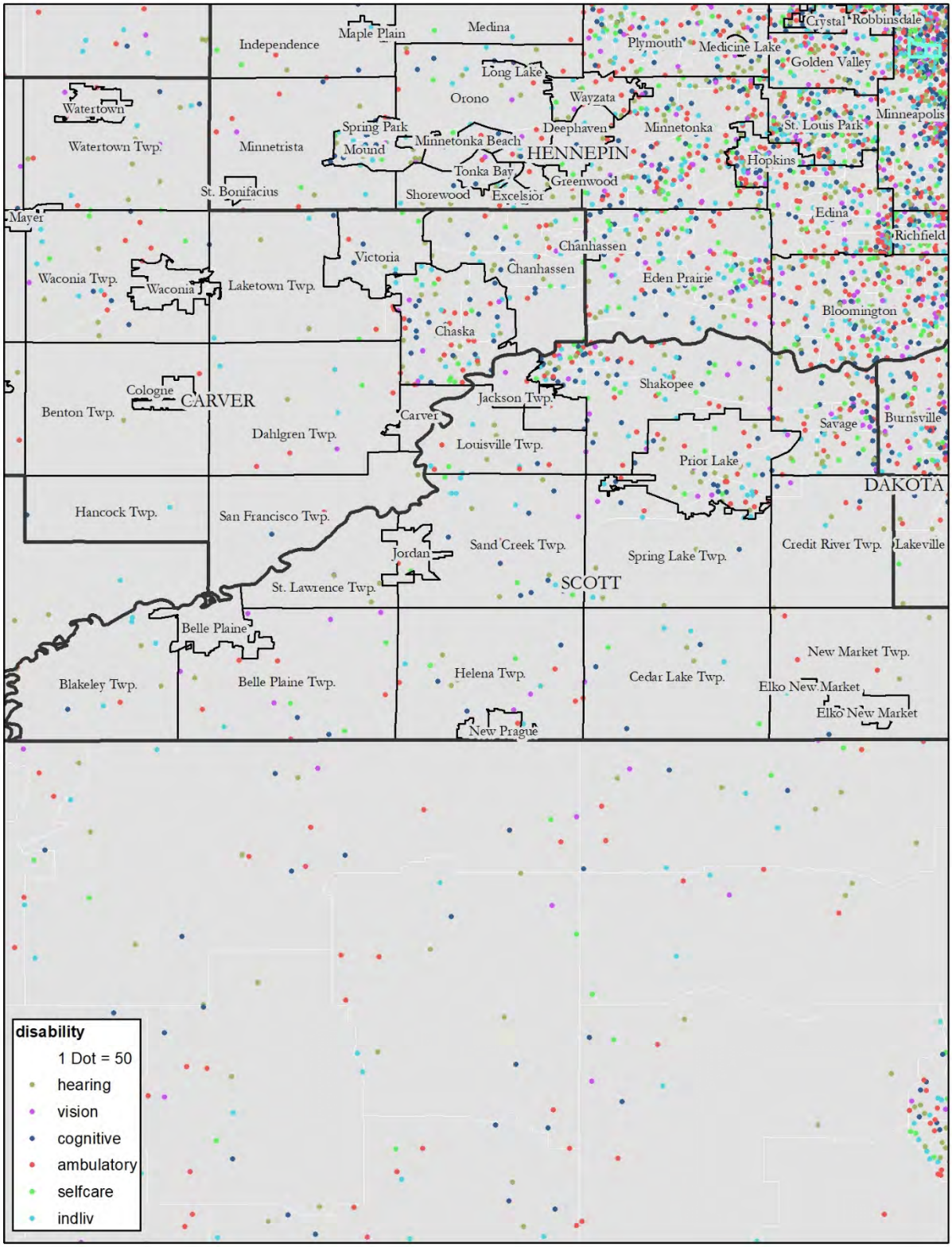
[53] *Source: American Community Survey Estimates, 2013-2017.*

Map 13: Disability by Type, Woodbury[54]



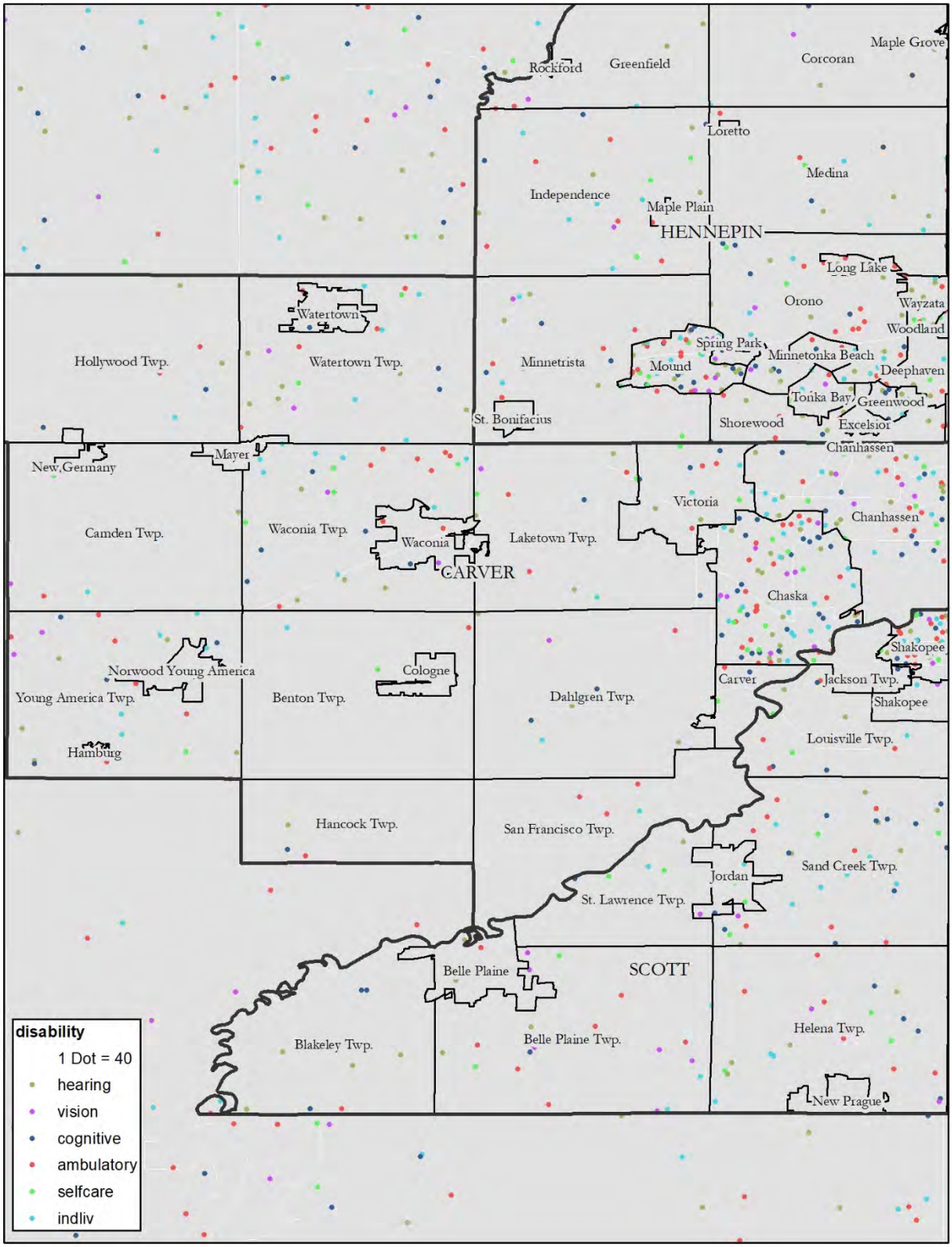
[54] *Source: American Community Survey Estimates, 2013-2017.*

Map 14: Disability by Type, Scott County[55]



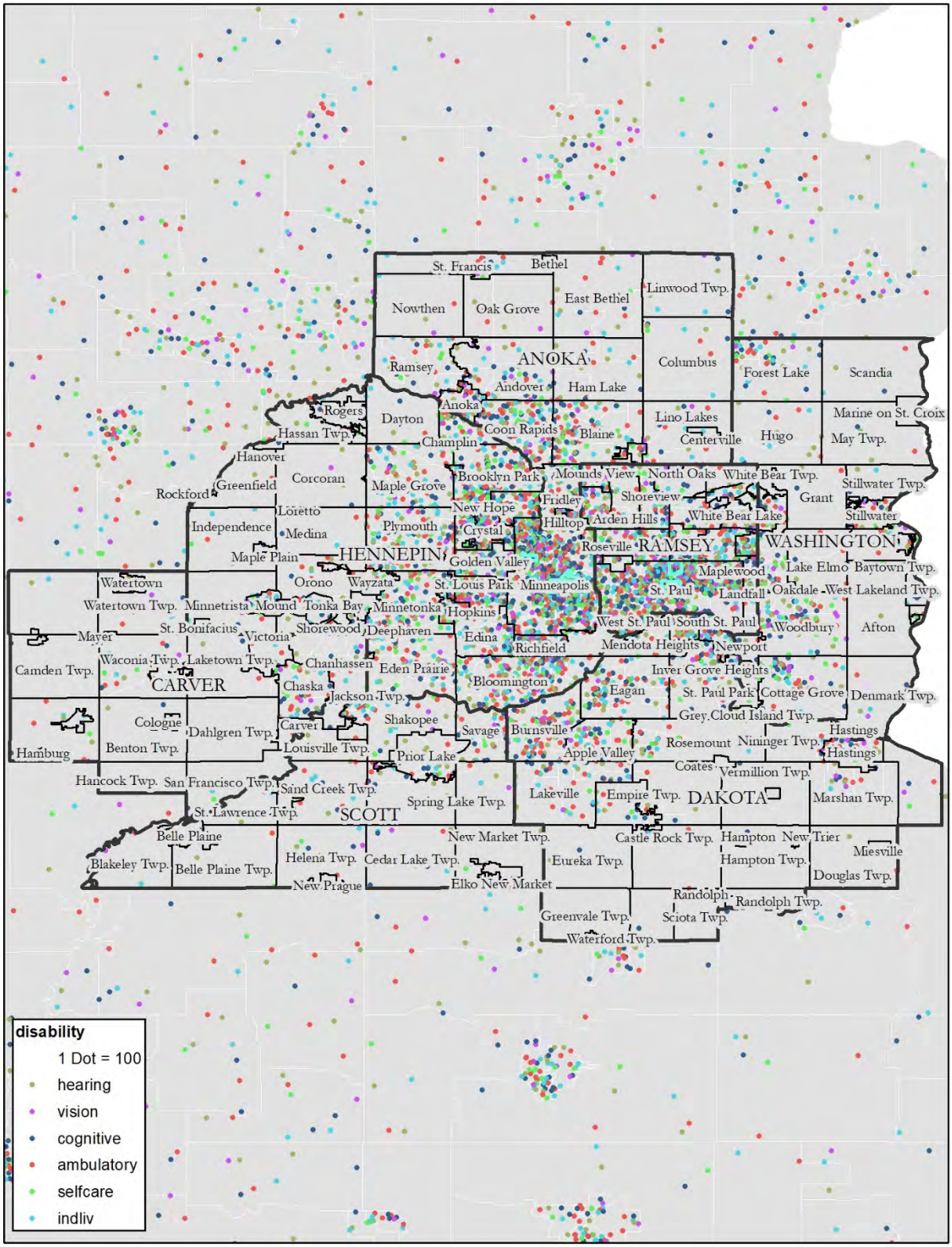
[55] *Source: American Community Survey Estimates, 2013-2017.*

Map 15: Disability by Type, Carver County[56]



[56] *Source: American Community Survey Estimates, 2013-2017.*

Map 16: Disability by Type, Region[57]



[57] *Source: American Community Survey Estimates, 2013-2017.*

Table 1: Disability by Type, Anoka County

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	11,250	3.3%	105,329	3.0%
Vision Difficulty	5,083	1.5%	49,528	1.4%
Cognitive Difficulty	13,454	4.2%	138,788	4.2%
Ambulatory Difficulty	13,471	4.2%	148,966	4.6%
Self-Care Difficulty	5,850	1.8%	65,395	2.0%
Independent Living Difficulty	10,674	4.1%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

Table 2: Disability by Type, Coon Rapids

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	2,346	3.8%	105,329	3.0%
Vision Difficulty	963	1.6%	49,528	1.4%
Cognitive Difficulty	2,864	4.9%	138,788	4.2%
Ambulatory Difficulty	2,821	4.9%	148,966	4.6%
Self-Care Difficulty	1,101	1.9%	65,395	2.0%
Independent Living Difficulty	2,184	4.5%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

Table 3: Disability by Type, Dakota County

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	11,500	2.8%	105,329	3.0%
Vision Difficulty	4,686	1.1%	49,528	1.4%
Cognitive Difficulty	13,749	3.6%	138,788	4.2%
Ambulatory Difficulty	15,633	4.1%	148,966	4.6%
Self-Care Difficulty	6,437	1.7%	65,395	2.0%
Independent Living Difficulty	11,718	3.8%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

Table 4: Disability by Type, Hennepin County

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	34,835	2.9%	105,329	3.0%
Vision Difficulty	18,382	1.5%	49,528	1.4%
Cognitive Difficulty	50,651	4.5%	138,788	4.2%
Ambulatory Difficulty	54,144	4.8%	148,966	4.6%
Self-Care Difficulty	24,294	2.1%	65,395	2.0%
Independent Living Difficulty	43,381	4.6%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

Table 5: Disability by Type, Bloomington

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	3,108	3.7%	105,329	3.0%
Vision Difficulty	1,625	1.9%	49,528	1.4%
Cognitive Difficulty	3,687	4.6%	138,788	4.2%
Ambulatory Difficulty	4,433	5.6%	148,966	4.6%
Self-Care Difficulty	1,961	2.5%	65,395	2.0%
Independent Living Difficulty	3,469	5.1%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

Table 6: Disability by Type, Eden Prairie

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	1,412	2.2%	105,329	3.0%
Vision Difficulty	698	1.1%	49,528	1.4%
Cognitive Difficulty	1,624	2.7%	138,788	4.2%
Ambulatory Difficulty	1,769	3.0%	148,966	4.6%
Self-Care Difficulty	1,073	1.8%	65,395	2.0%
Independent Living Difficulty	1,502	3.1%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

Table 7: Disability by Type, Minneapolis

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	10,690	2.6%	105,329	3.0%
Vision Difficulty	7,338	1.8%	49,528	1.4%
Cognitive Difficulty	22,024	5.8%	138,788	4.2%
Ambulatory Difficulty	20,185	5.3%	148,966	4.6%
Self-Care Difficulty	8,480	2.2%	65,395	2.0%
Independent Living Difficulty	15,251	4.7%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

Table 8: Disability by Type, Minnetonka

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	1,455	2.8%	105,329	3.0%
Vision Difficulty	651	1.3%	49,528	1.4%
Cognitive Difficulty	1,687	3.4%	138,788	4.2%
Ambulatory Difficulty	2,502	5.1%	148,966	4.6%
Self-Care Difficulty	1,104	2.3%	65,395	2.0%
Independent Living Difficulty	1,771	4.3%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

Table 9: Disability by Type, Plymouth

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	1,929	2.6%	105,329	3.0%
Vision Difficulty	1,047	1.4%	49,528	1.4%
Cognitive Difficulty	1,895	2.7%	138,788	4.2%
Ambulatory Difficulty	2,483	3.5%	148,966	4.6%
Self-Care Difficulty	1,089	1.5%	65,395	2.0%
Independent Living Difficulty	2,104	3.6%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

Table 10: Disability by Type, Ramsey County

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	17,277	3.2%	105,329	3.0%
Vision Difficulty	9,489	1.8%	49,528	1.4%
Cognitive Difficulty	26,808	5.4%	138,788	4.2%
Ambulatory Difficulty	27,833	5.6%	148,966	4.6%
Self-Care Difficulty	12,343	2.5%	65,395	2.0%
Independent Living Difficulty	23,053	5.6%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

Table 11: Disability by Type, St. Paul

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	9,127	3.1%	105,329	3.0%
Vision Difficulty	5,944	2.0%	49,528	1.4%
Cognitive Difficulty	16,589	6.0%	138,788	4.2%
Ambulatory Difficulty	15,452	5.6%	148,966	4.6%
Self-Care Difficulty	7,351	2.7%	65,395	2.0%
Independent Living Difficulty	12,800	5.8%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

Table 12: Disability by Type, Washington County

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	7,297	2.9%	105,329	3.0%
Vision Difficulty	2,761	1.1%	49,528	1.4%
Cognitive Difficulty	8,882	3.8%	138,788	4.2%
Ambulatory Difficulty	8,696	3.7%	148,966	4.6%
Self-Care Difficulty	3,889	1.7%	65,395	2.0%
Independent Living Difficulty	6,918	3.7%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

Table 13: Disability by Type, Woodbury

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	1,331	2.0%	105,329	3.0%
Vision Difficulty	709	1.1%	49,528	1.4%
Cognitive Difficulty	1,417	2.3%	138,788	4.2%
Ambulatory Difficulty	1,860	3.0%	148,966	4.6%
Self-Care Difficulty	791	1.3%	65,395	2.0%
Independent Living Difficulty	1,314	2.7%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

Table 14: Disability by Type, Scott County

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	3,541	2.5%	105,329	3.0%
Vision Difficulty	1,758	1.3%	49,528	1.4%
Cognitive Difficulty	4,231	3.3%	138,788	4.2%
Ambulatory Difficulty	4,242	3.3%	148,966	4.6%
Self-Care Difficulty	2,069	1.6%	65,395	2.0%
Independent Living Difficulty	3,219	3.2%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

Table 15: Disability by Type, Carver County

	Jurisdiction		Region	
Disability Type	**#**	**%**	**#**	**%**
Hearing Difficulty	2,280	2.3%	105,329	3.0%
Vision Difficulty	865	0.9%	49,528	1.4%
Cognitive Difficulty	2,326	2.5%	138,788	4.2%
Ambulatory Difficulty	2,792	3.0%	148,966	4.6%
Self-Care Difficulty	1,258	1.4%	65,395	2.0%
Independent Living Difficulty	2,186	3.1%	116,400	4.4%

Source: American Community Survey, 2013-2017 Estimates

i. How are people with disabilities geographically dispersed or concentrated in the jurisdiction and region, including R/ECAPs and other segregated areas identified in previous sections?

Persons with disabilities in the Twin Cities region are somewhat concentrated in particular areas, and those areas disproportionately include areas with higher concentrations of Black residents than the region as a whole and R/ECAPs. Among entitlement cities, in order, Coon Rapids, St. Paul, Minneapolis, and Bloomington have relatively higher concentrations of persons with disabilities. Eden Prairie has the lowest concentration, followed by Woodbury, Plymouth, and Minnetonka. Minneapolis and St. Paul are more heavily Black than the other cities and include several R/ECAPs, but there is no clear link between the racial and ethnic composition of the other

entitlement cities, such as Coon Rapids which has the highest concentration of persons with disabilities, and residence by persons with disabilities. Neither does age explain differing concentrations, as Minnetonka has the highest concentration of elderly residents. There is some overlap between areas of concentration of persons with disabilities and areas where supportive services have historically been available; however, this overlap should have less explanatory force over time as Medicaid-funded programs shift towards an emphasis on individuals having a choice of providers and being able to receive services at home.

Among the counties, in order, Ramsey, Anoka, Hennepin, and Washington have the highest concentrations of persons of disabilities while Carver, Scott, and Dakota have the lowest. As with the cities, Ramsey and Hennepin Counties, anchored as they are by the cities of St. Paul and Minneapolis respectively, are more heavily Black than the other counties which generally have lower concentrations of persons with disabilities. However, among the more suburban and exurban counties, there does not appear to be a significant relationship between concentrations of persons with disabilities and concentrations of residents of color and Black residents, in particular. Although Carver County has both the lowest concentration of Black residents and the lowest concentration of persons with disabilities, Dakota County has the highest concentration of Black residents among those five counties and has one of the lower concentrations of persons with disabilities.

The concentration of persons with disabilities within cities and counties is not even. In Anoka County, concentrations are highest in Coon Rapids and Spring Lake Park, with concentrations in Coon Rapids highest in the southern and southwestern portions of that city. In Carver County, the concentration of persons with disabilities is highest in Watertown and Hamburg. Both communities with very low concentrations of residents of color. In Dakota County, the areas with the highest concentrations of persons with disabilities are located West St. Paul, South St. Paul, Inver Grove Heights, Hastings, and Burnsville. Burnsville has a higher Black population concentration than other suburban communities while the same is true with respect to Hispanic population concentration for the other three cities. In Hennepin County, persons with disabilities are concentrated in Minneapolis (and north Minneapolis, parts of south Minneapolis, and downtown Minneapolis, in particular), Edina, and Richfield. Edina is predominantly White while Richfield is slightly more diverse than the broader Twin Cities region and the Minneapolis neighborhoods with concentrations of persons with disabilities comprise many of the most heavily Black or Hispanic neighborhoods in the region and include multiple R/ECAPs. In Ramsey County, the areas with the highest concentrations of persons with disabilities include the areas in and around downtown St. Paul as well as much of Roseville and Maplewood. The parts of St. Paul that have concentrations of persons with disabilities have higher concentrations of Black, Hispanic, and Asian and Pacific Islander residents than the region as a whole while Roseville has a similar demographic composition to the broader region and Maplewood is somewhat more diverse. In Scott County, concentrations of persons with disabilities are highest in Savage, Shakopee, and the largely unincorporated southwestern portion of the county. Savage and Shakopee are demographically similar to the broader region as a whole while the southwestern portion of the county is predominantly White. In Washington County, concentrations of persons with disabilities are highest in Oakdale, Lake Elmo, Stillwater, and Forest Lake. Lake Elmo, Stillwater, and Forest Lake are predominantly White while Oakdale has a similar demographic composition to the broader region.

ii. Describe whether these geographic patterns vary for people with each type of disability or for people with disabilities in different age ranges for the jurisdiction and region.

With respect to persons with hearing disabilities, areas of concentration include Coon Rapids, West St. Paul, Richfield, Edina, and parts of Burnsville and Apple Valley. Persons with vision disabilities are concentrated in central and eastern St. Paul, West St. Paul, Bloomington, Edina, Richfield, and downtown, north, and south Minneapolis. Persons with cognitive disabilities are much more concentrated in the same central city portions of Minneapolis and St. Paul that have concentrations of persons with disabilities overall. Persons with ambulatory disabilities are concentrated in those same areas as well as in Richfield, Edina, and Burnsville. Persons with self-care disabilities are concentrated in north and south Minneapolis, central and eastern St. Paul, western Roseville, Coon Rapids, Richfield, and Edina. Persons with independent living disabilities are concentrated in north and south Minneapolis, central and eastern St. Paul, Richfield, Edina, New Hope, Roseville, and North St. Paul.

Children with disabilities are concentrated in north and south Minneapolis, central and eastern St. Paul, Coon Rapids, Edina, and Stillwater. Non-elderly adults with disabilities are highly concentrated in north and south Minneapolis as well as in central and eastern St. Paul. Elderly persons with disabilities are relatively evenly distributed throughout the region.

iii. Describe whether the jurisdiction and region have sufficient affordable, accessible housing in a range of unit sizes.

Overall, there is a significant shortage of affordable, accessible housing in a range of unit sizes within all of the jurisdictions included in the scope of this Assessment. In part, this is a byproduct of the overall shortage of affordable housing in the region. If there is insufficient affordable housing in general, then there is unlikely to be adequate affordable, accessible housing unless a disproportionate share of affordable housing is accessible. Given that even under the most robust accessibility mandates of Section 504 of the Rehabilitation Act only 5% of units have to be accessible to individuals with ambulatory disabilities and 2% have to be accessible to individuals with hearing or vision disabilities, that is never the case. Additionally, if developers and funding entities prioritize studios and one-bedroom apartments when creating publicly supported housing, it is unlikely that there will be sufficient accessible units for families that include persons with disability-related accessibility needs or persons with disabilities who need the services of live-in aides. With respect to the Housing Choice Voucher program, which is often the primary vehicle for large families to access affordable housing, the overall supply of multifamily housing is an important variable for accessibility, because single-family home construction is not subject to accessibility requirements.

Accessibility Requirement for Federally-Funded Housing

Section 504 of the Rehabilitation Act applies to all programs and activities that receive federal financial assistance. There is consensus that most publicly supported housing is covered under Section 504 although there is debate as to whether Low Income Housing Tax Credit (LIHTC) properties are covered. As discussed above, Section 504 applies more rigorous accessibility

requirements than exist under the Fair Housing Act to a portion of assisted units. Older publicly supported housing built prior to the passage of the Rehabilitation Act in 1973 often fails to meet the law's accessibility requirements but is subject to retrofit requirements if it undergoes substantial alteration. Additionally, unlike under the Fair Housing Act, if a tenant in housing covered by Section 504 requests a reasonable modification that is necessary to ensure equal access, the housing provider rather than the tenant must pay. This requirement provides a vehicle for some accessibility improvements.

Among programs for which HUD provides data, Public Housing, Project-Based Section 8, and Other Multifamily housing are generally covered by Section 504. As reflected in the data presented in the Publicly Supported Housing section of this Assessment, there are 12,427 public housing units in the region, many of which were constructed prior to 1973. These units are not evenly distributed across the region. The vast majority – 10,384 (83.6%) – are located in the cities of Minneapolis and St. Paul. A strong plurality of the remaining units are in Washington County. Several jurisdictions – including Anoka County, Bloomington, Eden Prairie, Minnetonka, and Ramsey County (outside of St. Paul) – have no public housing. Project-Based Section 8 housing and Other Multifamily housing are somewhat more evenly distributed. There are 14,785 units of Project-Based Section 8 of which 7,621 (51.5%) are in Minneapolis and St. Paul. Only one jurisdiction – the city of Woodbury – totally lacks Project-Based Section 8 housing. With respect to Other Multifamily housing, which primarily consists of Section 202 and Section 811 properties that are targeted at persons with disabilities, there are 1,737 units of which just 625 (36.0%) are located in Minneapolis and St. Paul. Only Eden Prairie lacks Other Multifamily units. Other Multifamily and Project-Based Section 8 units are more likely to be of post-1973 construction than are Public Housing Units.

Additionally, HUD's HOME Performance Snapshots include information reflecting the number of HOME-assisted Section 504-compliant units in a jurisdiction. The number of such units is reflected for each HOME program participant: Dakota County – 504 units;[58] Hennepin County – 170 units; Minneapolis – 370 units; and St. Paul – 107 units.

Low Income Housing Tax Credit (LIHTC) Units

As discussed above, there is no consensus as to whether LIHTC units are covered under Section 504 of the Rehabilitation Act. However, since the LIHTC program has only existed since 1986, the vast majority of LIHTC units with active subsidies were at least subject to the Fair Housing Act's design and construction standards, which went into effect in 1991, at the time that they were first occupied. There are more total LIHTC units in the Twin Cities than there are Public Housing, Project-Based Section 8, and Other Multifamily units combined (see Publicly Supported Housing section for unit breakdowns).

Housing Choice Vouchers

Because Housing Choice Vouchers generally are not tied to specific units, actual units may be subject to a variety of different accessibility standards or none whatsoever. Nonetheless, vouchers

[58] The Dakota County Home Consortium includes Dakota County, Anoka County, Ramsey County, Washington County, and the City of Woodbury.

are an important means for low-income persons with disabilities to reside in accessible housing, under the standards of the Fair Housing Act, which may not be affordable whether because it is market-rate or because it is LIHTC housing for which rents are out of reach for extremely low-income households. There are 19,837 vouchers in use in the region with 9,578 (48.3%) of those in Minneapolis and St. Paul – a similar proportion to that of Project-Based Section 8 units.

Fair Housing Amendments Act Units

As discussed above, multifamily housing build for occupancy from 1991 to the present is subject to design and construction standards under the Fair Housing Act that have the goals of increasing accessibility, regardless of whether a property is subsidized or not. Within the scope of this Assessment, it is not possible to ascertain exactly how many units covered by these requirements are in each participating jurisdiction. There are two reasons for this. First, the American Community survey combines structures with two to four units into one category, and two or three unit structures are not covered while four unit structures are. Second, the American Community Survey combines units built from 1980 through 1999 into one category although the Fair Housing Act's design and construction standards only apply to units built within 45% of that timeframe. Nonetheless, American Community Survey data can still provide a useful snapshot of the likely supply of covered housing.

Table 16: Large Structures and Years Built

	Number of Units in Structures with 5 or more Units	
Jurisdiction	Built 1980-1999	Built after 2000
Anoka County	5,284	1,238
Coon Rapids	2,001	520
Dakota County	11,748	6,634
Hennepin County	40,128	28,469
Bloomington	3,827	1,648
Eden Prairie	3,191	1,252
Minneapolis	11,161	15,202
Minnetonka	4,314	745
Plymouth	3,285	1,685
St. Paul	7,792	5,655
Ramsey County	14,443	10,013
Washington County	3,403	2,976
Woodbury	1,296	1,027
Scott County	1,389	1,885
Carver County	1,240	1,582

Source: 2014-2018 American Community Survey 5-Year Estimates

In Anoka County, there are 1,238 units in structures with five or more units built from 2000 to the present and an additional 5,284 such units built from 1980 through 1999. In Carver County, there are 1,582 units in structures with five or more units built from 2000 to the present and an additional 1,240 such units built from 1980 through 1999. In Dakota County, there are 6,634 units in

structures with five or more units built from 2000 to the present and an additional 11,748 such units built from 1980 through 1999. In Hennepin County, there are 28,469 units in structures with five or more units built from 2000 to the present and an additional 40,128 such units built from 1980 through 1999. In Ramsey County, there are 10,013 units in structures with five or more units built from 2000 to the present and an additional 14,443 such units built from 1980 through 1999. In Scott County, there are 1,885 units in structures with five or more units built from 2000 to the present and an additional 1,389 such units built from 1980 through 1999. In Washington County, there are 2,976 units in structures with five or more units built from 2000 to the present and an additional 3,403 such units built from 1980 through 1999. In Bloomington, there are 1,648 units in structures with five or more units built from 2000 to the present and an additional 3,827 such units built from 1980 through 1999. In Coon Rapids, there are 520 units in structures with five or more units built from 2000 to the present and an additional 2,001 such units built from 1980 through 1999. In Eden Prairie, there are 1,252 units in structures with five or more units built from 2000 to the present and an additional 3,191 such units built from 1980 through 1999. In Minneapolis, there are 15,202 units in structures with five or more units built from 2000 to the present and an additional 11,161 such units built from 1980 through 1999. In Minnetonka, there are 745 units in structures with five or more units built from 2000 to the present and an additional 4,314 such units built from 1980 through 1999. In Plymouth, there are 1,685 units in structures with five or more units built from 2000 to the present and an additional 3,285 such units built from 1980 through 1999. In St. Paul, there are 5,655 units in structures with five or more units built from 2000 to the present and an additional 7,792 such units built from 1980 through 1999. Lastly, in Woodbury, there are 1,027 units in structures with five or more units built from 2000 to the present and an additional 1,296 such units built from 1980 through 1999.

This data is illustrative of three key trends. First, there are more multifamily housing units in Minneapolis and St. Paul and therefore there are greater opportunities to reside in accessible housing in those jurisdictions. Second, that trend has been intensifying in recent years, with the ratio of multifamily housing units constructed from 2000 to the present to the ratio constructed from 1980 through 1999 skewed to more recent construction in Minneapolis, in particular, and St. Paul in comparison to other cities or counties. Third, the overall housing stock across jurisdictions continues to be predominantly single-family homes which may lack accessibility features.

Summary

In the Twin Cities region, there are 148,966 persons with ambulatory disabilities. Not all of these people are low-income and need affordable housing, some of these people are within the same households as others with ambulatory disabilities, and not all people with ambulatory disabilities need the types of features included in accessible units. Nonetheless, this data point reflects the substantial need for affordable, accessible housing. As the review of different sources of affordable, accessible housing above reveals, there is nowhere near close to enough supply to meet the need. The gap is especially pronounced in the suburban areas of the region outside of the core cities of Minneapolis and St. Paul. Additionally, although detailed data reflecting the distribution of bedroom sizes in the categories discussed above is not available, the types of housing discussed above disproportionately consist of studios and one-bedroom apartments, and, to the extent that multi-bedroom units are available, they tend to be two-bedroom units, leaving persons with disabilities who need units with three or more bedrooms in a bind.

iv. Describe the areas where affordable, accessible housing units are located in the jurisdiction and region. Do they align with R/ECAPs or other areas that are segregated?

As reflected in the Publicly Supported Housing section of this Assessment, affordable housing in the jurisdictions and region is heavily concentrated in particular areas including north Minneapolis, downtown Minneapolis, and south Minneapolis; central and eastern St. Paul; Richfield; the eastern portion of Bloomington; Burnsville; Brooklyn Center; Maplewood; North St. Paul; and the southern and southwestern portion of Coon Rapids. This Assessment did not reveal a difference between where affordable housing is located, in general, and where affordable, accessible housing is located, specifically. Areas with concentrations of affordable, accessible area do align with R/ECAPs and concentrated Black, Hispanic, and Asian and Pacific Islander population.

v. To what extent are people with different disabilities able to access and live in the different categories of publicly supported housing in the jurisdiction and region?

Table 17 - Occupancy of Publicly Supported Housing Program Units by People with Disabilities by Category, Anoka County

(Anoka County, MN CDBG) Jurisdiction	People with a Disability	
	#	%
Public Housing	N/a	N/a
Project-Based Section 8	221	23.02%
Other Multifamily	15	10.14%
HCV Program	358	23.22%

Source: American Community Survey, 2013-2017 Estimates; IMS/PIH (See Data Documentation for details).

Table 18 - Occupancy of Publicly Supported Housing Program Units by People with Disabilities by Category, Dakota County

(Dakota County, MN CDBG, ESG) Jurisdiction	People with a Disability	
	#	%
Public Housing	218	35.80%
Project-Based Section 8	155	14.34%
Other Multifamily	57	30.98%
HCV Program	569	22.06%

Source: American Community Survey, 2013-2017 Estimates; IMS/PIH (See Data Documentation for details).

Table 19 - Occupancy of Publicly Supported Housing Program Units by People with Disabilities by Category, Hennepin County

(Hennepin County, MN CDBG, ESG) Jurisdiction	People with a Disability	
	#	%
Public Housing	140	51.66%
Project-Based Section 8	499	19.58%
Other Multifamily	121	52.61%
HCV Program	706	21.88%

Source: American Community Survey, 2013-2017 Estimates; IMS/PIH (See Data Documentation for details).

Table 20 - Occupancy of Publicly Supported Housing Program Units by People with Disabilities by Category, Bloomington

(Bloomington, MN CDBG) Jurisdiction	People with a Disability	
	#	%
Public Housing	N/a	N/a
Project-Based Section 8	116	23.11%
Other Multifamily	46	26.90%
HCV Program	91	17.88%

Source: American Community Survey, 2013-2017 Estimates; IMS/PIH (See Data Documentation for details).

Table 21 - Occupancy of Publicly Supported Housing Program Units by People with Disabilities by Category, Minneapolis

(Minneapolis, MN CDBG, HOME, ESG) Jurisdiction	People with a Disability	
	#	%
Public Housing	3,250	54.64%
Project-Based Section 8	976	22.80%
Other Multifamily	62	22.14%
HCV Program	1,043	20.71%

Source: American Community Survey, 2013-2017 Estimates; IMS/PIH (See Data Documentation for details).

Table 22 - Occupancy of Publicly Supported Housing Program Units by People with Disabilities by Category, Minnetonka

(Minnetonka, MN CDBG) Jurisdiction	People with a Disability	
	#	%
Public Housing	N/a	N/a
Project-Based Section 8	63	27.75%
Other Multifamily	23	34.33%
HCV Program	40	24.24%

Source: American Community Survey, 2013-2017 Estimates; IMS/PIH (See Data Documentation for details).

Table 23 - Occupancy of Publicly Supported Housing Program Units by People with Disabilities by Category, Plymouth

(Plymouth, MN CDBG) Jurisdiction	People with a Disability	
	#	%
Public Housing	11	10.38%
Project-Based Section 8	9	8.74%
Other Multifamily	0	0.00%
HCV Program	109	30.19%

Source: American Community Survey, 2013-2017 Estimates; IMS/PIH (See Data Documentation for details).

Table 24 - Occupancy of Publicly Supported Housing Program Units by People with Disabilities by Category, Ramsey County

(Ramsey County, MN CDBG) Jurisdiction	People with a Disability	
	#	%
Public Housing	N/a	N/a
Project-Based Section 8	245	20.59%
Other Multifamily	58	30.21%
HCV Program	328	21.26%

Source: American Community Survey, 2013-2017 Estimates; IMS/PIH (See Data Documentation for details).

Table 25 - Occupancy of Publicly Supported Housing Program Units by People with Disabilities by Category, St. Paul

(St Paul, MN CDBG, HOME, ESG) Jurisdiction	People with a Disability	
	#	%
Public Housing	1,694	40.67%
Project-Based Section 8	638	21.72%
Other Multifamily	18	5.49%
HCV Program	1,147	26.63%

Source: American Community Survey, 2013-2017 Estimates; IMS/PIH (See Data Documentation for details).

Table 26 - Occupancy of Publicly Supported Housing Program Units by People with Disabilities by Category, Washington County

(Washington County, MN CDBG) Jurisdiction	People with a Disability	
	#	%
Public Housing	27	71.05%
Project-Based Section 8	179	19.46%
Other Multifamily	19	26.39%
HCV Program	98	27.30%

Source: American Community Survey, 2013-2017 Estimates; IMS/PIH (See Data Documentation for details).

Table 27 - Occupancy of Publicly Supported Housing Program Units by People with Disabilities by Category, Woodbury

(Woodbury City, MN CDBG, HOME) Jurisdiction	People with a Disability	
	#	%
Public Housing	5	7.94%
Project-Based Section 8	N/a	N/a
Other Multifamily	N/a	N/a
HCV Program	13	15.85%

Source: American Community Survey, 2013-2017 Estimates; IMS/PIH (See Data Documentation for details).

Across jurisdictions, the share of Housing Choice Voucher holders who have disabilities varies in a somewhat narrow range from a low of 15.85% in Woodbury to a high of 30.19% in Plymouth. St. Paul (26.63%) and Minneapolis (20.71%) are noteworthy in that they have the largest number of voucher holders overall. As 9.9% of the total civilian noninstitutionalized population of the Minneapolis-St. Paul-Bloomington, MN-WI Metropolitan Statistical Area (MSA), this means that persons with disabilities are not underrepresented in the voucher program in relation to their share of the total population across jurisdictions. However, disability status is correlated with socioeconomic status, so it is possible that persons with disabilities are slightly underrepresented in relation to their share of the income-eligible population in some communities. According to the 2018 American Community Survey 1-Year Estimates, 17.3% of persons with disabilities in the MSA have incomes below the poverty line as opposed to 8.5% of the overall population (inclusive of persons with disabilities). At the same time, it is likely that public housing authorities collecting demographic data regarding the disability status of their residents are using a more restrictive definition of disability than that used by the American Community Survey. Nonetheless, in addition to Woodbury, the jurisdiction in which persons with disabilities make up the lowest shares of voucher holders and where policy interventions to increase program accessibility may be most needed is Bloomington (17.88%).

With respect to the other programs, there are fewer clear trends due to wildly disparate amounts of each type of housing in the different jurisdiction and the complications introduced by properties serving targeted populations, such as seniors or persons with disabilities. For public housing, persons with disabilities make up a much higher share of residents than they do of the general public (and likely than they do of the income-eligible population) in Dakota County, Hennepin County, Minneapolis, St. Paul, and Washington County. Concentrations in these jurisdictions range from 35.80% (Dakota County) to 71.05% (Washington County). Plymouth (10.38%) and Woodbury (7.94%) are outliers and have very small overall supply of public housing. Still, it is concerning that persons with disabilities appear to have limited access to either form of publicly supported housing (for which data is available) in Woodbury.

In Project-Based Section 8 housing, data reflects concentrations of persons with disabilities that are more similar to the Housing Choice Voucher program, frequently falling from 19-25%, albeit with more outliers falling below that range. Specifically, Dakota County (14.34%) and Plymouth (8.74%) have significantly lower concentrations. Many Project-Based Section 8 developments are age-restricted developments for seniors, and the extent to which housing providers are accurately documenting the disability status of elderly persons with disabilities is unclear. With respect to

Other Multifamily housing, which raises many of the same issues as Project-Based Section 8, there are fewer clear trends. Anoka County (10.14%), Plymouth (0.00%), and St. Paul (5.49%) have disproportionately low concentrations of persons with disabilities residing in such housing. Although Plymouth only has a total of 45 such units, the consistency with which there is relatively limited access to hard units of publicly supported housing for persons with disabilities in that city suggests a need for targeted action.

Integration of People with Disabilities Living in Institutions and Other Segregated Settings

vi. To what extent do people with disabilities in or from the jurisdiction or region reside in segregated or integrated settings?

Up until a wave of policy reforms and court decisions in the 1960s and 1970s, states, including Minnesota, primarily housed people with intellectual and developmental disabilities and individuals with psychiatric disabilities in large state-run institutions. In Minnesota, state hospitals and regional training centers for persons with developmental disabilities have been closed. Within these institutions, people with disabilities had few opportunities for meaningful interaction with individuals without disabilities, limited access to education and employment, and a lack of individual autonomy. The transition away from housing people with disabilities in institutional settings and toward providing housing and services in home and community-based settings accelerated with the passage of the Americans with Disabilities Act in 1991 and the U.S. Supreme Court's landmark decision in *Olmstead v. L.C.* in 1999. In *Olmstead*, the Supreme Court held that, under the regulations of the U.S. Department of Justice (DOJ) implementing Title II of the Americans with Disabilities Act (ADA), if a state or local government provides supportive services to people with disabilities, it must do so in the most integrated setting appropriate to the needs of a person with a disability and consistent with their informed choice. This obligation is not absolute and is subject to the ADA defense that providing services in a more integrated setting would constitute a fundamental alteration of the state or local government's programs.

The transition from widespread institutionalization to community integration has not always been linear, and concepts of what comprises a home and community-based setting have evolved over time. Although it is clear that training centers and state hospitals are segregated settings and that an individual's own house or apartment in a development where the vast majority of residents are individuals without disabilities is an integrated setting, significant ambiguities remain. Nursing homes and intermediate care facilities are clearly segregated though not to the same degree as state institutions. Group homes fall somewhere between truly integrated supported housing and such segregated settings, and the degree of integration present in group homes often corresponds to their size.

Below, this assessment includes detailed information about the degree to which people with intellectual and developmental disabilities and individuals with psychiatric disabilities reside in integrated or segregated settings. The selection of these two areas of focus does not mean that people with other types of disabilities are never subject to segregation, and data reflecting nursing home residents is helpful for providing that context. In Minnesota, state and county agencies, rather than cities, are largely responsible for coordinating the delivery of supportive services primarily to individuals with disabilities.

vii. Describe the range of options for people with disabilities to access affordable housing and supportive services in the jurisdiction and region.

Table 28: Waivers and Targeted Populations

Waiver Name	Population Supported
Alternative Care Waiver	Elderly individuals at risk of nursing home placement
Brain Injury Waiver	Individuals with acquired or traumatic brain injuries who need care provided in specialized nursing facilities
Community Alternative Care Waiver	Chronically ill and medically fragile people who require a hospital level of care
Community Access for Disability Inclusion Waiver	Persons with disabilities who require a nursing home level of care
Developmental Disabilities Waiver	Persons with developmental disabilities who require the level of care provided in an Intermediate Care Facility for Persons with Developmental Disabilities
Elderly Waiver	Elderly individuals who require a nursing home level of care

With respect to supportive services, the Minnesota Department of Human Services operates six different home and community-based services waivers. The Alternative Care Waiver supports services for elderly individuals who are at risk of nursing home placement. The Brain Injury Waiver supports services for individuals with acquired or traumatic brain injuries who need the level of care provided in specialized nursing facilities. The Community Alternative Care Waiver supports chronically ill and medically fragile people who require a hospital level of care. The Community Access for Disability Inclusion Waiver supports persons with disabilities who require a nursing home level of care. The Developmental Disabilities Waiver supports persons with developmental disabilities who require the level of care provided in an Intermediate Care Facility for Persons with Developmental Disabilities. The Elderly Waiver supports elderly individuals who require a nursing home level of care. When viewed holistically, these programs provide the services and supports necessary to sustain integrated, community-based living for people with a broad spectrum of disabilities. Most of these waivers are available to qualified individuals upon application; however, the Developmental Disabilities Waiver has a waiting list, and the State is not successfully able to move most individuals (53%) off the waiting list at what it deems a reasonable pace of within 45 days.[59] Additionally, not all individuals were approved for funding within the calendar year of 2016, with 24% of individuals assessed remaining on the waiting list at the end of the year. Although waiver services can and do effectively support individuals with disabilities living in the community, rules regarding covered services and provider reimbursement

[59] https://www.dhs.state.mn.us/main/idcplg?IdcService=GET_FILE&RevisionSelectionMethod=LatestReleased&Rendition=Primary&allowInterrupt=1&noSaveAs=1&dDocName=dhs-320068

rates can influence the efficacy of waivers. For example, inadequate rates can inadvertently incentivize group homes settings over independent living because of economies of scale and can result in low pay for staff, which, in turn, can increase turnover and decrease quality of care. A Department of Human Services report based on 2019 data found that 92% of direct support professionals in the waiver system earned less than $15 per hour and that annual turnover for direct support professionals was 48%.[60]

With respect to housing, the Minnesota Supplemental Aid Housing Assistance program provides rental assistance to persons with disabilities, including people transitioning from institutions or receiving waiver services, who are paying more than 40% of their income in rent. Bridges, which is administered by Minnesota Housing, is another rental assistance program. It targets very low-income households that include a members with a serious mental illness. Minnesota Housing also supports the development of permanent supportive housing, including through the federal Section 811 program, which currently assists 124 households in the state. Additionally, housing authorities within the region including the Metro Council, which has a preference for individuals moving from site based permanent supportive housing, and the St. Paul Housing Authority, which sets aside Mainstream Vouchers for non-elderly persons with disabilities.

Disparities in Access to Opportunity

To what extent are people with disabilities able to access the following in the jurisdiction and region? Identify major barriers faced concerning:

i. Government services and facilities

Please see the discussion for *Inaccessible Government Facilities and Services* in the Contributing Factors Appendix.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Please see the discussion for *Inaccessible Public of Private Infrastructure* in the Contributing Factors Appendix.

iii. Transportation

Please see the discussion for *Access to Transportation for Persons with Disabilities* in the Contributing Factors Appendix.

iv. Proficient schools and educational programs

Please see the discussion for *Access for Persons with Disabilities to Proficient Schools* in the Contributing Factors Appendix.

v. Jobs

[60] https://edocs.dhs.state.mn.us/lfserver/Public/DHS-8003-ENG

According to the State of Minnesota's Olmstead Plan, updated in March 2020, unemployment and poverty continue to be significant issues for persons with disabilities in the state. 49% of Minnesotans ages 21 to 64 who have disabilities are employed as opposed to 85.7% of the general population in that age range. The Olmstead Plan sets forth goals for increasing the number of individuals who are in competitive integrated employment among people receiving Vocational Rehabilitation Services and State Services for the Blind, among people receiving Medicaid-funded services, and among students with developmental disabilities. The plan also proposes increases in the number of Peer Support Specialists employed by mental health service providers.

Describe the processes that exist in the jurisdiction and region for people with disabilities to request and obtain reasonable accommodations and accessibility modifications to address the barriers discussed above.

i. Government services and facilities

Government websites generally do not have accessibility information on their homepages, and there is not clear, public information regarding how individuals can request accommodations. For example, the website for the City of St. Paul includes accessibility information on a page titled Website Policies rather than on a page called Accessibility. Hennepin County does not have such a page at all.

ii. Public infrastructure (e.g., sidewalks, pedestrian crossings, pedestrian signals)

Most jurisdictions do not provide clear, public information regarding how individuals with disabilities can request accommodations relating to public infrastructure. Hennepin County has a generalized ADA Grievance form that could be used to request infrastructure-related accommodations.

iii. Transportation

By contrast, the Metropolitan Council and MetroTransit have clear, easily findable information about their accommodation and modification policies.

iv. Proficient schools and educational programs

School districts are more disparate in how they display information relating to their accommodation policies, with some making that information easy to find but others not.

v. Jobs

This Analysis did not reveal information suggesting patterns in how major employers do or do not provide required accommodations in the Twin Cities region.

Describe any difficulties in achieving homeownership experienced by people with disabilities and by people with different types of disabilities in the jurisdiction and region.

Persons with disabilities in the Twin Cities region are less able to access homeownership than individuals who do not have disabilities, primarily because of the high cost of homeownership and relative differences in income between persons with disabilities and individuals who do not have disabilities. This pattern is slightly undercut by the prevalence of elderly homeowners with disabilities that began in old age. Many of these individuals earned relatively high incomes prior to the onset of their disabilities.

Disproportionate Housing Needs

Describe any disproportionate housing needs experienced by people with disabilities and by people with certain types of disabilities in the jurisdiction and region.

Table 29: Household Problems by Disability Status

Place	Households with a member with a disability, with at least one of four housing problems	Households with a member with a disability	Percent of households with a member with a disability, with at least one of four housing problems
Coon Rapids	1,965	5,425	36.22%
Anoka County, Minnesota	9,130	26,090	34.99%
Carver County, Minnesota	1,750	5,465	32.02%
Dakota County, Minnesota	10,660	29,235	36.46%
Bloomington	2,590	7,715	33.57%
Eden Prairie	1,250	3,485	35.87%
Minneapolis	16,870	33,340	50.60%
Minnetonka	1,600	3,935	40.66%
Plymouth	1,540	4,420	34.84%
Hennepin County, Minnesota	40,895	92,740	44.10%
St. Paul	13,230	26,915	49.15%
Ramsey County, Minnesota	21,675	47,910	45.24%
Scott County, Minnesota	2,565	7,615	33.68%

Woodbury	1,135	3,405	33.33%
Washington County, Minnesota	5,575	17,180	32.45%

Source: Community Housing Affordability Strategy (CHAS) Data, 2012-2016.

Data reflecting disproportionate housing needs for persons with disabilities in the region is not available; however, in light of the lower income levels of persons with disabilities and the at times low rates at which they are able to access publicly supported housing programs as discussed above, it is almost certain that persons with disabilities experience housing problems, in general, and cost burden, in particular, at high rates.

Additional Information

Beyond the HUD-provided data, provide additional relevant information, if any, about disability and access issues in the jurisdiction and region including those affecting people with disabilities with other protected characteristics.

This Assessment has made extensive use of local data throughout the Disability and Access section. The sources of data other than HUD-provided data are noted where appropriate.

The program participant may also describe other information relevant to its assessment of disability and access issues.

The discussion above provides a comprehensive overview of information relevant to this Assessment.

Disability and Access Issues Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the severity of disability and access issues and the fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each contributing factor, note which fair housing issue(s) the selected contributing factor relates to.

- Access for persons with disabilities to proficient schools
- Access to publicly supported housing for persons with disabilities
- Access to transportation for persons with disabilities
- Inaccessible government facilities or services
- Inaccessible public or private infrastructure
- Lack of access to opportunity due to high housing costs
- Lack of affordable in-home or community-based supportive services
- Lack of affordable, accessible housing in range of unit sizes
- Lack of affordable, integrated housing for individuals who need supportive services
- Lack of assistance for housing accessibility modifications
- Lack of assistance for transitioning from institutional settings to integrated housing

- Lack of local or regional cooperation
- Land use and zoning laws
- Lending discrimination
- Location of accessible housing
- Loss of affordable housing
- Occupancy codes and restrictions
- Regulatory barriers to providing housing and supportive services for persons with disabilities
- Source of income discrimination
- State or local laws, policies, or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing and other integrated settings

E. Fair Housing Enforcement, Outreach Capacity and Resources

i. List and summarize any of the following that have not been resolved:

- A charge or letter of finding from HUD concerning a violation of a civil rights-related law;
- A cause determination from a substantially equivalent state or local fair housing agency concerning a violation of a state or local fair housing law;
- Any voluntary compliance agreements, conciliation agreements, or settlement agreements entered into with HUD or the Department of Justice.
  - The Cities of Minneapolis and Saint Paul entered into voluntary compliance agreements with HUD and the Metropolitan Interfaith Council on Affordable Housing (MICAH) to settle two fair housing complaints filed by MICAH and several neighborhood/community groups in the two cities. The complaints alleged that Minneapolis and St. Paul had discriminated on the basis of race, color, and national origin in their administration of the Community Development Block Grant and HOME fund programs. The complaints also alleged that the cities were not complying with their duties to affirmatively further fair housing. As part of the compliance agreement, the Cities agreed to revise the 2014 Regional Analysis of Impediments through the use of an appointed and diverse Fair Housing Advisory Committee and an addendum that was to address the concentration of affordable housing, the effect of zoning and other housing policies reinforced segregation in the region, as well as provide funds to MICAH for fair housing work.

- A letter of findings issued by or lawsuit filed or joined by the Department of Justice alleging a pattern or practice or systemic violation of a fair housing or civil rights law;
  - (2015) The City of St. Anthony Village, Minnesota, located in both Hennepin and Ramsey Counties (both entitlement jurisdictions), entered into a consent decree to resolve a complaint filed by the U.S. Department of Justice under the Religious Land Use and Institutionalized Persons Act. In the original complaint, DOJ alleged that the City Council unlawfully placed a burden that they would not have otherwise applied to a secular applicant. Following approval from the city planning staff and Planning Commission, the City Council denied a conditional use permit to the Abu-Huraira Islamic Center to open a prayer space for religious assembly, despite the fact that the space was already zoned "Light Industrial" and permitted assemblies as conditional uses. The consent order directs the city to pay $200,000 in damages to AHIC as well as ongoing reporting on additional education and training efforts.
  - (2019) The Minnesota ACLU has sued the Anoka-Hennepin School District for alleged discrimination against a transgender student. The student had been on the boys' swim team for months and was using the locker room without issue until he was singled out and forced to use segregated facilities The suit alleges that by denying the student access to the locker room that corresponds with his gender identity, the school district violated the state due process and equal protection clauses, as well as the Minnesota Human Rights Act. The District filed a motion to dismiss, but it was denied and the suit will continue. The Minnesota Department of Human Rights has also joined the lawsuit.
  - (2011-2015) Until last year, the Anoka-Hennepin School District was under a consent decree to resolve a complaint filed by 6 students alleging that they were being harassed at school by other students for failing to conform with gender stereotypes. The decree

required the District to hire experts in to review policies and speak with students who have experienced harassment, hire a Title IX Coordinator, provide avenues for students to provide input on policies around harassment, and improve training of staff and students.

- A claim under the False Claims Act related to fair housing, nondiscrimination, or civil rights generally, including an alleged failure to affirmatively further fair housing;
  - Several for-profit housing developers of affordable rental housing sued the City of Minneapolis in 2015, alleging that the City was falsely reporting compliance with the Affirmatively Furthering Fair Housing rule, and using more stringent rental and licensing standards that had a disparate impact on housing availability for those with protected class status. The City filed a motion for judgement on the pleadings, which was granted in part, and denied in part given the pending decisions about the cognizability of disparate impact in Fair Housing Act claims. Ultimately, the 8th Circuit held that the plaintiffs did not satisfy their burden in pleading a prima facie case of disparate impact.

- Pending administrative complaints or lawsuits against the locality alleging fair housing violations or discrimination.

ii. Describe any state or local fair housing laws. What characteristics are protected under each law?

Minnesota Human Rights Act

The Minnesota Human Rights Act is a broad anti-discrimination law that covers everything from public services to housing and credit discrimination. Related to housing, the law prohibits refusing to rent, sell, or lease property, alter the terms or conditions of rental, sale, or leasing, or publish advertisements related to the rental, sale, or leasing of property that discriminates on the basis of "race, color, creed, religion, national origin, sex, marital status, status with regard to public assistance, disability, sexual orientation, or familial status."[61] Discrimination in the conditions of financial assistance and other services provided by financial institutions is also prohibited.[62] Refusing to provide reasonable accommodations to persons with disabilities in the context of real property is also prohibited.

Minneapolis Civil Rights Ordinance

The Minneapolis City Civil Rights Ordinance broadly prohibits discrimination based on a number of protected classes: age, ancestry, color, creed, disability, emancipated minor status, familial status, gender identity, marital status, national origin, race, religion, retaliation, sex, sexual orientation, and status with regard to public assistance. Specifically related to housing, it is prohibited to refuse to rent, sell or let, alter the terms or conditions of a rental, sale, or lease, or discriminatorily advertise due to the aforementioned protected classes. It is also prohibited to fail to provide reasonable accommodations in housing to persons with disabilities. For multifamily dwellings with more than four units are also required to ensure that all public areas, kitchens, bathrooms, entrances, and exits are accessible to those who use a wheelchair, and that bathroom walls are reinforced for potential installation of grab bars. Minneapolis' ordinance also prohibits

[61] MN Human Rights Act §363A.09 (1)-(3).
[62] MN Human Rights Act §363A.09, Subd.3.(1)-(3).

lenders from discriminating against applicants for financial assistance, and prohibits discriminating on those who want to rent or buy property in certain areas of the city.

Minneapolis Tenant Screening Ordinance

The City of Minneapolis passed a tenant screening ordinance in 2019. The ordinance prohibits landlords from denying applications based on misdemeanors older than three years, felonies older than seven years, and past evictions. There are some exceptions for those with a history of manufacturing drugs and violent convictions within the last 10 years. It is also prohibited for landlords to deny applications on the basis of insufficient credit history, and places a cap on security deposits.[63]

Minnetonka City Code

The City of Minnetonka's City Code states that "city officers and employees will use all city powers to protect citizens from discriminatory practices in the city based on race, color, creed, religion, ancestry, national origin or gender[,]" but does not explicitly or actively prohibit discrimination.[64]

St. Paul Code of Ordinances

The City of St. Paul's Code of Ordinances prohibits various acts of discrimination in real property transactions on the basis of race, creed, religion, color, sex, sexual or affectional orientation, national origin, ancestry, familial status, age, disability, marital status, or public assistance status. It is prohibited to refuse to rent, sell or let, alter the terms or conditions of a rental, sale, or lease, or discriminatorily advertise due to the aforementioned protected classes. It is also prohibited to fail to provide reasonable accommodations in housing to persons with disabilities. St. Paul also prohibits refusing to allow or provide reasonable accommodations and the use of service animals for persons with disabilities, as well as coercion, intimidation, or threatening behavior that interferes with a member of a protected class from the exercise or enjoyment of their home.[65]

iii. Identify any local and regional agencies and organizations that provide fair housing information, outreach, and enforcement, including their capacity and the resources available to them.

Minnesota Attorney General's Office

MN Attorney General Keith Ellison has been in office for less than a year. He and his staff are still ironing out their main priorities, but in meeting with Deputy Attorney General Jon Keller and staff from the Consumer Protection Unit, it is clear that housing will be one of those priorities. Particularly, they plan to focus on enforcement related to manufactured housing. To date, they have submitted some letters of support in a few cases, and have expanded their daily intake line to include housing calls. Previously, all housing related complaints were referred out, but they are now dealt with in house, from intake to demand letters and conciliation. Of the complaints received daily, 2-3% are housing related. The office also represents the Department of Human Rights on

[63] http://www.startribune.com/minneapolis-council-passes-limits-on-tenant-screening-by-landlords/560246252/
[64] Minnetonka City Code, §12.10.
[65] St. Paul Code of Ordinances, §183.061

housing issues. The entire staff is comprised of 300 people. The Consumer Protection Division, which deals with housing issues, has about two dozen attorneys.

Minnesota Department of Human Rights

The MN Department of Human Rights is the statewide investigative and enforcement body for civil rights complaints. From 2012-2018, the Department investigated 2700 complaints, averaging 290 days to complete an investigation.[66] In addition to receiving and investigating complaints, the Department also issues compliance certificate to ensure that businesses operating under state contracts comply with equal opportunity requirements. The Department engages in education and outreach efforts as well, including "Know Your Rights" events throughout the state and an annual Human Rights Symposium. Finally, the Department is a member of the Olmstead Subcabinet, established by Governor Mark Dayton in 2015 with the mission to "develop and implement a comprehensive plan supporting freedom of choice and opportunity for people with disabilities."[67] The Department's website is available in English, Spanish, Somali, and Hmong.

St. Paul Department of Human Rights and Equal Opportunity

The Human Rights Division of the St. Paul Department of Human Rights and Equal Opportunity is a neutral, fact-finding agency responsible for investigating discrimination complaints related to housing, employment, etc. on the basis of race, color, religion, creed, age, disability, marital status, familial status, sex, sexual orientation, national origin, ancestry, and public assistance status. The agency investigates charges filed by complainants, allows the respondent to submit a response, conducts management and witness interviews, and will ultimately issue a probable cause determination. A 2017 audit of the Division by the Human Rights and Equal Opportunity Commission showed inconsistent caseloads across investigators and a decrease in the total number of staff investigators since the creation of the department.[68] Additionally, while the audit found that caseload of the Division has decreased significantly over the last 10 years, the length of time between case assignment and disposition has increased significantly.[69] Relevant recommendations include additional outreach to ensure city residents are aware of the Division's services and Deputy Director review of cases at the 180-day mark to ensure swift disposition.[70]

Southern Minnesota Regional Legal Services (SMRLS)

SMRLS is the oldest legal services provider in the state, and provides low-income legal services to eligible clients across Southern Minnesota. Their service area includes all of the counties in the Region besides Hennepin County—serviced by Mid-Minnesota Legal Aid. The service area also extends to the Southern border of the state. In 2018, SMRLS helped 23, 902 clients. 45% of the

[66] https://mn.gov/mdhr/assets/MDHR_2016-2017_BienniumReport_opt_tcm1061-328747.pdf

[67] https://www.dhs.state.mn.us/main/idcplg?IdcService=GET_DYNAMIC_CONVERSION&RevisionSelectionMethod=LatestReleased&dDocName=opc_about

[68] Human Rights and Equal Opportunity Commission, *Findings Report: A report from the HREEO Commission's Audit of the HREEO Human Rights Division* (2017). https://www.stpaul.gov/sites/default/files/Media%20Root/Human%20Rights%20%26%20Equal%20Economic%20Opportunity/HREEO%20Findings%20Report_0.pdf

[69] Id.

[70] Id.

9,051 cases in 2018 related to "ensuring access to safe, affordable housing."[71] SMRLS has 50 staff attorneys across Southern Minnesota, though the St. Paul Office remains understaffed for the volume of complaints they receive. In addition to staff attorneys, SMRLS has a network of over 200 volunteer attorneys. These volunteers participate in the various clinics SMRLS operates including an Uncontested Divorce Clinic, Wills Clinics, Eviction Expungement Clinics, Criminal Record Expungement Clinics, Walk-In Advice Clinics, and the Ramsey County Housing Court Clinic. The vast majority of SMRLS' resources comes from grants and contracts, followed by "other support" and in-kind contributions.

Mid-Minnesota Legal Aid

Mid-Minnesota Legal Aid is the Region's Legal Services Advisory Committee (LSAC) funded legal services provider. The organization's service area includes 20 counties, but it is the primary legal services provider serving Anoka and Hennepin County. In addition to a Housing Unit, the office also houses a Poverty Law practice, the Minnesota Disability Law Center, and the Legal Services Advocacy Project, which focuses on legislative advocacy. In 2018, Mid-Minnesota Legal Aid closed 10,651 cases, 28.5% were classified as "preventing homelessness." Regarding housing, the organization does a large amount of eviction and disability/reasonable accommodation work. Cases closed by the Minneapolis office comprised 40.9% of all closed cases in 2018. Staff at Mid-Minnesota is comprised of 69 attorneys that speak over 17 different languages. The majority of their funding comes from state and federal funds, followed by the Fund for Legal Aid, and LSAC.

Housing Justice Center

The Housing Justice Center is an LSAC-funded legal and policy advocacy organization. The organization uses legal advocacy and impact litigation to enforce local and federal fair housing laws, ensure fair allocation of fair housing resources, and fight against NIMBY sentiment that prevents affordable housing development. Housing Justice Center also engages in policy advocacy individually and as part of regional coalition groups, and conducts research and education to broaden the housing conversation in an accessible way.

Metropolitan Interfaith Council on Affordable Housing (MICAH)

MICAH is a faith-based coalition organization working around homelessness and affordable housing in the region. The coalition works to empower community members, provide outreach and awareness around housing issues in the Region, and does a substantial amount of local and state legislative advocacy concerning fair housing and affordable housing. MICAH also filed a lawsuit challenging Minneapolis and St. Paul's distribution of affordable housing, sparking an overhaul of the last AI process and the creation of the Fair Housing Advisory Committee.

Homeline MN

Homeline MN is a statewide tenant advocacy organization whose work centers mainly on the operation of a tenant telephone and email hotline. Any renter in the state can contact the hotline for 100% free and confidential legal consultation. The hotline is language specific, offering advice in English, Spanish, Somali, and Hmong. The advisors are fair housing attorneys and tenant advocates. The hotline receives a minimum of 1000 household calls a month, and served between 14,000 and 15,000 households last year, while on track to service even more in 2019. Homeline

[71] Southern Minnesota Regional Legal Services, 2018 Annual Report, http://www.smrls.org/files/9615/6944/5602/2018_Annual_Report.pdf

serves the entire state, but roughly 75% of their calls come from households in the 7-county Metro Region. Homeline also conducts outreach and education for both tenants and landlords on fair housing issues, and engages in very limited legal representation. Most often they refer to Legal Aid organizations, but the organization did participate in a Minnesota Supreme Court Case having to deal with landlord retaliation. Homeline receives CDBG funds from both Hennepin and Ramsey Counties.

Inquilinxs Unidxs (IX)

IX is a tenant organizing organization operating mainly in Minneapolis. IX helps tenants push back against rent increases, poor maintenance, and gentrification. The organization works deeply in Latinx and undocumented Latinx communities across the city, often working to organize tenants building by building to increase power and create change. IX services include education, organizing, sending letters to landlords and assisting in housing court, and using direct action, such as protests, to hold leaders accountable. IX was a member of the Fair Housing Advisory Committee during the last AI process.

Additional Information

iv. Provide additional relevant information, if any, about fair housing enforcement, outreach capacity, and resources in the jurisdiction and region.

Fair Housing Enforcement, Outreach Capacity, and Resources Contributing Factors

Consider the listed factors and any other factors affecting the jurisdiction and region. Identify factors that significantly create, contribute to, perpetuate, or increase the lack of fair housing enforcement, outreach capacity, and resources and the severity of fair housing issues, which are Segregation, R/ECAPs, Disparities in Access to Opportunity, and Disproportionate Housing Needs. For each significant contributing factor, note which fair housing issue(s) the selected contributing factor impacts.

- Lack of local private fair housing outreach and enforcement
- Lack of resources for fair housing agencies and organizations
- Lack of state or local fair housing laws

VI. Fair Housing Goals and Priorities[72]

Goal 1: Increase the supply of affordable housing in high opportunity areas.

The Twin Cities region has a severe shortage of affordable housing, particularly in areas of high opportunity. Jurisdictions continually fall short of meeting affordable housing production goals. In addition, the increasing and rapid gentrification of areas that were previously affordable has resulted in the loss of affordable housing throughout the Region, and particularly in Minneapolis, St. Paul, and the immediate suburbs. Jurisdictions should take steps to find additional and stable sources of funding for new affordable housing development, require additional affordable units in new mixed-income and mixed-use development, revise land use and zoning codes to allow for a range of types of affordable housing, and facilitate the acquisition of existing unsafe or dilapidated housing for rehabilitation.

- Change existing land use and zoning laws, where possible, to allow for more types of affordable housing, such as Accessory Dwelling Units (ADUs), Single Room Occupancy (SRO) multi-family projects, or other low cost models such as tiny homes.
- Provide additional investments in the Affordable Housing Trust Funds in St. Paul and Minneapolis and additional investments in affordable housing in the other jurisdictions.
- Provide funding to assist community organizations in purchasing, rehabilitating, and leasing dilapidated rental properties. Ensure that these organizations have the right of first refusal to purchase prior to outside, for-profit developers.
- Condition the distribution of grant funds to jurisdictions by the Metropolitan Council based communities providing concrete plans to meet their fair share of the decennial affordable housing needs.
- Expand bonus point offerings in RFPs to incentivize the development of large units with three or more bedrooms.

Goal 2: Preserve the existing stock of affordable rental housing.

Existing affordable housing in the Twin Cities region is in an extremely vulnerable state, due to both the lack of maintenance and attractiveness of these properties to outside investors. In addition to meeting demand by building new affordable housing, jurisdictions should work to maintain the existing stock of affordable housing by limiting the purchase of affordable housing to outside investors, creating protections for manufactured home communities, and ensuring regular inspection and repair of affordable housing units.

- Partner with the Minnesota Attorney General's office to develop land lease and other protections for residents of manufactured home communities.
- Provide restrictions on the "flipping" of affordable rental housing by outside investors. Require that 1) a large percentage of units remain affordable at deeper levels of affordability; 2) previous tenants have rights of return; and 3) displaced tenants have access to relocation services.

[72] Some goals may require state authorizing legislation in order to adopt and implement.

- Rehabilitate and maintain the existing stock of publicly owned, affordable single-family homes. Provide regular inspection and maintenance of these properties.
- Provide Advanced Notice of Sale and Tenant Opportunity to Purchase/first right of refusal for tenants of affordable housing units that are for sale.

Goal 3: Support homeownership for households of color.

Minnesota has extremely high homeownership rates, which an important wealth-building tool for many families, yet homeownership remains unattainable for many households of color. In addition to lending discrimination that prevents these families from purchasing homes, many down payment assistance programs will not provide enough subsidy to for homeownership to be affordable. Furthermore, many households need assistance with the long-term costs of homeownership, like necessary major repairs. Jurisdictions should hold credit and lending institutions accountable for fair lending practices and increase the amount and type of funding sources available to families of color looking to transition to homeownership.

- Develop partnership with local lending institutions to conduct homebuyer and financial literacy education targeted at communities of color.
- Develop a program or policy to provide for regular review of local lending practices for fair housing issues.
- Increase funding for down payment assistance programs.
- Fund and facilitate credit counseling and improvement programs targeted at communities of color.
- Provide more opportunities for families on public assistance to transition to ownership.
- Provide long-term support for communities of color beyond down payment assistance, such as additional funding programs for necessary repairs.

Goal 4: Prevent Displacement of Black and Brown low- and moderate-income residents.

Historically, Black and Brown communities are experiencing most vulnerable to gentrification and displacement in the Twin Cities region. In addition to providing tenant protections to reduce eviction rates, jurisdictions should thoroughly study the effects new development, particularly transit-oriented development, on communities of color and ensure that any plan for new development includes steps to reduce displacement.

- Pilot a Right to Counsel Program to provide pro bono counsel to tenants facing eviction.
- Pass localized Just Cause Eviction protections and advocate for statewide Just Cause eviction legislation.
- Advocate for statewide rent control/stabilization legislation.
- Consider the impact of transit-oriented development and preserve additional units in mixed income developments along transit corridors
- Establish a minimum nonpayment of rent threshold for evictions of $100 and adopt a rule which allows tenants to cure by paying the full amount owed up to and including the date of trial for the eviction.
- Establish a policy for regular community participation in advance of approving new development in areas populated by low- and moderate-income Black and Brown residents.

To ensure maximum participation, these meetings should be held at a variety of times be accessible via public transportation, be in locations that are ADA accessible, and provide food and perhaps childcare, if the meeting occurs in the evening.

- Establish policies that provide for analysis of potential fair housing impacts of new development in areas populated by low- and moderate income Black and Brown residents.
- Conduct or contract for regular research on gentrification and displacement throughout the region.
- Provide funding for rent relief programs, foreclosure prevention programs, and small business support in distressed areas.
- Establish use of the Equitable Development Scorecard to evaluate all new residential and mixed-use development proposals.

Goal 5: Increase community integration for person with disabilities.

Individuals with disabilities in the Twin Cities region are often limited in their choice of location and quality of housing. Many landlords do not accept vouchers or make reasonable accommodations, and there may be few or expensive transportation options in areas of higher opportunity. As a result, residents with disabilities have fewer housing options and are often relegated to areas of low opportunity. Jurisdictions should take steps to ensure that vouchers are accepted throughout the Region, that there are funds available to retrofit units for accessibility, and that there are is an extensive transportation network so that persons with disabilities can have access to safe and affordable housing, jobs, and support services.

- Increase the supply of integrated permanent supportive housing by utilizing Project-Based Vouchers in developments that include units that have rents that are within Housing Choice Voucher payment standards as a result of inclusionary zoning programs. Require a set-aside of permanent supportive housing units through requests for proposals and notices of funding availability under the HOME Investment Partnerships programs as well as under locally-funded affordable housing programs.
- Advocate for greater funding from the Minnesota Legislature for the Developmental Disabilities Waiver in order to eliminate the need for a wait list for services under that program.
- Ensure consistency in disability-related Housing Choice Voucher preferences across housing authorities.
- Deepen enhanced accessibility requirements for developments receiving federal financial assistance to require that 10% of units be accessible to persons with ambulatory disabilities and that 4% of units be accessible to persons with sensory disabilities.
- Increase funding and availability of Metro Mobility services.
- Encourage Metro Transit to subsidize rides of caregivers assisting riders with disabilities.
- Explore the creation of more affordable transportation options, especially outside of Minneapolis and St. Paul.
- Ensure that bus stops and curb cuts are plowed and/or shoveled after snowfall.
- Increase regional cooperation among disability service providers.
- Provide additional funding to disability support service organization to ensure recruitment and retention of qualified support staff.

- Create and invest in a relief fund for landlords and tenants to apply for rehabilitation assistance related to the cost of requested reasonable accommodations.

Goal 6: Ensure equal access to housing for person with protected characteristics, lower-income, and homeless.

This analysis found segregation of and discrimination against persons with protected classes, low-income families, and people experiencing homelessness. There are numerous steps jurisdictions can take to ensure equal treatment. The jurisdictions should pass protections that eliminate or drastically reduce the use of criminal backgrounds, credit scores, and past rental history in the consideration of rental applications, and conduct regular fair housing testing throughout the Region. A common application should be created and made available in a range of languages to ease the cost and burden of the affordable housing application process. Jurisdictions should create additional permanent housing options for homeless families. In addition, jurisdictions should thoroughly examine the language and enforcement of any nuisance ordinances that may have a disparate impact on Black and Latinx communities, survivors of domestic violence, and victims of crime. Given that Black and Latinx people are more likely to be stopped, cited, arrested, charged, and convicted of crimes due to racial profiling and over-policing of these communities, ordinances that allow for eviction based on calls for emergency police service or lease addendums that automatically allow for eviction based on criminal activity will disproportionately subject these communities to eviction and all of the collateral consequences that follow. Likewise, victims of crime and particularly survivors of domestic violence should not be penalized with losing their housing simply for calling for police or medical assistance. The city of St. Louis Park recently repealed their crime-free ordinance, and we urge other jurisdictions with similar policies to follow suit.

- Implement source of income protections throughout the Region and advocate for statewide protections.
- Eliminate participation in the Crime Free Multi-Housing program by local police departments.
- For municipalities with crime-free housing and nuisance ordinances that allow for eviction based on calls for service or criminal activity of tenants, condition funding on the repeal of these ordinances and advocate for statewide legislation banning these ordinances. This legislation should explicitly prohibit eviction based solely on calls for emergency service, particularly for survivors of domestic violence, victims of crime, and those experiencing health emergencies.
- Require that all rental and homeownership applications be made available in Spanish, Hmong, and Somali, and ensure that paper copies are available for those without computer access.
- Ensure that housing authorities have translation services available to their customers.
- Encourage landlords to follow HUD's guidance on the use of criminal backgrounds in screening tenants.
- The St. Paul Housing Authority should eliminate the use of a policy that allows for termination without proof beyond a reasonable doubt or a report to law enforcement.
- Following Minneapolis's example, introduce and pass legislation that requires inclusive credit screening practices that do not rely on FICO scores.

- Increase the capacity of existing fair housing enforcement agencies by providing additional funding for staff.
- Provide additional funding to increase capacity and frequency of record expungement clinics.
- Following Minneapolis's example, transition from exclusively complaint-based code-enforcement services. Provide for regular code enforcement review of all rental properties as part of rental licensing restrictions.
- Ensure that school redistricting policies do not create new or exacerbate existing segregation patterns for communities of color.
- Establish a permanent Fair Housing Advisory Committee that will participate regularly in FHIC meetings. This committee should be made up of a diverse group of community members.
- Work with the courts to ensure that they refrain from publishing evictions immediately when filed. Courts should wait to publish evictions on a tenant's record until after a judgement has been entered.
- Work with the courts to prevent evictions from remaining on a tenant's record when the eviction has been dismissed, and reduce the amount of time evictions remain on a tenant's record from 7 years to 2 years.
- Explore capping the amount of application fees private landlords may charge and the creation of a universal rental application to reduce the difficulty of applying and the amount of fees landlords are able to charge
- Restrict the ability of landlords to evict tenants during the winter months.
- Expand services and resources for homeless families.
- Partner with community based fair housing organizations to conduct regular testing of potential discriminatory steering practices by realtors.

Goal 7: Expand access to opportunity for protected classes.

Areas with access to good jobs, public transportation, and safe and affordable housing throughout the Twin Cities Region are often inaccessible to disadvantaged communities. Jurisdictions should take steps to increase the financial, housing and transit related barriers members of protected classes face to accessing opportunity within the Region.

- Increase regional cooperation to encourage transit development that connects communities of protected classes to employment and reduces general transit-related isolation of these communities.
- Increase the minimum wage in the metro area to $15 an hour.
- Enact legislation to prevent landlords from requiring excessive security deposits or multiple months' rent.
- Regularly review the screening criteria of the Region's Public Housing Authorities to ensure compliance with HUD Background Screening Guidance, including criminal backgrounds, rental history, and credit history. As mentioned above, the St. Paul Housing Authority should eliminate the current policy of allowing for termination for criminal activity when the alleged activity has not even been reported to law enforcement or proven beyond a reasonable doubt.

- Relax stringent guidelines for reasonable accommodations claims to Public Housing Authorities.
- Consult with industry experts and community groups to create a Racial Justice Framework for analysis of proposed development and siting of affordable housing.
- Provide funding and staffing for public campaigns to combat NIMBY sentiment throughout the region. These campaigns should also include content to dissuade negative notions around voucher holders.

Goal 8: Reduce barriers to mobility.

Practices of public housing authorities (PHAs) can have a significant impact on the location and quality of housing those who rely on subsidized housing can obtain. The PHAs throughout the Region should work independently to ensure their policies comply with fair housing laws and do not result in unnecessary evictions of families. PHAs should also work together to ensure that portability for Housing Choice Voucher holders is available and that it is easy for residents to move to areas of more opportunity.

- Enact policies that provide for regular reviews of residency and other preferences for fair housing impacts.
- Implement selective use of payment standards based on Small Area Fair Market Rents (FMRs), to expand housing choice specifically in zip codes that are areas of opportunity. As an example, for a Minneapolis zip code, the current payment standard for a two bedroom apartment is $1,228. For the same zip code, the Small Area FMR payment standard would be $1,820.
- Condition the receipt of public funds for any new housing development on the acceptance of vouchers and agreement not to discriminate on the basis of an applicant's receipt of public assistance.
- Enact policies providing for regular review of landlord listing services to ensure availability of units in opportunity areas.
- Implement a fair housing auditing policy for LIHTC developments overseen by Minneapolis, St. Paul, Washington County, and Dakota County, specifically assessing voucher holder marketing and access–particularly for family LIHTC housing outside of concentrated areas.
- Expand policies providing for regular landlord/developer outreach and engagement, to encourage and support participation in the voucher program, including periodic workshops and an ongoing working group.
- Institute protocols to regularly review and report on suballocators' LIHTC performance in achieving siting balance (in designated areas of opportunity), and further incentivize development in areas of opportunity through set asides, basis boost designations, and/or increased competitive points.

VII. Appendices

A. Contributing Factors Appendix

Access for Students with Disabilities to Proficient Schools

Access for students with disabilities to proficient schools is a significant contributing factor to fair housing issues for persons with disabilities in the Twin Cities region. First, as the data in the Disability and Access section reflecting concentrations of persons with disabilities by age shows, children with disabilities are disproportionately concentrated in parts of Minneapolis and St. Paul that the Disparities in Access to Opportunity Section shows have relatively low School Proficiency Indices. This spatial mismatch reduces access to proficient schools. Second, within school districts, students with disabilities frequently have worse educational outcomes across a range of metrics than other students. For example, the State of Minnesota has established a statewide target high school graduation rate for students with individualized education plans (IEPs) under the Individuals with Disabilities Education Act of 90%. Statewide, the actual high school graduation rate for those students is 62.3%, but, in the Minneapolis Public Schools, that figure is an even lower 39.4%. Additionally, the suspension and expulsion rate for students with IEPs in the Minneapolis Public Schools is 2.4%, which the State deems to constitute a significant discrepancy from the rate for students who do not disabilities. Disparities are often lower in school districts with more proficient schools but are not totally eliminated. For example, in the Edina Public School District, the high school graduation rate for students with IEPs is 85.9%, which is still below the statewide target and the district's rate for all students. There is not a significant disparity in school discipline in that district, but that is not true of all high performing districts.

Access to Financial Services

According to the FDIC in 2017, 3.4% of the Minnesota population was unbanked and less than 15.7% of the population was underbanked.[73] There are a total of 2251 banks in Minnesota, however in certain cities there is a large percentage of minorities that are underbanked or unbanked.[74] In 2019, the Prosperity Now Scorecard data was broken down by race and found that 54.8% of households of color in the Twin Cities were financially underserved, compared to just 15.4% of white households.[75] The graph below shows the total number of banking institutions that can be found in every target area.[76]

Location	Number of Banks
Anoka County	90
Coon Rapids	10
Dakota County	112
Hennepin County	412
Bloomington	11
Eden Prairie	21

[73] https://www.fdic.gov/householdsurvey/2017/2017report.pdf
[74] http://www.search-banks.com/MN-banks
[75] https://spokesman-recorder.com/2019/04/12/twin-cities-nonprofits-unite-to-serve-underbanked-communities/
[76] http://www.search-banks.com/MN-banks

Minneapolis	241
Minnetonka	20
Plymouth	12
Ramsey County	178
St. Paul	188
Washington County	106
Woodbury	12
Scott County	30
Carver County	1

As the data above suggests, there are a significant amount of financial institutions throughout the Region. Minneapolis and St. Paul have the most institutions, though the outer suburbs and counties do not appear to have a lack of available banks. It does not appear that any group is disproportionately prevented from accessing financial services. However, it is important to note that mere physical access to financial institutions does not preclude the possibility of predatory lending practices. *See Contributing Factor: Lending Discrimination.*

Access to Publicly Supported Housing for Persons with Disabilities

Access to publicly supported housing for persons with disabilities is a significant contributing factor to fair housing issues in the Twin Cities region. Based on the HUD-provided data analyzed in the Disability and Access section of this Assessment, the issue appears to be most pronounced in smaller entitlement cities such as Bloomington, Woodbury, and Plymouth. In these communities, persons with disabilities do not appear to be able to reside in one or more types of publicly supported housing at rates commensurate with their share of the income-eligible population. Although cities lack direct control over some types of publicly supported housing, such as Project-Based Section 8 developments (which are administered directly by HUD) and Other Multifamily developments (which may be overseen by a variety of agencies), they can engage in outreach and education that is targeted at affordable housing providers and that has the goal of securing the voluntary adoptions of admissions preferences. Cities can also attempt to offset the current lack of access through strategic efforts to increase the supply of permanent supportive housing through the prioritization of CDBG and HOME funds for developments that include such housing and collaboration with housing authorities to pair Project-Based Vouchers with affordable units in developments subject to inclusionary zoning requirements. Housing authorities could apply preferences for persons with disabilities, including individuals with supportive services needs, to those units.

Access to Transportation for Persons with Disabilities

Access to transportation for persons with disabilities is a significant contributing factor to fair housing issues for persons with disabilities in the Twin Cities region. Access is especially limited in suburban areas where the density and frequency of bus service is more limited than in the cities of Minneapolis and St. Paul. Suburban areas to the west, southwest, and northeast of Minneapolis entirely lack access to rail-based public transportation. Due to the correlation between disability status and income and the impact of some disabilities on the ability to drive, persons with disabilities are more reliant on public transportation than people who do not have disabilities, so

the overall insufficiency of the public transit system has a disproportionate effect on persons with disabilities. Although paratransit services are available through MetroMobility for individuals who need service outside of established routes, that service can be costly for low-income persons with disabilities and may necessitate lengthy wait times. To illustrate the contrast, the standard, off-peak fare for MetroMobility is $3.50 while the discounted fare for persons with disabilities to ride Metro Transit bus or rail services generally is $1. These barriers are largely structural in nature, and this Assessment did not reveal evidence of specific violations of the Americans with Disabilities Act in the provision of transit services.

Admissions and Occupancy Policies and Procedures, Including Preferences in Publicly Supported Housing

Admissions and occupancy policies and procedures, including preferences in publicly supported housing are a contributing factor to fair housing issues in the Twin Cities region. For a full list of Housing Authorities in the Twin Cities Metro area, see Housing Link's Housing Authority Waiting List.[77] One of the bases for denial of housing by the St. Paul Public Housing Agency is criminal activity. The Admission & Occupancy Policies state the following:

The conduct need not be reported to a law enforcement agency, and need not result in an arrest or prosecution. Such conduct includes, but is not limited to, possession, use or sale of a small amount of marijuana, any other petty misdemeanor, and acts of physical violence or the threat of such acts. Neither proof beyond a reasonable doubt nor conviction in a court of law is necessary to establish violation of the terms of the Dwelling Lease.[78]

HUD guidance has warned against reliance on arrest records in making eligibility determinations. The St. Paul Housing Authority goes even further by not even requiring an arrest to be denied housing. Because of disparities in the criminal justice system, these overly broad policies are more likely to result in the exclusion of Black and Hispanic applicants from publicly supported housing, thus contributing to residential segregation.

The Minneapolis Public Housing Authority relies heavily on good landlord references to determine an applicant's suitability for public housing, as well as employment. These policies may have a disparate impact on people of color. Studies from across the country indicate that people of color are evicted at far higher rates and are thus disproportionately impacted by the reliance on landlord references.[79]

The Dakota County Community Development Agency has a limited number of accessible housing units available, though some programs like the workforce housing program and senior housing

[77] https://housinglink.org/SubsidizedHousing/HousingAuthorityWaitingList

[78] Public Housing Agency of the City of Saint Paul Public Housing Admission & Occupancy Policies https://www.stpha.org/images/policies/ph-aop-2019.pdf

[79] See, e.g. Merf Ehman, *Fair Housing Disparate Impact Claims Based on the Use of Criminal and Eviction Records in Tenant Screening Policies,* Sept. 2015. https://www.nhlp.org/wp-content/uploads/Merf-Ehman-FH-DI-Claims-Based-on-Use-of-Criminal-and-Eviction-Records-Sept.-2015.pdf

program have admissions requirements such as minimum income requirements and criminal background checks.[80]

The Metro Housing and Redevelopment Authority also requires passing a criminal background check to qualify for Section 8 housing vouchers, though their specific interpretations of the federal Section 8 restrictions are unclear.[81]

The Plymouth Housing and Redevelopment Authority also uses criminal activity as a basis for denying admissions, although they are not as stringent as the St. Paul's PHA when determining reasonable cause for denial. The Plymouth Administrative Plan for the Housing Choice Voucher Program states:

In determining reasonable cause, the HRA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A conviction will be given more weight than an arrest. The HRA will also consider evidence from treatment providers or community-based organizations providing services to household members.[82]

St. Louis Park Public Housing Authority's Public Housing Program uses the same above language as the Plymouth HRA for determining reasonable cause for admission denial.[83] Families with household members found to be currently engaged or previously engaged in criminal activity within five years are denied admission, and such activity includes but is not limited to illegal drug use and use or threatened use of physical force.

Bloomington HRA's available information online does not seem to indicate the presence of contributing factors beyond federal Section 8 housing regulations.

Columbia Heights HRA does not participate in the Section 8 housing program.[84] Their admissions and continued occupancy policy is not online.

Mound HRA does not have specific information on their admissions and continued occupancy policy online.

Richfield HRA does not have much information on their admissions and continued occupancy policy online.

Scott County CDA's available information online does not seem to indicate the presence of contributing factors beyond federal Section 8 housing regulations.

---

[80] https://www.dakotacda.org/housing-resources/

[81] https://metrocouncil.org/Housing/Services/Metro-HRA-Rental-Assistance/Applications.aspx?source=child

[82] see Plymouth HRA Administrative Plan for the Housing Choice Voucher Program (PDF)

[83] https://www.stlouispark.org/government/departments-divisions/housing/rental-assistance-housing-authority/public-housing, 2019 Admissions and Continued Occupancy Policy

[84] https://affordablehousingonline.com/housing-authority/Minnesota/Housing-and-Redevelopment-Authority-of-Columbia-Heights/MN105

Washington County CDA does not have much information on their admissions and continued occupancy policy online.

Overall, all PHAs running Section 8 Housing Choice Voucher programs are subject to federal regulations.[85] These regulations mandate PHAs to deny admissions to families with registered sex offenders apart from a "reasonable time" exception, in which individual PHAs can accept such applicants if they decide the applicant has not engaged in such offenses within a reasonable time. Federal regulations also permit PHAs to deny admissions to families currently engaging or have engaged within a reasonable time in illegal drug use, alcohol abuse, violent criminal activity, etc. Depending on how PHAs choose to define terms such as "currently engaging" or "reasonable time," they could exacerbate residential segregation by being more unforgiving of past criminal activity.

Availability of affordable units in a range of sizes

Housing prices range throughout the Region, with units in Minneapolis and St. Paul increasing in price in recent years. Inclusionary zoning rules and efforts to end single-family zoning are helping to address these issues, but Black, Hispanic and Asian or Pacific Islander residents are highly likely to experience overcrowding in many areas of the Region (see Disproportionate Housing Needs). Furthermore, across the Region, the vast majority of affordable housing units available are 0-1-bedroom units, while there is a shortage of households in 3+ bedroom units compared to families with children requiring this housing. Minneapolis, for example, contains 4, 993 families with children in public housing, as compared to 3,027 units with 3 or more bedrooms. This shortage will need to be addressed in future development of affordable housing.

Availability, Type, Frequency, and Reliability of Public Transportation

Generally, public transportation is concentrated within the two hubs of the region, Minneapolis and St. Paul. The farther out from those hubs, and in the more rural counties, transportation options are limited. Metro Transit is the primary provider of transportation for the Twin Cities Area, and the surrounding cities and counties supplement with their own options. The price for Adults, Seniors and Youth is $2.50 during rush hour. For non-rush hour times, the price is $2.00 for Adults, and $1.00 for Seniors and Youth. For those with limited mobility, the price is $1.00 any time. Metro Mobility also operates throughout the region for those who may not be able to use the regular fixed-route service due to a disability or health condition. Metro Mobility fares are $4.50 during peak times, and $3.50 during off-peak hours. It also offers $1.00 downtown fares within Minneapolis and St. Paul. Transit Link also operates throughout the region in areas that regular fixed-routes don't service, or in order to connect unserved areas to fixed-route busses. Transit link fares are $4.50 each way during peak hours, and $3.50 during off peak hours. There is a surcharge for longer trips. Both Metro Mobility and Metro Transit are funded through the Metropolitan Council.

Anoka County

[85] See Title 24 Subsection B Chapter IX §982.553. https://www.ecfr.gov/cgi-bin/text-idx?SID=10bdae55796e0d57e8b55493f50691c2&mc=true&node=sp24.4.982.l&rgn=div6#se24.4.982_1553

Though a suburban county, Anoka County takes extensive steps to ensure frequent and reliable transportation to their residents. The Anoka County Traveler operates several bus routes that run throughout the cities of Anoka, Blaine, Columbia Heights, Coon Rapids, Fridley, Brooklyn Center, St. Anthony, New Brighton and Roseville. There is also express bus service that connects Blaine to Downtown Minneapolis. Metro Transit also operates several routes with connections to Anoka County.

Coon Rapids

As a city within Anoka County, Coon Rapids is serviced by both the Anoka Count Traveler bus, as well as Transit Link Dial-a-ride services. The City is also serviced by Metro Transit's regular and express bus routes. The Northstar Commuter Train provides transportation to downtown Minneapolis, making 12 stops in Coon Rapids during the work week, and more limited stops on the weekends.

Dakota County

The Minnesota Valley Transit Authority operates the Red Line bus rapid transit line that operates all day service along Cedar Avenue in Dakota County. This bus service drives on the shoulder, offering faster travel and more frequent service. It also connects to local transit routes that operate throughout the rest of Dakota and Hennepin County. On weekdays, the bus runs every 20 minutes between 6:30am and 6:30pm, and every 30 minutes between 5:00am and 6:30pm, and between 6:30am and midnight. Metro Mobility and Transit Link both operate within Dakota County as well. Several other public transit options are currently being discussed by the communities in Dakota County, including another rapid transit line, and potential rail or street car options along the Robert Street and Red Rock Corridors. The Jefferson Lines Bus service has one stop in Dakota County, located in Burnsville. The bus offers service to Minneapolis but at limited times throughout the day.

The City of Northfield, home to Carlton College and St. Olaf College, has several of their own transit options. The Northfield Lines Metro Express bus makes stops from Northfield to Downtown Minneapolis, the Airport, the University of Minnesota, among others. An unlimited monthly pass varies by pick up location an destination, but a monthly pass from Downtown Northfield to Downtown Minneapolis is $350.00. These passes do not allow changes in stops throughout the month, they are from a chosen pick up and drop off location. A regular, one-way ticket from Downtown Northfield to Downtown Minneapolis is $25.00. Fixed-route bus and Dial-a-Ride service is also offered in the city of Northfield through ThreeRivers Community Action. Bus service fares are $1.75 each way and the routes operate between 6:00am and 6:00pm on weekdays. Express routes run between 4pm and 11:00pm Monday through Saturday, and between 3:00pm and 6:00pm on Sundays. Dial-a-Ride services are $1.75 each way, and operate between 6:00am and 9:00pm on weekdays, and between 7:00am and 5:00pm on Sundays.

In addition to public transportation options, there are a number of private options as well. Dakota Area Resources and Transportation Seniors (DARTS), provides door-to-door service within Dakota County and neighboring areas. Though the service is convenient and also allows for care providers and service animals to ride along for free, it is quite pricey. For rides that originate within the County, the base fare is $25.00, plus an additional $1.75 per mile. For those rides originating outside of the County, the base fare is $30.00, plus an additional $2.00 per mile.

Hennepin County

Hennepin County is served extensively by Metro Transit bus routes. In addition, two Light Rail transit lines run through the county, the Blue Line (Hiawatha) and the Green Line (Central Corridor). In the works are extensions to the two Light Rail lines. The Blue line will extend west towards Brooklyn Park, and the Green Line will extend Southwest toward Eden Prairie. Fares for the Light Rail are the same as those mentioned above for non-express buses. The Red Line rapid bus transit line also runs through the County. Another rapid transit bus line is on the way as well, the Orange Line, which will extend south from Minneapolis to Burnsville. Hennepin County is also served by the Northstar Commuter rail, which heads south from upper Anoka County to Minneapolis.

Bloomington

Transportation in Bloomington is rather extensive, despite being a farther out suburb. This is perhaps due to the many attractions in the city including Mall of America and the Minneapolis/St. Paul International Airport. Bloomington is accessible by Metro Transit bus lines. In addition to busses, the Light Rail's blue line has 17 stops between downtown Minneapolis and Bloomington, including five in Bloomington itself.

Eden Prairie

SouthWest Transit provides public transportation options for the Southwest Minneapolis suburbs, including Eden Prairie. The buses run on 18 routes throughout the area, with 5 stops in Downtown Minneapolis, and additional stops at places of interest such as the University of Minnesota, Normandale Community College, Best Buy Corporate Headquarters, and Southdale Mall. During peak times, the fare for adults is, youth, and seniors is $3.25. During off-peak times, the fare for adults is $2.50, and the fare for seniors and youth is $1.00. For seniors, the Eden Prairie Senior Center provides a weekly shopping bus for residents, where the fare is a suggested contribution of $4.00. The Senior Center will also provide transportation to events at the Center for residents unable to drive. The fare is also a suggested contribution of $4.00.

The Metro Green Line Southwest Light Rail Transit extension is currently under construction and will open in 2023. Once operational, the line will run from Downtown Minneapolis to Eden Prairie, making additional stops through the southwestern suburbs.

Minneapolis

Minneapolis is the transit hub in the region, and is the original/final destination for most transit options across the region. All of the transit options Metro Transit offers service the City of Minneapolis, including buses, light rail trains, Dial-a-Ride and TransitLink. The Metro A line runs North/South through the city, and the remainder of the lines connect Minneapolis to St. Paul and the outer lying suburbs. There extensive bus routes that run throughout the city, as well as several points of connections to routes that service the outer areas of the region. There are two transit hubs within the city that serve as major points of connection. Downtown Minneapolis is also the final destination for the Northstar Commuter Rail, providing service from the northern city of Big Lake, down through the northern suburbs to Downtown. In addition to driving and public transit,

Minneapolis has consistently been ranked as the most bike-friendly city in the country. This year, the city scored 84, the score range "where biking is convenient for most trips."[86]

Minnetonka

Metro Transit has several bus routes that service the city of Minnetonka, including six local bus routes and nine express bus routes. The city also has four Metro Transit Park and Ride lots that can provide access to nearby bus stations or the opportunity to carpool. Transit Link service is available in locations where bus service is not available, but must be reserved ahead of time. Metro Mobility services for those with disabilities or other health conditions that prevent them from using regular bus service. The service is available for any purpose but must be reserved in advance. Finally, upon completion of the aforementioned Metro Green Line Southwest Light Rail extension, Minnetonka will be serviced by light rail travel that will connect it to Minneapolis, St. Paul, and other nearby communities.

Plymouth

The city of Plymouth offers its own bus service directly to residents via Plymouth MetroLink. The MetroLink has stops throughout the city, express buses to and from Downtown Minneapolis to Plymouth, and local Dial-A-Ride service.

Ramsey County

The County has a mix of travel options. Within St. Paul, there are several options of bus and rail transit. In the farther out portions of the county, options are more limited, with bus stops fewer and farther between, and rail service that has yet to be extended. Some cities provide local transit options to residents, some of which connect to the major transit hubs of Downtown Minneapolis or St. Paul. There are several regional transit plans in development to extend service across the county. The Riverview Corridor plan includes a proposal for a 12-mile streetcar line running from downtown St. Paul and the Minneapolis-St. Paul International Airport, Mall of America, and several stops in between. These stops include existing stops on the Metro Green and Blue Line, as well as nine additional stops. The Rush Line of bus rapid transit will be a 14-mile route between St. Paul and White Bear Lake. The Metro Gold Line will be the first bus rapid transit line that operates primarily using exclusive bus lanes. The route will connect St. Paul with outer lying suburbs to the east of the City (Maplewood) as well as those just outside of the County line (Woodbury, Oakdale, Landfall).

St. Paul

St. Paul is serviced extensively by both bus and rail transit provided through Metro Transit, though with fewer routes than Minneapolis. In Downtown St. Paul, there are stops along 13 local bus routes and 17 express bus routes. Throughout and past downtown, the city is also serviced by the METRO Bus Rapid Transit A Line that runs south from Roseville and down into the city before crossing the river to Minneapolis, and the METRO Light Rail Green line that runs east from downtown Minneapolis, the University of Minnesota's' campus, and through to downtown St. Paul. For those who regularly commute downtown via public transit, many employers provide the Metropass, which is an unlimited ride transit pass offered at a discounted rate. This pass is purchased via payroll deduction, and is no more than $83 a month for unlimited access to all regional busses and trains.

[86] https://www.redfin.com/blog/most-bike-friendly-cities-usa-2020

Washington County

Given that it fluctuates between suburban and rural, transportation can be limited in Washington County, both within the county itself and between the county and the larger employment hubs of Minneapolis and St. Paul. Metro Transit services the County, with services in Oakdale and Mahtomedi. There is service on the Eastern Part of the county in Stillwater, likely due to its popularity as a shopping and dining destination. Washington County also recently added on-demand DARTS Community Circulars in Oak Park Heights, Cottage Grove, Forest Lake, and Mahtomedi. The rest of the county has to rely on private transportation or carpooling, even if it is to connect to Metro Transit via Park and Ride. The County has eight Park-and-Ride facilities that are connected to express bus service. There are also several Park-and-Pool facilities that are not on transit routes but serve to encourage carpooling in the County. Washington County residents are also serviced by both Metro Mobility and Transit Link upon request. In the future, the Metro Gold Line will be the first bus rapid transit line that operates primarily using exclusive bus lanes. The route will connect St. Paul with outer lying suburbs to the east of the City (Maplewood) as well as those just outside of the County line (Woodbury, Oakdale, Landfall).

Woodbury

Though public transit is available in Woodbury, the options are quite limited. Metro Transit offers express bus route service, but almost exclusively via Park-and-Ride facilties. Two bus express bus routes, the 351 and 355, stop in Woodbury at three different Park-and-Rides. These structures are located along the western edge of the city, with no stops further into the city. The 351 route runs from Woodbury to downtown St. Paul, and the 355 runs from Woodbury to the University of Minnesota and downtown Minneapolis. Though great cost and time saving options for commuters, this does little to provide transit service when traveling outside of rush hour. Both buses only weekdays from 6:00am to 9:00am and 3:00pm to 6:30pm. The 355 comes every 10-20 minutes during this time period, while the 351 only comes every 15-30 minutes. Woodbury residents also have access to Transit Link and Metro Mobility services. There are no rail options for the city. In the future, the Metro Gold Line will be the first bus rapid transit line that operates primarily using exclusive bus lanes. The route will connect St. Paul with outer lying suburbs to the east of the City (Maplewood) as well as those just outside of the County line (Woodbury, Oakdale, Landfall).

Scott County

Given that it fluctuates between suburban and rural, transportation can be limited in Scott County, both within the county itself and between the county and the larger employment hubs of Minneapolis and St. Paul. Community engagement with service providers in the County revealed that the vast majority of transportation are in the northern parts of the county, which makes it hard for those who live in the more rural south to access transit and in turn, jobs and services. For example, the only areas of the county serviced by Metro Transit bus routes are Shakopee, located at the very northern tip of the County, Savage, located at the northeaster tip of the County, and Prior Lake, located southeast of Shakopee bust till towards the north of the County. There are several bus routes that service Shakopee, likely due to the Hospital, Canterbury Race Track, and the Valley Fair Amusement Park. There are a few bus stops along Egan Road in Savage, but none that dip down into the rest of the city. There are three bus routes that service Prior Lake, with an additional route that stops at the Mystic Park Casino.

The Minnesota Valley Transit Association provides additional transit services for the southwest suburbs, including those in Scott County. The 421 runs form Savage to Burnsville. The 491 and 492 routes provide commuter service from Prior Lake and Savage to Downtown Minneapolis. The 493 route provides service between Shakopee and Minneapolis. The 495 connects Shakopee to Mall of America, and the 497 runs through downtown Shakopee. Two other routes run from Shakopee to neighboring suburbs.

The County also offers SmartLink Transit, the county's version of Transit Link. Upon request, residents can request Dial-a-Ride service, Medical Assistance rides, and Volunteer Driver programs. Dial-a-Ride services via SmartLink are available on a first come, first serve basis with reservations made in advance. The fare is not available online, but customers are told when a reservation is made. Drivers do not make change, so customers are required to bring exact fare. The Volunteer Driver program allows for regular citizens to offer drivers to those with disabilities when SmartLink doesn't have space or time for additional reservations.

Carver County

Carver County residents are served by an independent transit agency called SouthWest Transit. The agency services the cities of Chaska, Chanhassen, and Carver within the County, as well as neighboring Eden Prairie. The 600 route provides service between Chanhassen and Chaska and downtown Minneapolis. The 690V runs from Chaska, Chanhassen, Eden Prairie, and Downtown Minneapolis. The 695 route runs from Chaska, Chanhassen, Eden Prairie, east Downtown and the University of Minnesota. The 697 route offers service between Carver, Chaska, and downtown Minneapolis. 697E runs just between Chaska and downtown Minneapolis. The six 698 routes offer a combination of routes throughout Chaska, Carver and Chanhassen, going to downtown Minneapolis and the University of Minnesota. Lastly, the 699 runs between Chanhassen and downtown Minneapolis. These three cities are on the eastern edge of the county, there do not appear to be any local or express route public transit options for the western portions of the county. Despite Carver County opting out of MetroTransit general public transit services, the county residents still have access to Metro Mobility Services.

Carver County has several on-demand travel options. SWPrime is a shared ride service that can be requested via phone application or phone call. The service area within the County includes Chaska, Chanhassen, Carver, and Victoria. On Saturdays, service is offered to Southdale Mall. All vehicles are ADA compliant. SWPrime MD is an on-demand option for transportation to non-emergency medical services. Service is provided to Chaska, Chanhassen, Carver, and Victoria, with transportation to all medical facilities in those cities, as well as a few in neighboring areas. Carver County also has access to SmartLink services.

The County is also within the service area for WeCAB, a nonprofit network of volunteers that provides transportation to shopping, worship, Metro Transit, and medical appointments. Residents in Carver, Chanhassen, Chaska, Victoria, Waconia, and Watertown can use the service.

Community Opposition

Despite cities and counties in the Region taking significant steps to increase the supply of affordable and supportive housing, community opposition to new development occurs

significantly across the region. Our community and stakeholder engagement revealed examples of vehement community opposition to a large redevelopment in Arden Hills (Ramsey County), opposition to multifamily development in Eden Prairie (Hennepin County), small cities around Minnetonka that want to avoid developments that accept Section 8 vouchers (Hennepin County), and opposition to the building of a family service center in Maplewood (Ramsey County). Beyond these examples, a cursory search supports the assertion that this community opposition to various forms of affordable housing development happens throughout the region. During a planning commission meeting regarding the expansion of a mobile home park in Rosemount (Dakota County), several residents flooded the meeting to argue concerns about lower property values, increased traffic, and increasing crime.[87] In Hopkins (Hennepin County), city residents opposed an affordable housing complex, citing "concerns related to the parking, security for the neighboring residents, and traffic."[88]

Deteriorated and Abandoned Properties

Rental vacancy rates are extremely low across the state, particularly for affordable housing. A 2013 Minnesota Housing Partnership report found that 84 of Minnesota's 87 counties had more low-income renters than units and nearly half of these counties would need to at least double their affordable housing stock to meet the demand.[89] The Minnesota Housing Task Force also compiled data on vacancy rates throughout the state.

[87] https://www.startribune.com/mobile-home-parks-planning-expansions-to-meet-increasing-demand-despite-local-resistance/569077962/?refresh=true

[88] https://www.hometownsource.com/sun_sailor/community/hopkins/hopkins-council-to-consider-proposed-affordable-housing-complex-at-nov/article_c90b426e-fc01-11e9-8a8d-97582adabeb6.html

[89] https://www.mhponline.org/mhp-blogs/mhp-connect/520-reliable-vacancy-data-hard-to-find-outside-of-metro-area

Statewide Vacancy Rates and Rents – Much of the State is Below 5%

Area	Vacancy Rate	2 Bedroom Average Rent
Northwest	5.7%	$760
West Central	7.6%	$765
Southwest	6.4%	$637
Northeast	5.1%	$1,020
Central	4.3%	$841
Metro	4.3%	$1,259
Southeast	6.2%	$931
Statewide	4.6%	$1,162

Source: Minnesota Housing analysis of data from CoStar. Data accessed on December 4, 2017.

[90]

According to the data gathered in 2018, the statewide vacancy rate is 4.6%. The metro area has the lowest rate, along with central Minnesota. The highest rate is in west central Minnesota at 7.6%. There is also a relationship between the vacancy rate and average rent, as regions with lower vacancy rates have higher average rents. This also poses challenges those who use vouchers. In regions with lower vacancy rates, voucher holders have to compete with all the other renters looking for the few available units.

There are also a large number of abandoned buildings in residential areas in Minneapolis and St. Paul. Nearly 340 residential buildings sit empty and boarded across Minneapolis, despite a severe housing shortage and a steep vacant property fee that has raised $20 million for city services over the past decade.[91] The registry of vacant and boarded properties is less than half what it was at the height of the housing collapse. The nearly $7,000-per-year penalty on property owners has better funded the city staff tasked with monitoring vacant housing, but it hasn't eliminated a problem that officials say drags down values of neighboring homes and attracts crime.[92] St. Paul has 634 vacant properties, according to the city's data.[93] These days, many of the homes left vacant sit in the Twin Cities' most desirable real estate neighborhoods and have increased exponentially in value in recent years.[94] Instead of selling

---

90 https://mnhousingtaskforce.com/sites/mnhousingtaskforce.com/files/media/2018%20Environmental%20Scan.pdf

91 https://www.startribune.com/minneapolis-still-battling-against-vacant-properties-even-in-housing-shortage/484391031/

92 Id.

93 Id.

94 Id.

for profit, the owners pay thousands annually to the city as they wait for the right moment to renovate, tear down or sell.[95]

The 2016 5-Year American Community Survey (ACS) data has an "Other Vacant" category, which are vacant units that are most likely to be abandoned rather than capturing vacation rentals and units that are currently on the rental or sales market. Available data for the Region includes the following vacant units (not properties):

Anoka County– 1,159
Bloomington - 315
Carver County - 755
Dakota County – 1,474
Hennepin County (including Minneapolis) – 8,138
Minneapolis – 3,575
Plymouth - 183
Ramsey County (including St. Paul) – 3,599
St. Paul – 2,518
Washington County – 1,641
Woodbury – 227

Displacement of Residents due to Economic Pressures

After seeing a large uptick in gentrification efforts in 2016, the Greater Minnesota Housing Fund established a $25 million fund to purchase properties at risk of being purchased, renovated and gentrified in the 7-county metro area. The seven-county metro area includes Anoka, Carver, Dakota, Hennepin, Ramsey, Scott and Washington counties. Properties at risk of being purchased by upmarket-minded developers was the focus of this campaign, aiming to preserve apartments identified as "naturally affordable" – typically older, unsubsidized apartments affordable to households earning 60 percent of the average median income, which is $51,480. For example, Hennepin County has about 53 percent of such units in the metro area, amounting to nearly 88,000 apartments, according to data from the housing fund. The $25 million housing fund was to be spread across the metro area, with at least 50 percent of the projects taking place in Hennepin County.

A number of cities in Hennepin County have seen dramatic increases in renter households, including Maple Grove (+210%), Eden Prairie (+52%), Golden Valley (+51%) and Plymouth (+51%). Property sales have continued to accelerate in Hennepin County since 2010, with over 1,000 buildings and 45,450 apartments collectively sold from 2010 to 2018. Dakota County has seen an 18% growth in renters, now totaling 40,564; more than 8,158 units in 103 buildings were impacted by property sales since 2010.

Targeted research has been conducted in Minneapolis and St. Paul regarding gentrification. The results of this research shows that without an equitable and inclusive growth and development strategy, involuntary displacement and cultural displacement will continue occur. Especially at risk are the many Minneapolis residents who are cost-burdened, meaning more than 30% of their

[95] Id.

income goes toward housing costs - mortgage or rental payments. New investment and increased housing demand results in rising housing costs, which has a greater impact on these cost-burdened households. These households are disproportionately households of color, and disproportionately renting versus owning households: 56% percent of black or African-American renting households are cost-burdened, and 51% percent of American Indian, Hispanic and Asian renting households are cost-burdened.

A report from the Minnesota Housing Partnership found that in the Twin Cities metropolitan area, the number of rental property sales increased rapidly between 2010 and 2015, with a disproportionate number of sales in moderate-income, racially diverse neighborhoods.[96] These sales are almost always followed by rent increases. The homeownership market is also experiencing significant price increases that affect low and moderate-income homebuyers and homeowners. The Center for Urban and Regional Affairs (CURA) released a study of gentrification in Minneapolis and St. Paul between 2000 and 2015 that also shed important light on the impact gentrification had on the area. Housing costs for both renters and owners increased at much higher rates in gentrifying neighborhoods between 2000 and 2015. Median home values in gentrifying neighborhoods increased by 31% compared to 13% in non-gentrifying neighborhoods.

Four types of gentrification occurred between 2000 and 2015. Two of the types conform to the "classic" model of gentrification in which incomes rise, housing costs skyrocket, and socioeconomic status also increases significantly. Minneapolis and St. Paul have seen two versions of this model, one that includes large reductions in the Black population and one that does not. There is another pattern of gentrification in which median incomes declined and poverty increased, while at the same time housing costs increased and socioeconomic status increased. There are two racial versions of this model, too; one in which the Black population increased significantly and one in which no significant change occurred. There were four common themes in the interviews with neighborhood residents and business people in the five neighborhood clusters of Minneapolis and St. Paul: presence of whiteness, housing affordability, business turnover, and displacement fears. Though there were commonalities across the clusters, the interviews simultaneously made it clear that the processes of change producing these outcomes were importantly different from one neighborhood cluster to another.

Displacement of and/or Lack of Housing Support for Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking

Victims of domestic violence, dating violence, sexual assault and stalking in Minnesota are entitled to housing related protections. Any tenant in Minnesota who is a survivor of domestic abuse, stalking, or criminal sexual conduct and is not in subsidized housing may break their lease to get away for safety. In order to break your lease you must follow certain steps. First, a victim of domestic violence must get proper documentation showing that they have sought domestic violence aid from the court, law enforcement or a qualified third party. Next, a victim must give written notice to their landlord that they are moving out. There is no 30 or 60-day notice

[96] Minnesota Housing Partnership, *Sold Out*, October 2016, p 7. https://www.mhponline.org/images/Sold_Out_final_small.pdf,

requirement. Finally, a tenant must pay rent in full for the month that they plan to leave and move out of the unit. There are nuisance ordinances in Minneapolis and St. Paul however, landlords cannot penalize or evict tenants for calling police/emergency assistance for domestic abuse or any other conduct (Minn. Stat. 504B.205, subd. 2) and municipalities cannot use local ordinances/rules to require landlords to evict tenants after a certain number of calls in response to domestic abuse, or penalize or charge fees to landlord for 911 calls related to domestic abuse or any other conduct (Minn. Stat. 504B.205, subd. 3). However, this statute does not protect against calls that are made by someone other than the tenant, and nuisance ordinances continue to be on the books and enforced throughout the Region. The Minnesota Department of Public Safety has also listed multiple resources for victims of domestic violence, stalking, sexual assault, human trafficking, child abuse, and mental health. Some of these programs are also minority specific for victims of different backgrounds.

Impediments to Mobility

Impediments to mobility is a significant contributing factor to fair housing issues in the Twin Cities region. Specifically, Housing Choice Voucher payment standards that make it difficult to impossible to secure housing in many, disproportionately White parts of the Region contribute to segregation and disparities in access to opportunity.

As a part of its Rent Reform Move to Work (MTW) activity, Minneapolis Public Housing Authority (MPHA) has one payment standard for all participants in the HCV program. The current maximum payment standards for a two-bedroom unit is $1,228. The Saint Paul Public Housing Agency also has a single payment standard with the maximum payment for a two-bedroom unit set at $1,250. These payment standards are not as generous as Small Area Fair Market Rents (SAFMR) would be if adopted by the Minneapolis and St. Paul housing authorities; the maximum payment standard under SAFMR is $1,820. Housing Choice Voucher participants would have greater access to high opportunity areas if the housing authorities implemented SAFMRs.

It appears as though the other public housing authorities in the Twin Cities region follow HUD's fair market rent standards and would also benefit from adopting the SAFMR payment standard.

Inaccessible Government Facilities or Services

Inaccessible government facilities or services are a significant contributing factor to fair housing issues in the Twin Cities region. Although many people, including many persons with disabilities, primarily rely upon internet searches and agency websites to learn about and access services, most local government websites in the region raise accessibility concerns and do not have transparent, readily findable information about their accessibility. This Assessment did not reveal other current concerns that relate to physical facilities and services although some of the jurisdictions have resolved past issues, including recent changes by the City of St. Paul to the height of its parking meters.[97]

Inaccessible Public or Private Infrastructure

[97] https://www.startribune.com/st-paul-will-upgrade-parking-meters-for-ada-compliance/565551722/

Inaccessible public or private infrastructure is a significant contributing factor to fair housing issues for persons with disabilities in the Twin Cities region. Specifically, there are widespread issues with the accessibility of sidewalks and bus stops in the region. In particular, stakeholders reported that there is a widespread failure to plow and salt sidewalks, curb cuts, and bus stops during the winter months. Both issues are more pronounced in suburban communities, which have gotten a later start in working in a targeted fashion to increase accessibility.[98] These infrastructure deficiencies can have wide-ranging negative consequences in the lives of individuals with ambulatory disabilities, decreasing their access to jobs, education, recreation, and needed services. Since jurisdictions in the region already have plans to address these issues, this Assessment does not propose specific goals to address inaccessible public or private infrastructure beyond ensuring that bus stops and sidewalks are accessible in the winter months.

Lack of Access to Opportunity due to High Housing Costs

Lack of access to opportunity due to high housing costs significantly affects a number of communities within the Region. Rising housing costs across the Region have led to displacement of low-income communities, low-income communities of color in particular, and those with disabilities. These groups are often priced out to more suburban or rural areas, therefore limiting access to transportation and opportunities. MSP Regional Dashboard Indicators from the Minneapolis Saint Paul Regional Economic Development Partnership highlight that in the last year, the annual change in median apartment rent was 4.8%, which doubled since last year. In addition, their dashboard indicates that 29.7% of households are cost-burdened.

The Center for Urban and Regional Affairs (CURA) at the Humphrey School for Public Affairs conducted a Gentrification Study in the region. The CURA study participants spoke of several historically integrated communities and communities that were historically home to people of color in St. Paul and Minneapolis that are experiencing gentrification and subsequent displacement. In addition to qualitative data, the study found that in gentrifying neighborhoods, median rent increased 8.6% compared to just 5.0% in neighborhoods that were not gentrifying.[99] The study found that these gentrifying areas also have higher levels of income inequality—with those at the top seeing increases in income and those at the bottom seeing decreases in income.[100] Three quarters of those interviewed in the study "described being displaced, or having close friends or family who have been displaced," 88% of those interviewed described "the increased presence of white residents in places white people have historically avoided," and every single person interviewed described the "growing lack of affordability in their respective neighborhoods."[101]

Our extensive community engagement supported the study's findings regarding displacement and subsequent lack of opportunity due to high housing costs. We heard from several groups that large, outside developers are coming in—particularly in Minneapolis and St. Paul—and developing large properties that are unaffordable to most existing community members. Areas where this is

[98] https://www.startribune.com/afraid-of-losing-federal-funding-more-suburbs-plan-to-comply-with-ada/504272442/; https://streets.mn/2018/07/02/how-accessible-are-twin-cities-bus-stops/.
[99] http://gentrification.umn.edu/sites/gentrification.dl.umn.edu/files/media/diversity-of-gentrification-012519-exec-summary.pdf
[100] Id. Pg. 2.
[101] Id. Pg 2.

particularly prevalent include Northeast Minneapolis, along the METRO Rail Green Line in St. Paul, Richfield, St. Louis Park, the Westside of St. Paul, and Brooklyn Park. Several community groups and stakeholders reported that, much of this gentrification and displacement is occurring along Metro Rail expansion projects, often pricing out many communities that existed there and relegating them to areas of the region with more limited transit options. In addition, we heard that options for those making 30% of the Area Median Income are extremely limited. Service providers reported unreasonable income requirements landlords impose during the screening process. The use of Small Area Fair Market Rents across the region could offset some of the effects of gentrification and displacement, by allowing those with vouchers to live in areas of high opportunity.

Lack of Affordable, Accessible Housing in a Range of Unit Sizes

The lack of affordable, accessible housing in a range of unit sizes is a significant contributing factor to fair housing issues throughout the Twin Cities region. This problem is most pronounced in the parts of the region outside of the cities of Minneapolis and St. Paul, which are home to both a disproportionate share of the region's affordable housing and a disproportionate share of recent multifamily housing construction, which is subject to the design and construction standards of the Fair Housing Act. As discussed throughout this Assessment, there is an overall shortage of affordable housing in the region and many low-income households suffer from cost burden as a result. Unless a much larger share of affordable housing is accessible than is required under Section 504 of the Rehabilitation Act, an affordable housing shortage will invariably mean that there is a shortage of affordable, accessible housing. The inverse, however, is not true, and an adequate supply of affordable housing would not necessarily entail sufficient affordable, accessible housing. Accordingly, there is a need for targeted requirements for more accessible units than would naturally be produced through ongoing compliance with Section 504. Lastly, a large share of hard units of affordable housing in the region are studio and one-bedroom units. Although these units may meet the needs of some low-income persons with disabilities who have accessibility needs, they are likely to be inadequate for persons with disabilities residing in family households as well as persons with disabilities whose supportive services needs require the assistance of live-in aides.

Lack of Affordable In-Home or Community-Based Supportive Services

The lack of affordable in-home or community-based supportive services is a significant contributing factor to fair housing issues for persons with disabilities throughout the Twin Cities region. Specifically, the Minnesota Legislature has not appropriated adequate funds to eliminate the need for a waiting list for the State's Developmental Disability Waiver program. As a result, most people with developmental disabilities must wait more than 45 days after applying before they are approved to start receiving these critical supportive services. The wait can often be significantly longer than that. As a result of these delays, individuals may unnecessarily remain in segregated settings like nursing homes and intermediate care facilities for persons with developmental disabilities. Alternatively, individuals may be subject to dangerous conditions as, for example, aging parents who no longer have the capacity to meet their adult children's support needs strain to continue to do so. Because there is adequate funding to provide Home and Community-Based Services waivers to other subsets of persons with disabilities on demand, this problem is specifically felt by persons with developmental disabilities. Because the relevant

program is administered at the state level, this contributing factor manifests in similar ways across the region's jurisdictions.

Lack of Affordable, Integrated Housing for Individuals Who Need Supportive Services

The lack of affordable, integrated housing for individuals who need supportive services is a significant contributing factor to fair housing issues throughout the Twin Cities region. Although the State of Minnesota has undertaken significant efforts to provide permanent supportive housing, including in the region, those efforts do not match the scale of the need, and local action is needed to supplement Minnesota Housing's programs. As an example, the Section 811 Project Rental Assistance program subsidizes permanent supportive housing for just 124 households that include persons with disabilities statewide. Although some housing authorities within the region have preferences for persons with disabilities on their Housing Choice Voucher waiting lists, there are additional steps that local governments can take. Specifically, jurisdictions can prioritize the use of HOME and CDBG funds to support permanent supportive housing development. Jurisdictions that oversee inclusionary zoning programs can collaborate with housing authorities that administers vouchers that could be "Project-Based" to achieve deeper affordability in scattered-site units for which persons with disabilities who have supportive services needs could be prioritized.

Lack of Assistance for Housing Accessibility Modifications

A lack of assistance for housing accessibility modifications is a significant contributing factor to fair housing issues for persons with disabilities in the Twin Cities region. Although all of the jurisdictions participating in this Assessment provide funding for grants or low-interest loans for the rehabilitation of owner-occupied homes and those funds can be used for accessibility modifications, there is a lack of programs to assist with the modification of rental properties, in general, and multifamily rental properties built prior to 1991, in particular. Tenants with disabilities living in housing that is not covered by Section 504 of the Rehabilitation Act often need assistance with modifications, whether they are cost-burdened and do not have any source of subsidy or whether they are using a Housing Choice Voucher or other form of tenant-based rental assistance to live in market-rate housing. Additionally, owner-occupied rehabilitation programs could be improved through the establishment of set-aside pools of funding that are specifically for accessibility-related modifications, which is a need across jurisdictions, and by ensuring that discounted interest rates are available to non-elderly persons with disabilities in addition to other categories of homeowners such as elderly households and veterans. In Woodbury, for example, the interest rate for rehabilitation loans is reduced from 3% to 2.75% for applicants who are elderly or who are veterans but not for non-elderly persons with disabilities.

Lack of Assistance for Transitioning from Institutional Settings to Integrated Housing

A lack of assistance for transitioning from institutional settings to integrated housing is not a significant contributing factor to fair housing issues in the Twin Cities region. Multiple programs exist to serve persons with disabilities in the region with the process of moving from institutional settings to integrated housing. Relocation service coordination through the Minnesota Department of Human Services is a covered service for individuals receiving Medical Assistance who are

seeking to move from institutional settings to community-based settings. Additionally, the Metropolitan Center for Independent Living (MCIL) operates a Nursing Home Relocation program in cooperation with local governments in the region, including Hennepin and Ramsey Counties. Of course, the existence of these programs does not guarantee that they are meeting the total demand for transition services, and jurisdictions should consider providing additional funding for MCIL's transition services if that entity has capacity constraints that prevent it from meeting the total need in the future.

Lack of community revitalization strategies

All jurisdictions in the Region have robust plans aimed at increasing community revitalization in the Region. As local governments have moved to address an anticipated increase in the population of the Region in recent years, development efforts aimed at communities in need have increased the availability of housing and commercial services in the Region in general. Strategic plans for economic development and housing in virtually every City in the Region have included plans for increased housing, commercial space and transportation.

Lack of Local or Regional Cooperation

Lack of local or regional cooperation is not a contributing factor to fair housing issues in the Twin Cities Region. Primarily, the Fair Housing Implementation Council (FHIC) has representatives from the 15 HUD entitlement jurisdictions in the metro area, and works together to address fair housing issues. The FHIC has funded numerous partnerships with community organizations that provide fair housing education and outreach, and serves as an information-sharing hub for the jurisdictions to brainstorm solutions to current housing issues. In addition to the entitlement jurisdictions, the Metropolitan Council also has a seat on the FHIC. The Metropolitan Council is a funding and governing body that provides essential services to the region, and serves as the regions policy-making and planning agency. The Met Council reviews the region's affordable housing plans and sets affordable housing production goals for the various jurisdictions. The Council also owns and manages their own affordable housing options.

In addition to knowing when to collaborate, jurisdictions in the Region have also discerned the areas where it makes most sense to focus on their own local needs. One such area is public transportation. In addition to Metro Transit, operated by the Metropolitan Council, several of the outer cities and counties have formed together to make smaller, more localized regional transit services available to their residents. For more information, see *Contributing Factor: Availability, Type, Frequency, and Reliability of Public Transportation*.

Lack of Local Private Fair Housing Outreach and Enforcement

There are several fair housing organizations throughout the Region that service residents facing fair housing challenges on a variety of levels. The Housing Justice Center uses policy advocacy and impact litigation to conduct fair housing enforcement throughout the region. MICAH organizes groups for youth and adults who are homeless, and engages in regular policy advocacy on a city, county, and state level. Southern Minnesota Legal Services and Mid-Minnesota Legal Aid provide services to low-income clients ranging from discrimination, eviction, and issues with publicly supported housing. Beyond legal enforcement of fair housing claims, there are several

organizations in the region that conduct extensive outreach and education around fair housing issues. HomeLine MN provides a landlord tenant advice hotline. Inquilinxs Unidxs engages in tenant organizing actions. Several organizations were also hired by the Fair Housing Implementation Council to do outreach around Analysis of Impediments to Fair Housing Choice including: Equity in Place, Pueblos, Jewish Community Action, African Career, Education, and Resource, New American Development Center. These organizations work directly with underrepresented communities to educate around fair housing issues and identify barriers that these communities face when it comes to housing.

While there are a variety of organizations that provide services throughout the region, to various subsections of the community, nearly all of them are understaffed and under resourced. Particularly for Legal Aid/Legal Services organizations, recruitment and retention of good lawyers can be a challenge based on available salaries and resources. In addition, enforcement services for undocumented individuals lack resources.

Lack of Local Public Fair Housing Enforcement

The two main enforcement bodies in the region are statewide offices, the Minnesota Attorney General's office and the Minnesota Department of Human Rights. The Attorney General's office only has about 300 staff statewide, and just about two dozen attorneys in the Consumer Protection unit. In addition, the office's hotline only recently started accepting calls related to housing issues, but only 2 to 3% of the hotline's daily calls currently relate to housing. The Region could certainly benefit from increased enforcement from the Attorney General's office when it comes to widespread issues such as slumlords, discrimination or tenant abuse in manufactured home communities, and statewide advocacy. The Department of Human Rights deals directly with housing issues, but their enforcement capacity is limited. The Department averages almost a year to complete an investigation, meaning complainants could be evicted or have to remain in unsafe or discriminatory situations for extensive periods of time before issues are either resolved or can move to a lawsuit. Additional resources and staffing that are directed specifically toward fair housing investigation and enforcement could go a long way to beefing up public fair housing enforcement capacity.

Lack of Meaningful Language Access for Individuals with Limited English Proficiency

Federal guidance requires that providers of federally subsidized housing are required to regularly assess the need for language services in their community and provide those services in accordance with that assessment. It does not appear that lack of meaningful language access for individuals with limited English proficiency is a contributing factor to publicly supported housing access in the Twin Cities Region. Service providers did not report a lack of access to translation services for their clients.

Lack of Private Investment in Specific Neighborhoods

Much of the Twin Cities region is growing and drawing new investment from private investors. The growth of Minneapolis and St. Paul is drawing newcomers to more rural counties in the Region, including Carver, Scott and Washington Counties. Rural areas are preparing for anticipated growth of their communities in the coming years, leading to higher investment and

development in those areas. Minneapolis and St. Paul already have extensive revitalization efforts drawing from both public and private investment. However, particular attention needs to be paid to low-income, usually segregated areas of these Cities. The Metropolitan Council extensively documents these efforts and partners with a variety of private sector stakeholders to better inform the direction of public investment. For more information on efforts from local governments to draw private investment to neighborhoods in greater need, see Contributing Factors: *Lack of Public Investment in Specific Neighborhoods* and *Lack of Community Revitalization Strategies*.

Lack of Public Investment in Specific Neighborhoods

The Twin Cities Region has tried in recent years to invest in low-income or otherwise low-investment neighborhoods. [102]Most local governments, including both County and City governments, have plans in place to increase development within underinvested communities. These range from affordable housing plans to revitalization plans of underinvested neighborhoods, usually led by community development agencies within local jurisdictions. The expansion of public transportation in the Region, including light rail connections to Minnetonka and Eden Prairie as well as expanded bus routes to Bloomington, are likely to spur and increase the growth of these communities.

Lack of Resources for Fair Housing Agencies and Organizations

Lack of resources is a contributing factor to fair housing issues in the Twin Cities Region. Many of the organizations that conduct fair housing outreach and education are under staffed, underfunded, and rely heavily on volunteer support. In addition, one of the largest organizations is restricted from representing clients who are undocumented, which can be a challenge given the Region's growing immigrant population. Many of these groups rely on funding from grants and donations. Local governments, including the Fair Housing Implementation Council jurisdictions, should commit to providing regular funding for these organizations. Additional resources could extend their service areas, allow for representation of more clients, and fund additional opportunities for regular outreach and education in underserved communities. *See Contributing Factor: Lack of Local Private Fair Housing Outreach and Enforcement for more information.*

Lack of State or Local Fair Housing Laws

Lack of state or local fair housing laws is a contributing factor to fair housing enforcement in the Twin Cities Region. While there are statewide protections that prohibit discrimination in housing, just Minneapolis, St. Paul, and Minnetonka have additional local protections that deal with housing issues. In addition, there is no statewide source of income discrimination. Service providers report extensive discrimination against voucher holders. Stronger state or local protections could curb discrimination and improve access to more housing, particularly in high opportunity areas that tend to try to limit low-income people of color from moving into their neighborhoods. *See Contributing Factor: Source of Income Discrimination* and *Contributing Factor: Private Discrimination.*

[102] https://metrocouncil.org/Data-and-Maps/Publications-And-Resources/MetroStats/Land-Use-and-Development/The-Twin-Cities-Region-s-Local-Forecasts.aspx

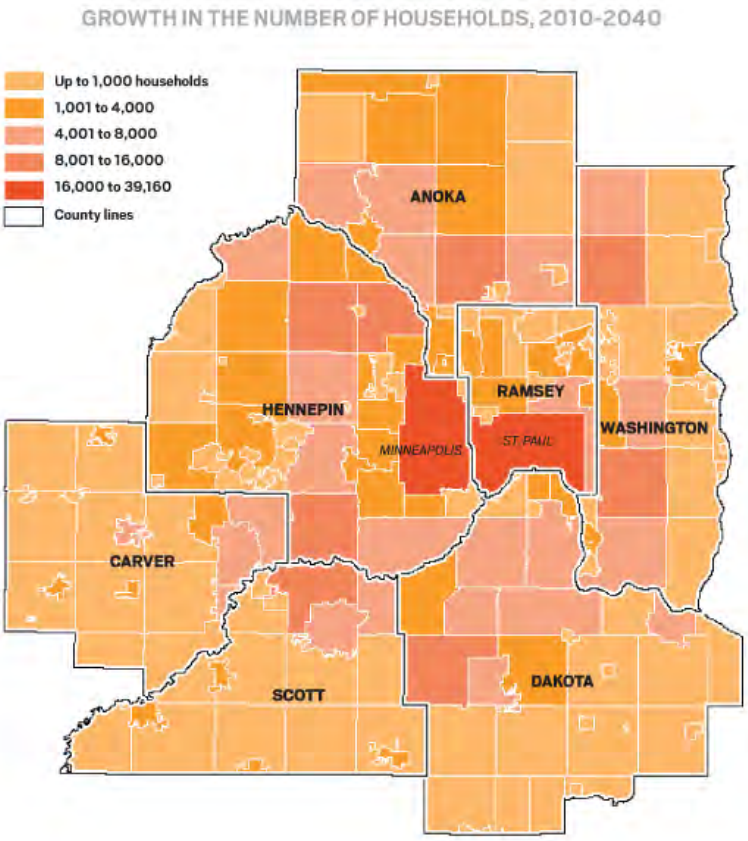
Land Use and Zoning Laws

In the Region, the Metropolitan Council extensively documents both local and regional planning efforts on its website. The Region's Thrive MSP 2040 Plan includes extensive planning for increasing public transportation, parks and affordable housing. Current planning efforts are meant to help the Region accommodate an expected dramatic increase in the population by 2040, while maintaining key resources and affordability throughout the Region. More information can be found in the Region's Land Use Policy[103], which carves out expectations for conservation, water sustainability, affordable housing, transportation and economic development.

OVERALL DENSITY EXPECTATIONS FOR NEW GROWTH, DEVELOPMENT, AND REDEVELOPMENT	
Metropolitan Urban Service Area: Minimum Average Net Density	
Urban Center	20 units/acre
Urban	10 units/acre
Suburban	5 units/acre
Suburban Edge	3-5 units/acre
Emerging Suburban Edge	3-5 units/acre
Rural Service Area: Maximum Allowed Density, except Rural Centers	
Rural Center	3-5 units/acre minimum
Rural Residential	1-2.5 acre lots existing, 1 unit/10 acres where possible
Diversified Rural	4 units/40 acres
Agricultural	1 unit/40 acres

Increasing density is one of the primary concerns of these plans. Minneapolis has gained national attention for its recent decision to end single-family zoning, in order to increase housing density and keep housing prices affordable as the population increases. The map below shows anticipated growth, especially in the Twin Cities, parts of Hennepin County, and areas directly bordering the Twin Cities.

[103] https://metrocouncil.org/Planning/Publications-And-Resources/Thrive-MSP-2040-Plan-(1)/6_ThriveMSP2040_LandUsePolicy.aspx



Lending Discrimination

Lending discrimination is an extremely important metric to consider in this analysis. As previously noted, Minnesota is a state that has extremely high levels of homeownership (71.4%[104]), and many jurisdictions prioritize homeownership as the key to upward mobility for historically disadvantaged groups. Given the scarcity of affordable rental housing and the rising cost of living within the Region, loan opportunities for home purchase loans are critical for moderate and low-income households to attain home ownership. In addition, access to refinancing and home improvement loans are critical tools for these households to maintain homeownership in the face of financial difficulties or necessary repairs. Using Home Mortgage Disclosure Act (HMDA) data, the tables below show the racial discrepancies in the likelihood that a person's loan application, based on their race, will result in an originated loan or a denial. In addition, the data below indicates rates at which certain races receive high-priced loans. High-priced loans, also known as subprime loans, are loans that have higher rates and less favorable terms. The analysis below has HMDA for the entire Metropolitan Statistical Area that encompasses the 7-county metro area, as well as data for each participating county in this AI. Note that this data was not available on a city level.

Minneapolis, St. Paul, Bloomington—MN, WI Metropolitan Statistical Area (MSA)

[104] https://fred.stlouisfed.org/series/MNHOWN

Percentage of Loan Applications Resulting in Originated Loans by Race or Ethnicity and Loan Purpose in the Minneapolis, St. Paul, Bloomington—MN, WI MSA, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	47.09%	66.82%	44.17%
Asian, Not Hispanic	42.94%	67.88%	49.40%
Black, Not Hispanic	36.94%	64.05%	38.73%
White, Not Hispanic	60.96%	71.16%	58.47%
Hispanic or Latino	41.70%	64.96%	45.02%

Across the region, disparities are present between racial groups, though they are starker for loan applications for home improvement or refinancing. For home improvement, white homeowners have a loan origination rate of over 60%, compared to Black homeowners having a loan origination rate of less than 40%. Aside from American Indian homeowners, who have a rate of 47%, the remainder of the racial groups have loan origination rates that hover around 40%. For refinancing loans, there is a 20 percentage point gap between white homeowners and Black homeowners, with white homeowners having a loan origination rate of nearly 60% and Black homeowners having a rate of less than 40%. Besides white homeowners, no other racial group has a refinancing origination rate of more than 50%.

Percentage of Loan Applications Denied by Race or Ethnicity and Loan Purpose in the Minneapolis, St. Paul, Bloomington—MN, WI MSA, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	38.95%	11.86%	27.55%
Asian, Not Hispanic	35.94%	7.22%	20.49%
Black, Not Hispanic	49.52%	12.30%	30.05%
White, Not Hispanic	21.13%	5.11%	16.07%
Hispanic or Latino	42.16%	13.03%	25.45%

Loan denials in the region show even larger disparities. Across all loan types, white applicants have significantly lower levels of loan denials than every other racial groups. Asian applicants have lower denial rates than other racial groups, though they are still more likely to get denied than whites. Across the board, Black and Hispanic/Latino applicants have the highest rates of loan denials. Disturbingly, for home purchase loans, Black and Hispanic/Latino applicants are more than twice as likely to have their home purchase loan applications denied as white applicants. American Indian potential applicants are similarly twice as likely to have their home purchase loans denied as white potential applicants.

Percentage of Originated Loans That Were High-Cost by Race or Ethnicity in the Minneapolis, St. Paul, Bloomington—MN, WI MSA, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Number of Loans Originated	Percentage High-Cost
American Indian	1283	5.37%
Asian, Not Hispanic	18026	3.52%

Black, Not Hispanic	10211	7.71%
White, Not Hispanic	316280	2.67%
Hispanic or Latino	10070	6.90%

In the region, Black borrowers experience the highest rates of sub-prime loans, at 7.71%. Hispanic/Latino and American Indian borrowers have the next highest rates. White and Asian borrowers have the lowest rates of high cost loans, with Whites having the lowest rate.

Anoka County

Percentage of Loan Applications Resulting in Originated Loans by Race or Ethnicity and Loan Purpose in Anoka County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	50.00%	61.81%	44.14%
Asian, Not Hispanic	40.30%	66.71%	48.16%
Black, Not Hispanic	30.71%	63.65%	38.37%
White, Not Hispanic	58.86%	71.18%	58.12%
Hispanic or Latino	40.52%	61.06%	44.21%

In Anoka County, Black borrowers have the lowest rates of loan origination for both home improvement and refinancing loans. For home improvement loans, the origination rate for Black borrowers is virtually half of that for white borrowers, who have a rate of 60%. For refinancing loans, the origination rate for Black borrowers is 20% less than white borrowers. White borrowers have the highest rates of loan origination for home purchase loans, at just over 71%. Asian borrowers have slightly lower rates, with all other racial groups trailing between 7% and 9% behind white borrowers.

Percentage of Loan Applications Denied by Race or Ethnicity and Loan Purpose in Anoka County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	38.89%	15.97%	25.52%
Asian, Not Hispanic	39.55%	9.46%	21.29%
Black, Not Hispanic	51.18%	12.72%	29.97%
White, Not Hispanic	24.41%	5.90%	16.24%
Hispanic or Latino	40.52%	17.60%	24.90%

For Home Purchase loans, white applicants in Anoka County have the lowest rates of loan denial at just under 6%. Aside from Asian applicants, every other minority group has drastically higher rates of loan denial. For Hispanic/Latino and American Indian applicants, the rate is nearly three times as high. For Black applicants, the rates is twice as high. These disparities exist across the other loan types as well. For both home improvement and refinancing loans, Black applicants have drastically higher rates of loan denial as white applicants. Disparities smooth out for refinancing loans across races except for white applicants, which still have significantly lower rates of denial.

Percentage of Originated Loans That Were High-Cost by Race or Ethnicity in Anoka County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Number of Loans Originated	Percentage High-Cost
American Indian	162	7.41%
Asian, Not Hispanic	1,558	4.11%
Black, Not Hispanic	1,222	9.49%
White, Not Hispanic	34,821	3.49%
Hispanic or Latino	977	8.29%

Across all loan types, Black residents in Anoka County have the highest rates of receiving subprime or high-cost loans, followed by Hispanic/Latino and American Indian borrowers. White borrowers have the lowest rates, at roughly third of the rate of Black and Hispanic/Latino borrowers.

Dakota County

Percentage of Loan Applications Resulting in Originated Loans by Race or Ethnicity and Loan Purpose in Dakota County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	38.10%	66.67%	47.01%
Asian, Not Hispanic	48.00%	67.47%	53.23%
Black, Not Hispanic	40.68%	66.24%	40.76%
White, Not Hispanic	63.33%	71.70%	59.61%
Hispanic or Latino	45.45%	62.64%	46.40%

In Dakota County, while white borrowers still have the highest rates of loan origination for home purchase loans, the disparities are less pronounced. Across all races, the range of percentages is just over 9%. Hispanic/Latino borrowers have the lowest rates of home purchase loan origination, at 62%. For Home Improvement loans, the disparities are quite stark. While white borrowers have loan origination rates of over 63%, Asian and Hispanic/Latino borrowers have rates below 50%, Black borrowers have rates at just 40%, and American Indian borrowers have a rate of 38%. For Refinancing loans, white borrowers once again have the better outcomes. Black borrowers have Refinancing loans originated 20% less than white borrowers, and American Indian and Hispanic/Latino borrowers have loans originated 15% less than white borrowers. Asian borrowers have the highest rates of Refinancing loan origination out of all minority groups.

Percentage of Loan Applications Denied by Race or Ethnicity and Loan Purpose in Dakota County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	38.10%	13.48%	23.93%
Asian, Not Hispanic	30.29%	7.53%	18.26%
Black, Not Hispanic	43.22%	10.34%	26.90%
White, Not Hispanic	19.25%	4.86%	15.49%
Hispanic or Latino	42.25%	16.70%	21.37%

For Home Purchase loans, white applicants have the lowest rates of denial as well, which is under 5%. Asian applicants have denial rates under 8%, but the remainder of the racial groups in Dakota County have denial rates well into the teens. For Refinancing loans, rates of denial are relatively low across the board, but Black applicants have a rate of denial that is 10% higher than white residents. American Indian applicants are denied 23% of the time, compared to just 15% for white applicants. For Home Improvement loans, the differences in denial rates are drastic. Less than 20% White applicants are denied, while over 40% of Black and Hispanic/Latino applicants are denied, 30% of Asian applicants were denied, and nearly 40% of American Indian residents were denied.

Percentage of Originated Loans That Were High-Cost by Race or Ethnicity in Dakota County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Number of Loans Originated	Percentage High-Cost
American Indian	157	3.82%
Asian, Not Hispanic	2,046	2.10%
Black, Not Hispanic	1,334	5.25%
White, Not Hispanic	40,935	2.30%
Hispanic or Latino	1654	8.10%

In Dakota County, Hispanic/Latino borrowers have the highest rates of receiving subprime loans, at just over 8%. While this number is low, it is nearly four times the rate at which Asian and white borrows receive them. Asian borrowers have the lowest rates of subprime loans, at just 2%. Black borrowers fall in the middle, with 5% of originated loans for Black borrowers being subprime.

Hennepin County

Percentage of Loan Applications Resulting in Originated Loans by Race or Ethnicity and Loan Purpose in Hennepin County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	38.18%	66.27%	38.58%
Asian, Not Hispanic	43.05%	68.60%	50.52%
Black, Not Hispanic	37.04%	63.56%	38.76%
White, Not Hispanic	60.85%	71.27%	58.94%
Hispanic or Latino	39.12%	67.34%	44.30%

For Home Purchase loans, borrowers in Hennepin County have roughly similar rates of loan origination. White borrowers have the highest rates, at 71%, and Black borrowers have the lowest rate, at 63%. The remainder of borrowers fall somewhere in the middle. Disparities among Home Improvement and Refinancing loans are more stark. For Home Improvement, white borrowers have loan origination rates over 60%, while Asian borrowers have rates below 45%, and the remainder of borrowers have rates below 40%. Black borrowers have the lowest rates of origination, at 37%. Similarly, white borrowers have Refinancing loan origination rates of nearly 60%, compared to 44% for Hispanic/Latino borrowers and below 40% for Black and American Indian Borrowers.

Percentage of Loan Applications Denied by Race or Ethnicity and Loan Purpose in Hennepin County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	43.64%	10.75%	34.12%
Asian, Not Hispanic	35.81%	6.56%	19.38%
Black, Not Hispanic	51.23%	13.01%	30.41%
White, Not Hispanic	19.64%	4.02%	15.16%
Hispanic or Latino	42.98%	10.21%	26.60%

In Hennepin County, white and Asian applicants have the lowest rates of loan denials across the board. Black applicants have the highest rates of loan denial across the board, and at dramatically lower rates than white applicants. Hispanic/Latino applicants have the next lowest rates, followed by American Indian applicants. In the case of Home Purchase loans, American Indian and Hispanic/Latino applicants have applications denied at more than twice the rate of white applicants, and Black applicants are denied over three times as often.

Percentage of Originated Loans That Were High-Cost by Race or Ethnicity in Hennepin County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Number of Loans Originated	Percentage High-Cost
American Indian	390	4.87%
Asian, Not Hispanic	7,055	2.85%
Black, Not Hispanic	4,787	7.90%
White, Not Hispanic	98,567	1.83%
Hispanic or Latino	3,911	5.45%

White and Asian borrowers in Hennepin County are significantly less likely to receive a subprime loan. Across all loan types, just under 3% of loans for Asian applicants and just under 2% of loans for white applicants are considered high cost. Comparatively, nearly 5% of loans for American Indian applicants, 5.5% of loans for Hispanic/Latino applicants nearly 8% of loans for Black applicants are considered subprime or high cost.

Ramsey County

Percentage of Loan Applications Resulting in Originated Loans by Race or Ethnicity and Loan Purpose in Ramsey County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	62.96%	69.23%	44.27%
Asian, Not Hispanic	42.21%	67.26%	44.24%
Black, Not Hispanic	33.33%	60.16%	34.13%
White, Not Hispanic	60.80%	70.67%	56.75%
Hispanic or Latino	40.57%	63.45%	41.32%

In Ramsey County, disparities among Home Purchase loan applications exist, though they are not as stark as other areas of the Region. White borrowers have the highest rates of loan origination, at 70%. Black borrowers have the lowest rates of loan origination, at 60%. Rates for the remaining

racial groups fall along this range. Interestingly, American Indian borrowers have the second highest rates of loan origination, which is unusual compared to the rest of the Region. Similarly, for Home Improvement loans, American Indian borrowers actually have the highest rates of loan origination, followed by white borrowers, both over 60%. The remaining borrowers of different races have rates ranging from just 33% for Black borrowers, to 42% for Asian borrowers. For Refinancing loans, white borrowers have the highest rates of origination, at 56%. Black borrowers have drastically lower rates, at 56%, while the remaining racial groups have origination rates ranging from 41 to 44%.

Percentage of Loan Applications Denied by Race or Ethnicity and Loan Purpose in Ramsey County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	25.93%	13.08%	25.19%
Asian, Not Hispanic	35.69%	7.85%	24.36%
Black, Not Hispanic	50.98%	13.57%	33.96%
White, Not Hispanic	20.59%	4.77%	17.09%
Hispanic or Latino	41.98%	15.80%	30.24%

Hispanic/Latino applicants have the highest rates of denial for Home Purchase loans in Ramsey County, followed by Black and American Indian applicants. Compared to white applicants, who are denied just under 5% of the time, Hispanic/Latino applicants are denied over three times as often, with Black and American Indian applicants denied just under three times as often. The same disparities are prevalent for Home Improvement Loans. White applicants are denied just 20% of the time, whereas Black applicants are denied 50% of the time. 42% Hispanic/Latino Home Improvement loan applicants are denied, 35% of Asian applicants are denied, and 25% of American Indian applications are denied. For Refinancing loans, the most stark discrepancies are between white and Black applicants. Black applicants are denied twice as often as white applicants for Refinancing loans, with other racial groups being denied 10% more often.

Percentage of Originated Loans That Were High-Cost by Race or Ethnicity in Ramsey County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Number of Loans Originated	Percentage High-Cost
American Indian	165	6.06%
Asian, Not Hispanic	4,222	5.28%
Black, Not Hispanic	1,299	9.39%
White, Not Hispanic	31,986	2.59%
Hispanic or Latino	1,571	8.02%

In Ramsey County, Black borrowers are the most likely to receive loans that are high cost or subprime, followed by Hispanic/Latino borrowers, American Indian borrowers, and Asian borrowers. Just 2.59% of white borrowers receive subprime loans, compared the other racial groups who receive them between 5 and 9% of the time.

Washington County

Percentage of Loan Applications Resulting in Originated Loans by Race or Ethnicity and Loan Purpose in Washington County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	40.00%	67.37%	53.25%
Asian, Not Hispanic	49.15%	68.80%	48.67%
Black, Not Hispanic	42.70%	68.16%	40.75%
White, Not Hispanic	63.36%	71.15%	59.45%
Hispanic or Latino	48.10%	66.12%	50.35%

In Washington County, disparities among racial groups for Home Purchase loan origination are very slight. White residents do have the highest rates of loan origination, and Black borrowers have the lowest rates, but the differences among all the racial groups span just five percentage points. Disparities are starker for Home Improvement and Refinancing loans, where white borrowers have origination rates near or above 60%. Rates of origination are in the forties for all other racial groups Home Improvement loan applications. For Refinancing loans, just 40% of Black applicants have loans originated, significantly lower than white borrowers as well as nearly 10% less often than all other racial groups as well.

Percentage of Loan Applications Denied by Race or Ethnicity and Loan Purpose in Washington County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	60.00%	8.42%	22.08%
Asian, Not Hispanic	29.66%	6.34%	19.57%
Black, Not Hispanic	43.82%	9.82%	26.75%
White, Not Hispanic	20.86%	5.13%	15.82%
Hispanic or Latino	37.97%	11.83%	20.80%

Hispanic/Latino applicants have the highest rates of Home Purchase loan application denials, at nearly twice the rate of white applicants. Black and American Indian home purchase applicants have similarly high rates of denial. For Home Improvement loans, American Indian applicants have the highest rates of denial, at nearly triple the rate of white applicants, and Black applicants are denied at twice the rate of white applicants. For Refinancing loans, white applicants have a denial rate just 15%, compared to all other racial groups who are denied roughly 20% or more of the time.

Percentage of Originated Loans That Were High-Cost by Race or Ethnicity in Washington County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Number of Loans Originated	Percentage High-Cost
American Indian	109	3.67%
Asian, Not Hispanic	1,427	2.80%
Black, Not Hispanic	751	4.66%
White, Not Hispanic	26,905	2.14%
Hispanic or Latino	698	4.58%

While the overall rates are low for Washington County, White and Asian borrowers are the least likely to receive high cost or subprime loans. Black and Hispanic/Latino borrowers are the most likely to receive such loans. American Indian borrowers fall in the middle.

Scott County

Percentage of Loan Applications Resulting in Originated Loans by Race or Ethnicity and Loan Purpose in Scott County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	50.50%	67.24%	51.92%
Asian, Not Hispanic	40.91%	66.83%	52.06%
Black, Not Hispanic	38.71%	67.40%	40.76%
White, Not Hispanic	59.85%	71.64%	60.71%
Hispanic or Latino	48.39%	66.04%	43.98%

Disparities among Home Purchase loan origination rates for Scott County are slight, ranging just five percentage points. White borrowers have the highest rates of Home Purchase loan origination at 71%, and Asian and Hispanic/Latino borrowers have the lowest rates at 66%. Disparities are more prevalent in Refinancing and Home Improvement loans. For both, white borrowers have rates at or nearing 60%, while Black borrowers have rates of roughly 40% in both categories. Hispanic/Latino borrowers have the next lowest rates of origination for both categories, followed by American Indian borrowers for Refinancing and Asian borrowers for Home Improvement.

Percentage of Loan Applications Denied by Race or Ethnicity and Loan Purpose in Scott County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	43.75%	5.17%	15.38%
Asian, Not Hispanic	43.18%	7.10%	19.94%
Black, Not Hispanic	48.39%	10.68%	28.44%
White, Not Hispanic	21.85%	4.64%	14.23%
Hispanic or Latino	38.71%	11.76%	21.58%

For Home Purchase loans, white applicants are least likely to have their loan applications denied and Hispanic/Latino applicants are most likely to have their loan applications denied, followed closely by Black applicants. For Home Improvement loans, Black, American Indian, Asian, and Hispanic/Latino applicants are denied at roughly twice the rate of white applicants. For Refinancing loans, Black applicants are also denied at twice the rate of white applicants, and the remaining racial groups are denied between 1 and 7% percent more often.

Percentage of Originated Loans That Were High-Cost by Race or Ethnicity in Scott County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Number of Loans Originated	Percentage High-Cost
American Indian	74	4.05%
Asian, Not Hispanic	911	3.29%
Black, Not Hispanic	344	5.23%
White, Not Hispanic	15,651	2.34%

Hispanic or Latino	368	6.25%

In Scott County, Hispanic/Latino and Black borrowers were are the most likely to receive subprime or high cost loans, while white and Asian borrowers remain the least likely. American Indian borrowers fall between the two.

Carver County

Percentage of Loan Applications Resulting in Originated Loans by Race or Ethnicity and Loan Purpose in Carver County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	100%	78.26%	73.68%
Asian, Not Hispanic	25.00%	66.90%	55.38%
Black, Not Hispanic	33.33%	68.82%	42.31%
White, Not Hispanic	61.77%	69.87%	60.97%
Hispanic or Latino	50.00%	60.16%	57.14%

In Carver County, disparities among Home Purchase loans are pronounced at the high and low ends of the spectrum, less so throughout. American Indian borrowers have the highest rates of loan origination across the board, though this number may be skewed due to the very small number of overall originated loans (33). Excluding this data point, white borrowers have the highest rates of loan origination across all loan types. Hispanic/Latino borrowers have the second highest rates of loan origination for Home Improvement and Refinancing loans, yet the lowest for Home Purchase loans. Aside from white and American Indian borrowers, Black borrowers have the highest rates of origination for Home Purchase loans, yet the lowest for Refinancing loans and the second lowest rates for Home Improvement loans. Asian residents have the lowest Home Improvement loan origination rates, and the second lowest rates for Refinancing loans.

Percentage of Loan Applications Denied by Race or Ethnicity and Loan Purpose in Carver County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Home Improvement	Home Purchase	Refinancing
American Indian	N/A	8.70%	5.26%
Asian, Not Hispanic	41.67%	3.45%	14.36%
Black, Not Hispanic	66.67%	8.60%	21.15%
White, Not Hispanic	19.23%	4.98%	14.25%
Hispanic or Latino	44.44%	10.98%	16.07%

Roughly 10% of Hispanic/Latino loan applicants and 8% of American Indian and Black applicants are denied in Carver County. These rates are more than half that for white or Asian applicants. Asian applicants have the lowest rates of denial, at just 3.45%.

Percentage of Originated Loans That Were High-Cost by Race or Ethnicity in Carver County, MN, 2014-2017 Home Mortgage Disclosure Act Data

Race or Ethnicity	Number of Loans Originated	Percentage High-Cost
American Indian	33	3.03%
Asian, Not Hispanic	402	1.24%

Black, Not Hispanic	88	3.41%
White, Not Hispanic	12,094	2.03%
Hispanic or Latino	221	5.88%

Rates of subprime or high cost loans are generally low across racial groups in Carver County, ranging from roughly 1 to 6%. Asian applicants receive the lowest amount of high cost loans, while Hispanic/Latino borrowers receive the highest. Roughly 3% American Indian and Black borrowers in the county receive high cost or subprime loans.

Location and Type of Affordable Housing

Location and Type of affordable housing is a contributing factor to disparities in access to opportunity and fair housing issues in the Twin Cities Region. While low-income communities, particularly communities of color are concentrated in the inner cities and immediate suburbs of the region, these area are increasingly and rapidly becoming gentrified. Stakeholders reported several instances of outside investors buying up large developments where the majority of residents were low to moderate-income residents of color, or where a large majority were voucher holders. These tenants were evicted and the developments were flipped to market rate. Many outer cities in the region resist affordable housing development, especially affordable housing that would increase density. The type of affordable housing available is also a significant issue. The majority of subsidized housing in the region is not hard units, but housing vouchers. The rampant and blatant source of income discrimination that occurs throughout the Region relegates low-income families to rental housing owned by slumlords or into areas of the region that are not high opportunity. In addition, half of the LIHTC development units are reserved for At-Risk populations, including large families, the elderly, people with disabilities, and formerly homeless individuals. This leaves just over 18,000 units available for the remainder of the families who need public housing assistance. Jurisdictions in the Region should prioritize additional family units within new LIHTC developments, as well as passing source of income protections.

Location of Accessible Housing

The location of accessible housing is a significant contributing factor to fair housing issues in the Twin Cities region. As discussed in detail in the Disability and Access section of this Assessment, the location of accessible housing is heavily linked to two factors: the location of publicly supported housing that is subject to the accessibility requirements of Section 504 of the Rehabilitation Act and the location of multifamily housing constructed from 1991 to the present that is subject to the design and construction standards of the Fair Housing Act. In the region, both types of housing is heavily and disproportionately concentrated in the cities of Minneapolis and St. Paul, in general, and in relatively segregated areas with higher concentrations of Black, Hispanic, and Asian and Pacific Islander residents, in particular. These areas include many of the region's R/ECAPs. As a result, individuals needing accessible housing have relatively few options in the region's suburban communities and in areas like southwest Minneapolis or Highland Park in St. Paul. This has profound effects on environmental health for persons with disabilities who need accessibility features and access to proficient schools for students with disabilities that require accessibility features.

Location of Employers

The biggest concentrations of unemployed workers lack frequent transit service to some of the richest concentrations of job vacancies, particularly jobs in the south and southwest metro. Accessibility to jobs via transit varies significantly by residential location and industry sector, with vacancies in certain sectors much more easily accessible from some parts of the region than others.[105] While transit access is generally good in the inner city, some areas of with concentrations of communities of color— such as North Minneapolis, Brooklyn Park, and Midway St. Paul— have relatively poor access to entry-level jobs despite being near major employment centers.[106] There is a strong perception of need for more coordination of transit and workforce development. This appears to be particularly true in suburban areas where transit has traditionally had less relevance to workforce development than in urban areas with at least high levels of traditional bus service.[107]

An in-depth study was conducted by the University of Minnesota in Ramsey County regarding spatial mismatch by comparing the counties' unemployment rate, poverty rate, percentage of household with no vehicles, percentage of those with a high school diploma, percentage of white citizens, and travel time to work.[108] This study also compared the median household income versus travel time to work. [109] The result of this comparison shows that there is a clear relationship between income and the longest ranges of commuting. [110] 1 in 20 workers in the lowest income group work more than 50 miles from home. Meanwhile, only 1 in 40 workers in the highest income group are in this situation.[111] Their research found that in the case of Ramsey County, it is true that the neighborhoods with higher unemployment rates are mostly located within the core city of St. Paul, and that the households within these neighborhoods do tend to be more low-income, and less white, while also owning less vehicles and having lower educational attainment.[112] The results also indicated that the spatial distribution of commute times and distances is fairly similar across Ramsey county, although workers living in the core city and workers earning less money tend to have a higher upper limit for their commute times and distances.

Location of Environmental Health Hazards

In Minnesota, location of environmental hazards is a significant contributing factor to where citizens live and indicates how low-income people, people of color, and indigenous people are affected disproportionately by pollution in the areas they live in. In Minnesota, for instance, 32% of all communities have air pollution-related risks above health guidelines.[113] However, the percentages of communities of color and lower income communities that experience risks above

[105] http://www.cts.umn.edu/research/featured/transitandworkforce
[106] Id.
[107] Id.
[108] https://conservancy.umn.edu/bitstream/handle/11299/206445/RC%205e-GEOG%205564-Report.pdf?sequence=3&isAllowed=y
[109] Id.
[110] Id.
[111] Id.
[112] Id.
[113] https://www.pca.state.mn.us/air/disproportionate-impacts-minnesota

health guidelines are far higher. Within low-income communities, the number is 46%.[114] Within communities of color, it's 91%.[115] In other words, lower income communities, and especially communities of color in Minnesota, are potentially exposed to higher air pollution levels than the state average.[116] Seventy-six out of about 2,000 facilities in Minnesota have modeled risks above safety guidelines.[117] However, only about 6% of communities in Minnesota are near one or more of these facilities.[118] Of these, 14% of communities of color, which include indigenous peoples, and 9% of low-income communities are located near one or more of these facilities.[119]

The closure of coal plants, combined with the installation of highly efficient air pollution controls at remaining coal plants owned by Xcel Energy and Minnesota Power has resulted in significant reductions in coal combustion-related pollution in Minnesota. [120] Utilities in Minnesota project that additional coal-fired units will close by 2030, given the continued evolution of electricity generation. [121]

More specifically, there are a number of different polluting facilities in counties included in this analysis. The Minnesota Pollution Control Agency has compiled a graph indicating where power plants and other sources of pollution are located and how it impacts poor, colored and indigenous communities. The percentages listed indicate either the percentage of people of color in that sites community or the percent of population under 185% of the federal poverty level.

- Burnsville Sanitary Landfill in Dakota County that is located near a community being 27% people of color and a poverty percentage of 46%.[122]
- Pine Bend Energy LLC in Dakota County with a poverty percentage of 18%in their community.[123]
- Xcel Energy - Black Dog in Dakota County with a poverty percentage of 24% in their community. [124]
- Xcel Energy - Allen S King Generating Plant in Washington County with a poverty percentage of 45% in their community. [125]
- Covanta Hennepin Energy Resource Co LP in Hennepin County with a poverty percentage of 35% in their community. [126]
- Xcel Energy - Riverside Generating Plant in Hennepin County that is located near a community being 32% people of color and a poverty percentage of 51%.[127]

[114] Id.
[115] Id.
[116] Id.
[117] Id.
[118] Id.
[119] Id.
[120] Id.
[121] Id.
[122] https://www.pca.state.mn.us/air/power-plants-and-environmental-justice
[123] Id.
[124] Id.
[125] Id.
[126] Id.
[127] Id.

- District Energy St Paul Inc-Hans O Nyman in Ramsey County with a poverty percentage of 40% in their community. [128]

Location of Proficient Schools and School Assignment Policies

The location of proficient school and school assignment policies is a contributing factor to disparities in access to proficient schools in the Twin Cities region. School assignment is generally determined by basic geography, so zip code very much determines one's access and opportunities. In the Disparities in Access to Opportunity analysis, school proficiency demonstrated some of the most serious gaps across communities in the County. Particular gaps were observable when comparing the interior cities to suburban communities. The most proficient schools in the Region are located in the outer western and southwestern suburbs. These areas tend to have far smaller populations of minority groups, and tend to be less receptive to new affordable housing development that might allow for more low to moderate-income residents to move in.

To provide more access to proficient schools across the state, the Minnesota Department of Education does have an open enrollment program. Students wishing to transfer to a school district outside of their assigned district must fill out an application form. Once accepted, students may attend an out of district school. There are only a certain number of transfer spots available, and in the event that demand for a certain district is too high, siblings of already accepted students will receive priority to attend schools in the same district. Despite the existence of such a program, there is relatively low engagement in it. In 2017-2018, just 9% of students in the entire state were in the Open Enrollment program.[129] This could be for a variety of reasons. Two could be lack of knowledge and access. In particular, the application on the Department of Education website is only available in English, and does not direct applicants to versions in other languages or paper options. Additionally, the program generally requires open enrollment students to provide their own transportation. Without a car, access to these schools farther out in the Region may be entirely unattainable, either due to a lack of public transportation or the fact that public transportation options might be too long or cumbersome. Even with a car, the cost of gas may be prohibitive, and drop off/pick up of a student may be infeasible given work or other childcare obligations.

In addition to barriers of time and resources, certain areas within the region have even tried to cabin off access to these schools from certain populations. For example, stakeholders reported that some school districts with growing Somali populations attempted to redraw districts to exclude them. Stakeholders also reported that in Apple Valley, attempts were made to draw districts to exclude manufactured home communities and areas with concentrations of multifamily apartment buildings.

Loss of Affordable Housing

More than a quarter of Minnesota households spend more than 30 percent of their income on housing, according to Homes for All, a statewide coalition of more than 200 organizations working to make sure all Minnesotans have safe and secure housing.[130] According to the Minnesota

[128] https://www.pca.state.mn.us/air/power-plants-and-environmental-justice
[129] https://education.mn.gov/MDE/fam/open/
[130] https://www.house.leg.state.mn.us/SessionDaily/Story/13491

Housing Partnership, 67% of households that earn $25,750 or less per year spend more than half of their income on housing, leaving them "severely cost-burdened." Of the 125,094 households that earn between $25,751 and $42,900 per year, 30% spend at least half of their income on housing.[131] Even in households that earn 61 to 80% of the area's median income ($51,481 to $65,700), 35% are cost burdened and 6% are severely cost burdened, according to the Minnesota Housing Partnership's report.[132]

A biennial report of the Minnesota Housing Partnership, called the State of the State's Housing, was released in 2019 and helps explain Minnesota's lack of affordable housing. More than 1 in 4 — or 572,133 — households in Minnesota pay more than they can afford for housing, making it likely that they cut back on necessities like food, education and medicine simply to pay their rent or mortgage.[133] That number grew by nearly 26,000 households from 2015 to 2017.[134] The gap between housing costs and incomes is also growing. From 2000 to 2017, median rent has risen 13%, while median renter income has fallen 5%.[135] There are more than 179,400 extremely low-income renter households in Minnesota; yet, there are only 68,104 affordable and available units at this income level across the state.[136]

Cost burden disparately impacts households of color as well. In Minnesota, 40% of households of color experience cost burden compared to only 23% of white households.[137] Additionally, Minnesota continues to be ranked among the states with the worst racial disparities in homeownership in the country. Nationally, the homeownership gap is 25 percent.[138] In Minnesota, it is far wider at 36 percent.[139]

Minnesota's top in-demand jobs do not pay enough to afford housing. Only one of the seven top in-demand jobs in Minnesota pays enough to afford a median-value home.[140] Only two of these jobs pay enough to afford a two-bedroom apartment.[141] High housing costs continue to put Minnesota seniors specifically at risk. 57% percent of all senior renters and more than a quarter of all senior homeowners pay more than 30% of their income for housing.[142] By 2035, more than 1 in 5 Minnesotans will be 65 or older, a 64% increase from 2017.[143] Their report also includes

[131] Id.
[132] Id.
[133] http://www.mhponline.org/images/stories/images/research/SOTS-2019/SOTS_takeaways_and_solutions-revised.pdf
[134] Id.
[135] Id.
[136] Id.
[137] Id.
[138] Id.
[139] Id.
[140] Id.
[141] Id.
[142] Id.
[143] Id.

regional analyses and county profiles for each county in Minnesota to highlight their individual issues and needs.[144]

Occupancy Codes and Restrictions

Anoka County, MN
The Anoka County website highlights an incomplete list of codes that is going to be updated.[145] The Anoka County Code does not define "family". At this time, there are no restrictions regarding where voucher holders can or cannot live.

Coon Rapids, MN
The Coon Rapids Occupancy Code defines occupancy as; Occupancy- No person is allowed to occupy, or permit another person to occupy, any residential or nonresidential structure, building, or premises unless the structure, building, or premises is clean, sanitary, conducive to a safe and healthy environment, and in compliance with all applicable Federal, State, and local laws and ordinances.[146]

The Coon Rapids Code defines family as; Family. (a) An individual, or a group of persons related by blood, marriage, or adoption, including foster children, living together as single housekeeping unit. (b) Residents of a State licensed community residential facility as defined and authorized by State law. (c) A group of not more than six persons who need not be related by blood, marriage, or adoption, living together as a single housekeeping unit.[147]

At this time, there are no restrictions regarding where voucher holders can or cannot live.

Carver County, MN
The Carver County Code defines family as; §152.010 An individual or two or more persons each related by blood, marriage, or adoption living together as a single housekeeping unit or a group of not more than four persons not so related, maintaining a common household and using common cooking and kitchen facilities.[148]
At this time, there are no restrictions regarding where voucher holders can or cannot live.

Dakota County, MN
Dakota County currently has no occupancy code listed in their database.[149]
At this time, there are no restrictions regarding where voucher holders can or cannot live.

Hennepin County

[144] https://www.mhponline.org/publications/state-of-the-state-s-housing-2019#central-region
[145] https://www.anokacounty.us/3411/County-Ordinances
[146] https://library.municode.com/mn/coon_rapids/codes/code_of_ordinances?nodeId=TIT12BU_CH12-300BUMAOCCO
[147] Id.
[148] https://codelibrary.amlegal.com/codes/carvercounty/latest/carverco_mn/0-0-0-3098

[149] https://www.co.dakota.mn.us/LawJustice/Ordinances/Pages/default.aspx

The Hennepin County Code does not define "family". [150] At this time, there are no restrictions regarding where voucher holders can or cannot live.

Bloomington, MN

The Bloomington City Code does not define "family".[151] At this time, there are no restrictions regarding where voucher holders can or cannot live.

Eden Prairie, MN

The Eden Prairie City Code does not define "family".[152] At this time, there are no restrictions regarding where voucher holders can or cannot live.

Minneapolis, MN

The Minneapolis City Code defines family as two (2) or more persons related by blood, marriage, or adoption, including foster children and domestic staff employed on a full-time basis, living together as a permanent household. (520.160).[153] Only one family can occupy an apartment unless permitted & authorized (244.820) At this time, there are no restrictions regarding where voucher holders can or cannot live.

Minnetonka, MN

The Minnetonka Code defines a "family" as; § 300.02 "Family" - any number of individuals living together on the premises as a single housekeeping unit as distinguished from a group occupying a boarding or lodging house, licensed residential care facility, licensed day care facility or community based residential facility.[154] At this time, there are no restrictions regarding where voucher holders can or cannot live.

Plymouth, MN

The Plymouth County Code does not define "family".[155] At this time, there are no restrictions regarding where voucher holders can or cannot live.

Ramsey County, MN

The Ramsey County Code does not define "family".[156] At this time, there are no restrictions regarding where voucher holders can or cannot live.

St. Paul, MN

The St. Paul County Code does not define "family".[157] At this time, there are no restrictions regarding where voucher holders can or cannot live.

Washington County, MN

---

[150] https://www.hennepin.us/your-government#ordinances
[151] https://www.bloomingtonmn.gov/cl/city-charter-and-code-ordinances
[152] https://www.edenprairie.org/home/showdocument?id=89
[153] https://library.municode.com/mn/minneapolis/codes/code_of_ordinances
[154] http://minnetonka-mn.elaws.us/code/coor_ch3_sec300.02
[155] https://www.plymouthmn.gov/departments/administrative-services-/city-clerk/codes-documents
[156] https://www.ramseycounty.us/your-government/ordinances-regulations
[157] https://library.municode.com/mn/st._paul/codes/code_of_ordinances

The Washington County Code does not define "family".[158] At this time, there are no restrictions regarding where voucher holders can or cannot live.

Woodbury, MN
The Woodbury City Code does not define "family".[159] At this time, there are no restrictions regarding where voucher holders can or cannot live.

Scott County, MN
The Scott County Code does not define "family".[160] At this time, there are no restrictions regarding where voucher holders can or cannot live.

Private Discrimination

Private discrimination is very prevalent in the region. The most prevalent discrimination that was reported during community engagement was source of income discrimination, where many landlords throughout the Region outright refuse to accept vouchers. (For more information, see *Contributing Factor: Source of Income Discrimination*). Legal services providers reported that discrimination against voucher holders is also a pretext for racial and disability discrimination. They further reported extensive refusal or resistance on behalf of landlords to provide reasonable accommodations for residents with disabilities related to parking, service animals, and chemical sensitivities. These legal services providers further reported that it is very difficult to obtain reasonable cause findings from the Minnesota Department of Human Rights for even very clear claims of race and sex-based discrimination, and that the Department is "at capacity" for investigating new claims. In manufactured home communities, landlords prey on undocumented Hispanic/Latinx communities in particular by using fear of mixed-status families to enforce unreasonable rules and policies. In addition to landlord discrimination, there are also reports of communities attempting to exclude diverse or low-income families. Carver County Continuum of Care service providers reported a case of a community within the county routinely calling the police on an African American family in an attempt to force them out of the neighborhood.

Quality of Affordable Housing Information Programs

The quality of affordable housing information programs is a contributing factor to fair housing issues in in the Twin Cities region. The Minneapolis Public Housing Authority (MPHA) has a mobility counseling program, the Mobility Voucher Program, which helps families with children move to low-poverty areas in Minneapolis or within the seven-county metro area that includes Minneapolis, St. Paul, and the counties of Hennepin, Carver, Scott, Dakota, Washington, Ramsey, and Anoka.[161] Based on the latest data, the Mobility Voucher program has only served approximately 80 households.[162] The Metropolitan Council's Metro Housing Rental Assistance

[158] https://www.co.washington.mn.us/1259/Ordinances-and-Codes
[159] https://library.municode.com/mn/woodbury/codes/code_of_ordinances?nodeId=CICO_CH12MAHOMAHOPA
[160] https://www.scottcountymn.gov/863/Alphabetical-Listing
[161] PRRAC & Mobility Works, Housing *Mobility Programs in the U.S.*, 2018 https://prrac.org/pdf/mobilityprogramsus2018.pdf
[162] Quadel Consulting and Training, LLC, *Expanding Access to Housing Choice in Minneapolis* (Feb 2017), https://www.fhfund.org/wp-content/uploads/2019/07/Expanding-Access-to-Housing-Choice-in-Minneapolis-Final.pdf

Program has a mobility program called Community Choice that helps families with Housing Choice Vouchers in the Minneapolis/St. Paul region find housing in areas of opportunity.[163]

While there are two mobility counseling programs in the Region, they are understaffed and under resourced and cannot meet the need for expanded access for families to areas of opportunity.

Regulatory Barriers to Providing Housing and Supportive Services for Persons with Disabilities

Regulatory barriers to providing housing and supportive services for persons with disabilities are not a significant contributing factor to fair housing issues for persons with disabilities in the Twin Cities region. This Assessment did not reveal specific regulatory barriers to providing supportive services with the exception of insufficient Home and Community Based Services waiver reimbursement rates for providers, which are addressed in connection with the *State or Local Laws, Policies or Practices That Discourage Individuals with Disabilities from Living in Apartments, Family Homes, Supportive Housing and Other Integrated Settings C*ontributing Factor.

Siting Selection Policies, Practices, and Decisions for Publicly Supported Housing, Including Discretionary Aspects of Qualified Allocation Plans and Other Programs

Siting selection policies, practices, and decisions for public supported housing, including discretionary aspects of Minnesota's Qualified Allocation Plans (QAP) and other programs are a contributing factor to fair housing issues. One of the scoring criteria of the 20201 QAP is access to fixed transit; projects within one-half mile of a planned or existing LRT, BRT, or commuter rail station.[164] Access to transportation is very uneven throughout the Region, and disproportionately White areas, which tend to have more proficient schools and better environmental health, tend to have limited access to transportation. When real affordability is built into transit-oriented development, these investments may have a positive effect on stable integration in areas undergoing gentrification by arresting the process of displacement; however, transit expansion to higher opportunity areas may be necessary to ensure that prioritizing transit-oriented development contributes to integration.

The Minnesota Housing's QAP also incentivizes economic integration, projects located in higher income communities with access to low and moderate wage jobs. The map below shows which communities are eligible for these economic integration points in the Twin Cities region. To meet the criteria, the proposing housing is required to be in a census tract with a family income that meets or exceeds the region's income. Seven points are awarded for census tracts at or above the 40th percentile and nine points are awarded for census tracts at or above the 80th percentile. For each region, the 40 percent of census tracts with the lowest incomes are excluded from receiving points, including the R/ECAPs that are outlined on the map.

[163] Ibid.
[164] http://www.mnhousing.gov/sites/multifamily/taxcredits

The Minneapolis QAP preference provides twenty points to projects located outside areas of concentrated poverty and the St Paul QAP preference provides ten points.[165]

The Dakota County QAP provides up to five bonus points for projects located in a Qualified Census Tract (QCT) and are part of a cooperatively developed plan that provides for community Revitalization.[166] QCTs have 50 percent of households with incomes below 60 percent of the Area Median Gross Income (AMGI) or have a poverty rate of 25 percent or more.[167] Therefore, Dakota County incentives projects in low-income communities of color.

Washington County provides bonus points for projects located in higher income communities and close to employment and public transportation.[168]

[165] https://www.stpaul.gov/sites/default/files/Media%20Root/Planning%20%26%20Economic%20Development/2021-LIHTC-Qualified-Allocation-Plan.pdf

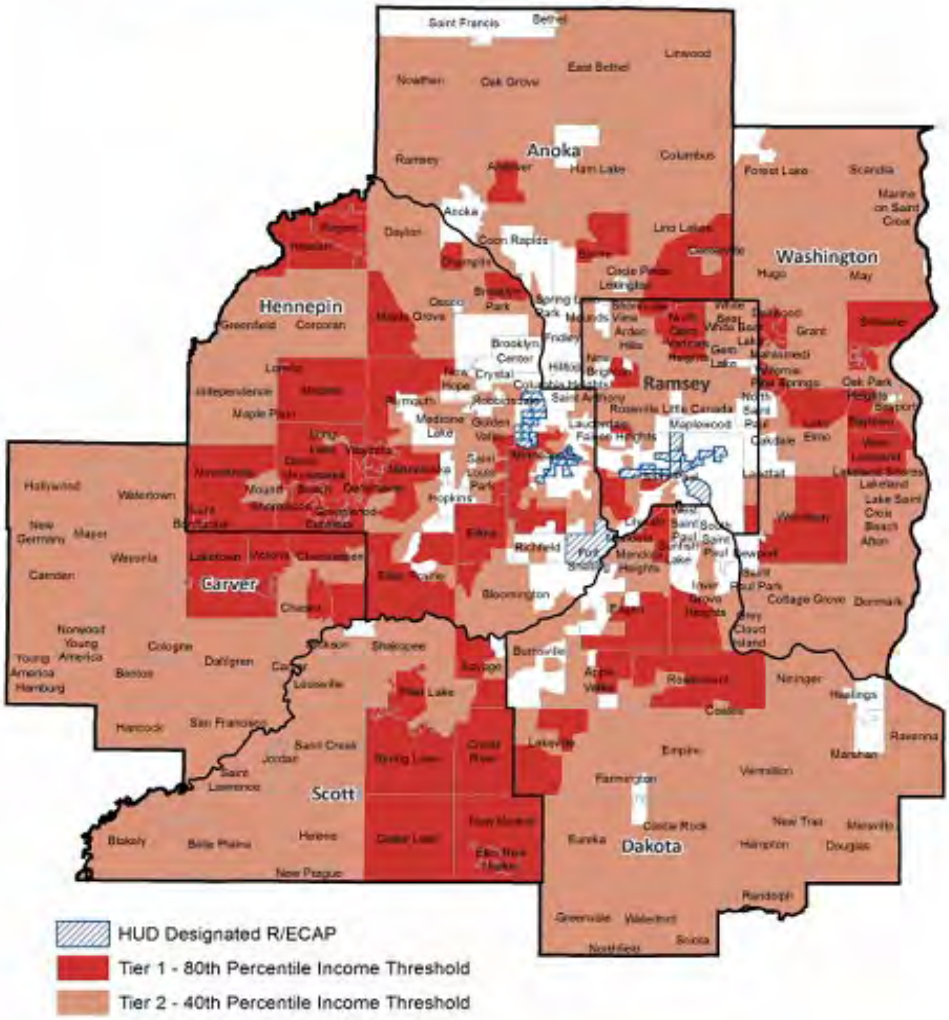
[166] https://www.dakotacda.org/wp-content/uploads/2019/02/DRAFT-2020-changes-tracked_2019-Qualified-Allocation-Plan.pdf

[167] https://www.huduser.gov/portal/datasets/qct.html

[168] https://www.dropbox.com/sh/mhq9iq4od6qpi5q/AACPcqUuGI3QJzx6yHd9YsD6a?dl=0&preview=2021+and+2022+WCCDA+Scoring+Worksheet.xlsx.

MAP 2 – TWIN CITIES 7-COUNTY METROPOLITAN AREA DETAIL - CENSUS TRACTS MEETING REGION'S 40TH AND 80TH PERCENTILE THRESHOLDS FOR MEDIAN INCOME

	Twin Cities 7-County Metropolitan Area
Med Family Income / 40th percentile	$82,108
Med Family Income / 80th percentile	$120,063



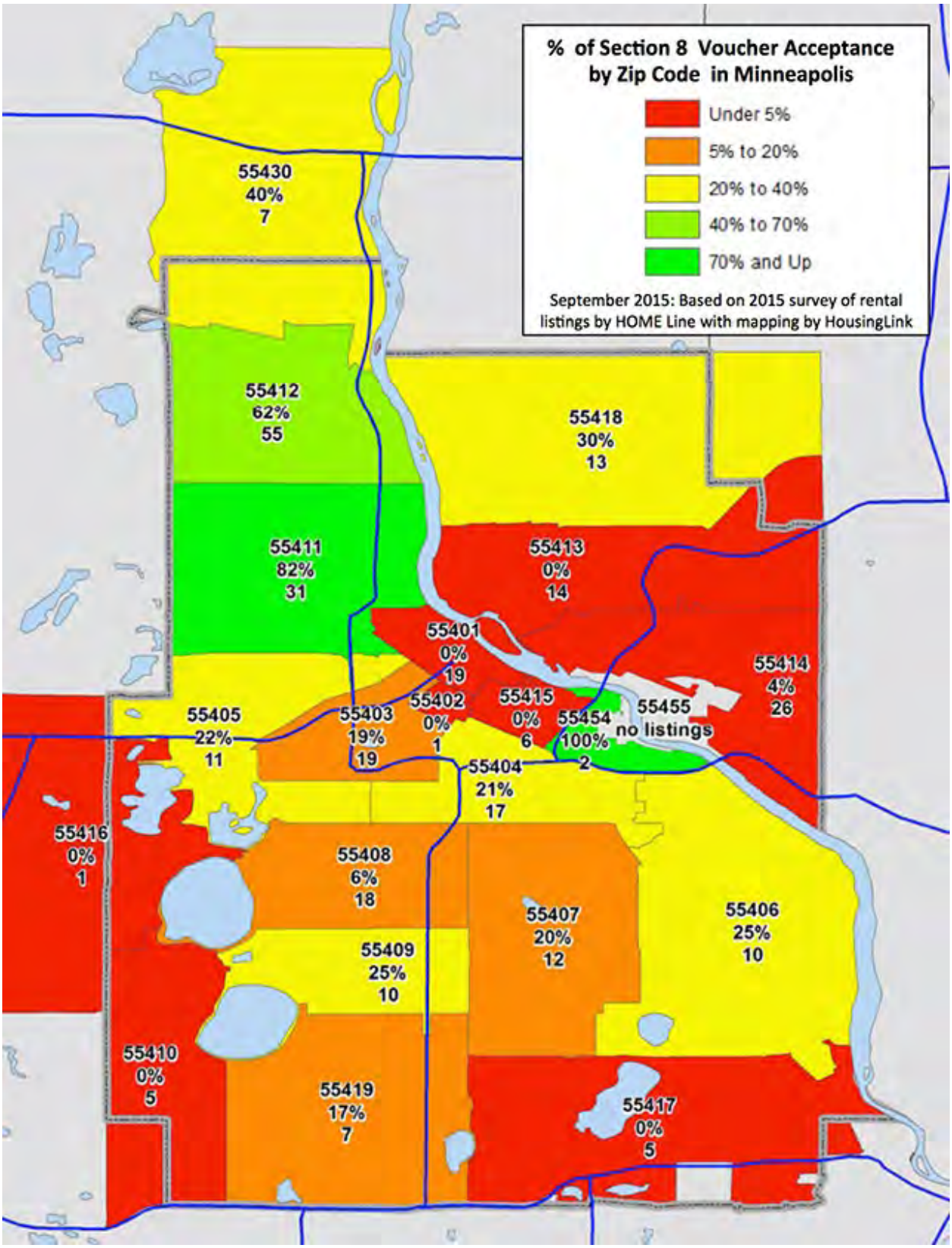
Source of Income Discrimination

Source of income discrimination is a significant contributing factor to fair housing issues in the Twin Cities region. Minneapolis is the only city in the state with source-of-income discrimination protection for housing choice voucher holders. The State of Minnesota passed source of income discrimination in 1990, but this was overruled in Edwards v. Hopkins Plaza Ltd. Partnership, 783 N.W.2d 171 (Minn. App., 2010). The Court of Appeals held that participation in Section 8 programs was voluntary and thus it is not "unlawful for property owners to either refuse to rent, or refuse to continue renting, to tenant-based Section 8 recipients based on a legitimate business decision not to participate in Section 8 programs."[169] A similar legal challenge was brought by Fletcher Properties against the City of Minneapolis after its city council adopted amendments to Title 7 of the Minneapolis Code of Ordinances in December 2017 that prohibited source of income discrimination. In 2018, a district court judge struck down the ordinance, but in 2019, the Minnesota Court of Appeals ruled in favor of the city of Minneapolis, allowing it to enforce the ordinance.[170] Fletcher Properties filed an appeal that is pending before the Minnesota Supreme Court.

During community engagement, several legal and other service providers reported extensive source of income discrimination. Public Housing Authorities reported that lack of landlord acceptance is one of the factors in voucher holders being unable to find housing for months after receiving one. In addition to many landlords throughout the region outright refusing to accept vouchers, many will also intentionally set rent prices higher than voucher payment standards, or require three months' rent up front to prevent low-income families from being able to rent the unit. Beyond preventing voucher holders from obtaining housing in areas of opportunity, source of income discrimination forces voucher holders in to less desirable and unsafe housing. Local and/or statewide source of income protections should be implemented to improve access to housing for households with vouchers.

The map below of the Housing Choice Voucher acceptance rate in Minneapolis illustrates the significant impact of lack of statewide source of income protections have on the ability of voucher holders to move to areas of opportunity.[171]

[169] Edwards v. Hopkins Plaza Ltd. Partnership, 783 N.W.2d 171 (Minn. App., 2010).
[170] Fletcher Properties, Inc., et al., Appellants vs. City of Minneapolis, Respondent
Case Number: A18-1271. Filed June 10, 2019.
[171] Peter Callaghan, "Minneapolis landlords push back on housing discrimination proposal,"*MinnPost*,May 13, 2016. https://www.minnpost.com/politics-policy/2016/05/minneapolis-landlords-push-back-housing-discrimination-proposal/


% of Section 8 Voucher Acceptance by Zip Code in Minneapolis
Under 5%
5% to 20%
20% to 40%
40% to 70%
70% and Up
September 2015: Based on 2015 survey of rental listings by HOME Line with mapping by HousingLink
55430 40% 7
55412 62% 55
55418 30% 13
55411 82% 31
55413 0% 14
55401 0% 19
55414 4% 26
55405 22% 11
55403 19% 19
55402 0% 1
55415 0% 6
55454 100% 2
55455 no listings
55404 21% 17
55416 0% 1
55408 6% 18
55407 20% 12
55406 25% 10
55409 25% 10
55410 0% 5
55419 17% 7
55417 0% 5

State or Local Laws, Policies or Practices That Discourage Individuals with Disabilities from Living in Apartments, Family Homes, Supportive Housing and Other Integrated Settings

State or local laws, policies or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, and other integrated settings are a significant contributing factor to fair housing issues for persons with disabilities in the Twin Cities region. As discussed in the Disability and Access section of this Assessment, the Minnesota Department of Human Services' own research has shown low wages and high rates of employee turnover among staff who work directly with individuals with Home and Community Based Services waivers. This is, in part, a product of provider reimbursement rates that are too low to meet the full cost of providing robust home and community-based services. Inconsistent staffing can destabilize individuals' tenure in the community, and inadequate rates can incentivize providers to support a less integrated group home model over truly independent living because of economies of scale.

Unresolved Violations of Fair Housing or Civil Rights Law

Unresolved violations of fair housing law are not a contributing factor in the region. Both recent fair housing lawsuits filed against jurisdictions in this analysis have been resolved via satisfaction of the conditions of consent decrees or voluntary compliance agreements. There are no other fair housing related suits that are outstanding. There is an unresolved allegation of violations of civil rights law, namely, Title VII. The only pending lawsuit is related to a transgender student's use of a bathroom in the Anoka-Hennepin School district. This same school district was recently under a four-year consent decree to correct harassment for students who do not conform to gender stereotypes.

B. Data Documentation Appendix

The data in this document was intended to replicate and update the Affirmatively Furthering Fair Housing Data and Mapping Tool (AFFH-T) Data for the Twin Cities Region.[172] This appendix is heavily adapted from the AFFH-T Data Documentation. Where possible, formulas from this document were left intact and the years for the data sources were updated instead. Exceptions to this are also noted below.

Demographic Summary

All data in the Demographic Summary section is sourced from American Community Survey, 2013-2017 Estimates. Trends data is sourced from the HUD tool, which is taken from the 1990, 2000, and 2010 Decennial Censuses.

Data Source: American Community Survey (ACS) 2013-2017; Decennial Census, 1990, 2000, and 2010.

Segregation/Integration

Data in this section is sourced from American Community Survey and the Brown Longitudinal Tract Database (LTDB) (originally from Decennial Census, 1990, 2000, and 2010). All current race/ethnicity, national origin and housing tenure data have been updated to 2013-2017 ACS Estimates. Index values measuring segregation are based on formulas from the Census's Measures of Residential Segregation.[173] Past index values are from LTDB, while current index values are based on ACS data.

Data Source: American Community Survey (ACS) 2013-2017; Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on Decennial Census data, 1990, 2000, and 2010.

[172] https://files.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-(AFFHT0004a)-March-2018.pdf
[173] https://www.census.gov/hhes/www/housing/resseg/pdf/app_b.pdf

Dissimilarity Index[174]

1. Dissimilarity Index

Summary

The dissimilarity index (or the index of dissimilarity) is a commonly used measure of community-level segregation. The dissimilarity index represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups. It is calculated as:

$$D_j^{WB} = 100 * \frac{1}{2} \sum_{i=1}^{N} \left| \frac{W_i}{W_j} - \frac{B_i}{B_j} \right|$$

Where i indexes census block groups or tracts, j is the jth jurisdiction, W is group one and B is group two, and N is the number of block groups or tracts i in jurisdiction j.

Interpretation

The values of the dissimilarity index range from 0 to 100, with a value of zero representing perfect integration between the racial groups in question, and a value of 100 representing perfect segregation between the racial groups. The following is one way to understand these values:

Measure	Values	Description
Dissimilarity Index	<40	Low Segregation
[range 0-100]	40-54	Moderate Segregation
	>55	High Segregation

Isolation Index

Summary

The Isolation Index measures "measures the extent to which minority members are exposed only to one another and is computed as the minority-weighted average of the minority proportion in each area."[175] In the formula below, n = the number of tracts in the jurisdiction, x_i = the group population in tract i, X = the total population of the group in the jurisdiction, and t_i = the total population of a tract.

$$\sum_{i=1}^{n} \left[\left(\frac{x_i}{X} \right) \left(\frac{x_i}{t_i} \right) \right]$$

Interpretation

The higher the isolation value, the more isolated the group is to other groups. A higher isolation value indicates higher levels of segregation.

[174] This screenshot was taken from the AFFH-T documentation (footnote 1). Screenshots for the Isolation and Exposure Indices were taken from the Measures of Residential Segregation document (footnote 2).
[175] https://www.census.gov/hhes/www/housing/resseg/pdf/app_b.pdf

Exposure Index

Summary

The Exposure (also known as Interaction) Index measures "the probability[y] that a minority person shares a unit area with a majority person or with another minority person."[176] In the formula below, n = the number of tracts in the jurisdiction, x_i = the group population in tract i, X = the total population of the group in the jurisdiction, y_i = the population of another group in tract i, and t_i = the total population of a tract.

$$\sum_{i=1}^{n}\left[\left(\frac{x_i}{X}\right)\left(\frac{y_i}{t_i}\right)\right]$$

Interpretation

The higher the exposure value, the more exposure one group has to another. Higher exposure values indicate lower levels of segregation.

Racially or Ethnically Concentrated Areas of Poverty

Racially or Ethnically Concentrated Areas of Poverty (hereafter referred to as R/ECAPs) indicate areas in a jurisdiction which have both higher concentrations of minority groups and higher poverty levels. The formula below indicates the threshold used for the Twin Cities Region to determine if a census tract qualifies as a R/ECAP: a tract must have a non-White population of 50% or higher, and a poverty rate of above 40%.

$$\frac{R}{ECAP_i} = yes \ldots if \ldots \begin{cases} PovRate_i \geq 0.4 & \cap \left[\frac{(Pop_i - NHW_i)}{Pop_i}\right] \geq 0.50 \end{cases}$$

Current maps have been updated to reflect R/ECAPs and current compositions of tracts based on ACS 2013-2017 Estimates, but trends maps are taken directly from the AFFH-T tool.

Data Source: American Community Survey (ACS) 2013-2017; Decennial Census, 2010; Brown Longitudinal Tract Database (LTDB) based on Decennial Census data, 1990, 2000, and 2010.

[176] https://www.census.gov/hhes/www/housing/resseg/pdf/app_b.pdf

Disproportionate Housing Needs

All data in the Disproportionate Housing Needs section is taken directly from HUD's Comprehensive Housing Affordability Strategy (CHAS) figures, unless otherwise indicated. This data is based on custom tabulations of American Community Survey data. The latest data available, which is used in this document, is CHAS 2012-2016 5-year average data.

The maps in this section indicate the percentage of households in a tract experiencing housing problems. Race/ethnicity and national origin overlays based on ACS 2013-2017 Estimates are also used.

Data Source: Comprehensive Housing Affordability Strategy (CHAS), 2013-2017; American Community Survey (ACS) 2013-2017.

Disparities in Access to Opportunity

The data in this section is the biggest departure from the data used in the HUD AFFH-T documentation. The reasons for this vary – some data sources were unable to be updated, were no longer available, or would need to be calculated for the entire nation to be scaled in the same way. As a result, some values were scaled to the Region. The Low Poverty Index was intentionally omitted from this analysis due to redundancies with the R/ECAPs section.

School Proficiency

This index uses data from the Minnesota Report Card and Minnesota Geospatial Commons. School Proficiency Index values average the percentages of fourth-grade students proficient in math and reading, respectively. In the formula below, m_i = the percentage of students proficient in math in a school district, and r_i = the percentage of students proficient in reading in a school district.

$$s_i = \frac{1}{2} m_i + \frac{1}{2} r_i$$

Data limitations meant that the smallest unit possible for which to determine an index value was the school district, rather than the census tracts used in other indices.

Data Sources: 2019 Minnesota Report Card; Minnesota Geospatial Commons; 2013-2017 ACS Estimates.

Environmental Health Index

The Environmental Health Index averages respiratory and neurological and for a given tract, which are then scaled to the entire Region. In the formula below, r_i = respiratory risk, scaled 0-100 for the Region and n_i = neurological risk, scaled 0-100 for the Region.

$$environhealth_i = 100 - \frac{1}{2}r_i + \frac{1}{2}n_i$$

A higher index value indicates higher levels of environmental health for a tract, based on these factors.

Data Sources: National Air Toxics Assessment (NATA) data, 2014; 2013-2017 ACS Estimates.

Labor Market Engagement

The Labor Market Engagement Index measures the relative strength of labor market engagement, based on the unemployment rate and labor-force participation rate. In the formula below, u_i = the unemployment rate and l_i = the labor-force participation rate. This formula intentionally omits the percent of population with a bachelor's degree or higher, which was included in the original HUD AFFH-T data, because, although a meaningful indicator of social capital, the inclusion of educational attainment in the Labor Market Engagement Index is not intuitive and has the potential to confuse readers. This index was not scaled for the Region.

$$labormarketengagement_i = (-1 * u_i) + l_i$$

A higher index value indicates stronger labor market engagement.

Data Sources: 2013-2017 ACS Estimates.

Low Transportation Cost

This index scales transportation costs for a 3-person, single-parent family at 50% AMI. A higher index value indicates lower transportation costs.

Data Source: Location Affordability Index (LAI) data, Version 3.0 (based on 2012-2016 ACS Estimates); 2013-2017 ACS Estimates.

Transit Trips

This index scales the number of transit trips taken by a 3-person, single-parent family at 50% AMI. A higher index value indicates a higher number of transit trips.

Data Source: Location Affordability Index (LAI) data, Version 3.0 (based on 2012-2016 ACS Estimates); 2013-2017 ACS Estimates.

Computing Indices by Protected Class[177]

The AFFH-T provides index values documenting the extent to which members of different racial or ethnic groups have access or exposure to particular opportunity indicators. The AFFH-T provides a weighted average for a given protected characteristic. The generic access for subgroup M to asset dimension R in jurisdiction j is calculated as:

$$Index_M^R = \sum_i^N \frac{M_i}{M_j} * R_i$$

Where i indicates Census tracts in jurisdiction j for subgroup M to dimension R. N is the total number of Census tracts in jurisdiction j.

It is useful to provide an example of this in practice (Table 2). Consider Jurisdiction X with a total of three neighborhoods (A, B, and C). Each neighborhood has an index score representing the prevalence of poverty within that neighborhood (Column 1), with higher values representing lower levels of poverty. To compute the index value for a particular protected class, such as White or Black individuals, the values are weighted based on the distribution of that subpopulation across the three neighborhoods. For example, 40% of the jurisdiction's White population lives in neighborhood A, so the index value for neighborhood A represents 40% of the composite index value for the White population in the jurisdiction. The values for neighborhoods B and C are weighted at 40% and 20% respectively, based on the share of White individuals living in those neighborhoods, leading to a final weighted low poverty index for the White population in the jurisdiction of 56.

	Dimension	White			Black		
Neighborhood	Low Poverty Index	white pop	%white of total pop	Index for whites [(1)*(3)]	black pop	%black of total pop	Index for blacks [(1)*(6)]
A	80	400	40%	32	100	20%	16
B	50	400	40%	20	150	30%	15
C	20	200	20%	4	250	50%	10
Total		1000	100%	**56**	500	100%	**41**

Disability

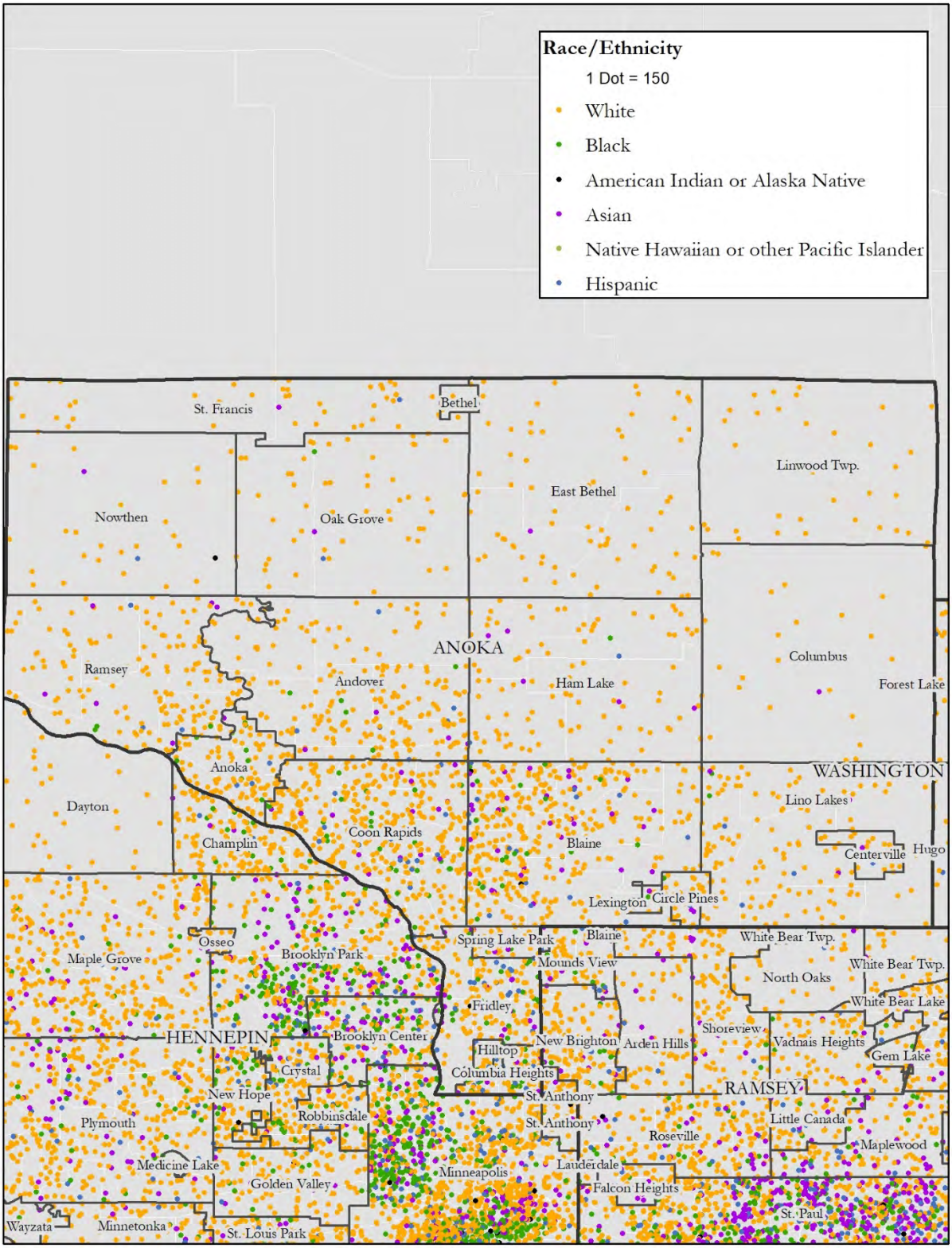
All data in the Disability section is sourced from American Community Survey, 2013-2017 Estimates, unless otherwise indicated.

Data Source: American Community Survey (ACS) 2013-2017.

[177] This screenshot was taken from the AFFH-T documentation (footnote 1).

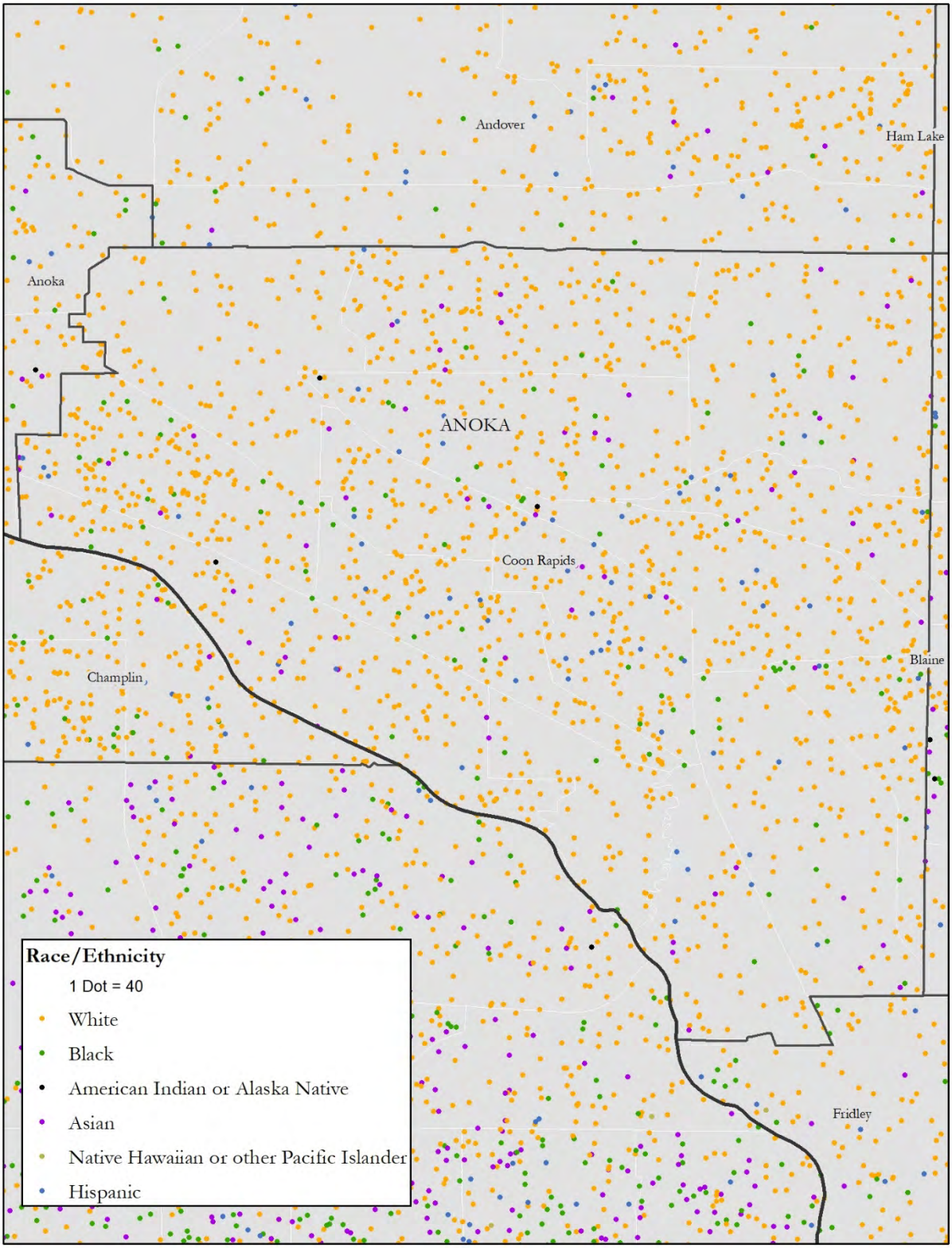
C. Segregation/Integration Appendix

Map 1: Race/Ethnicity, Anoka County[178]



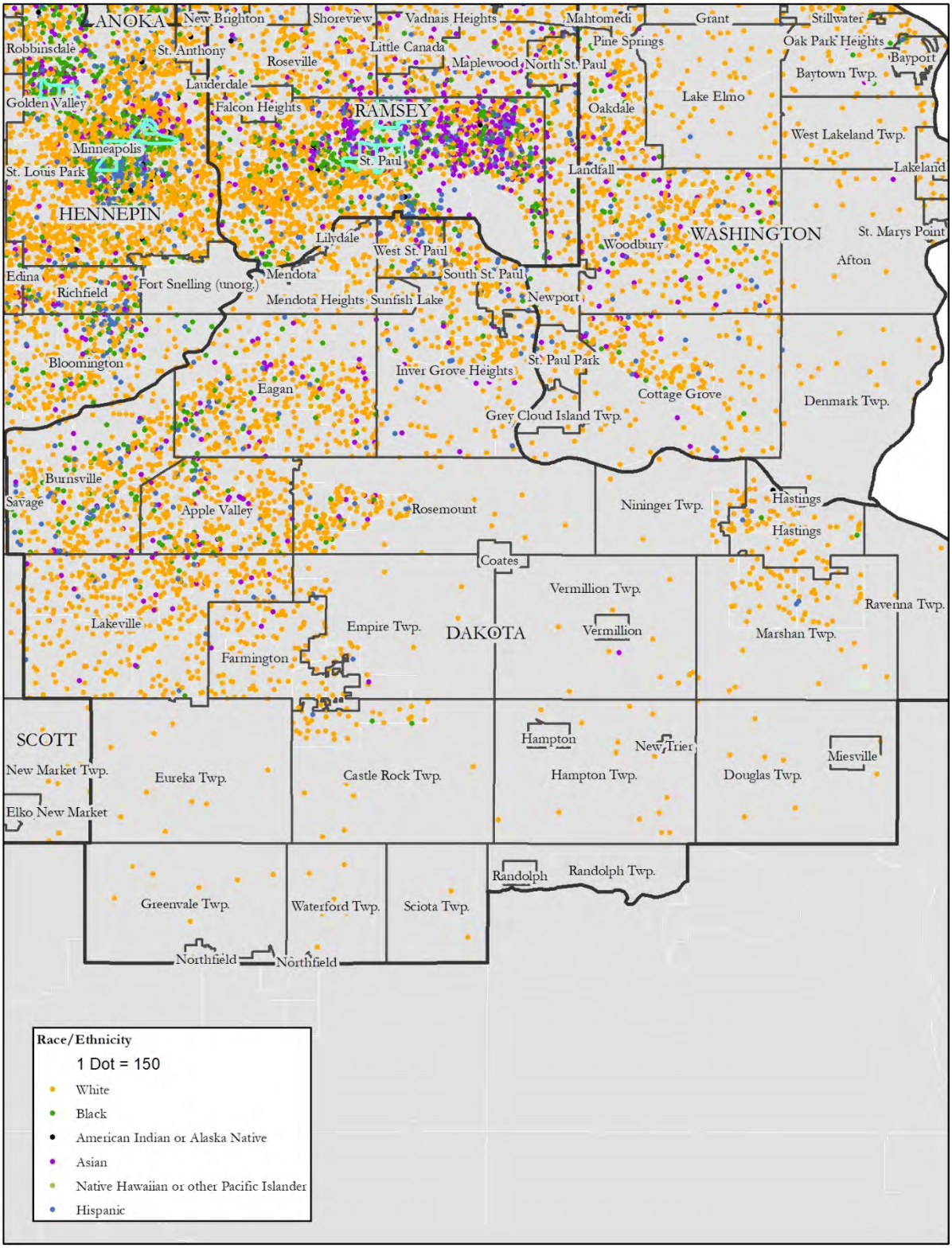
[178] *American Community Survey Estimates, 2013-2017.*

Map 2: Race/Ethnicity, Coon Rapids[179]



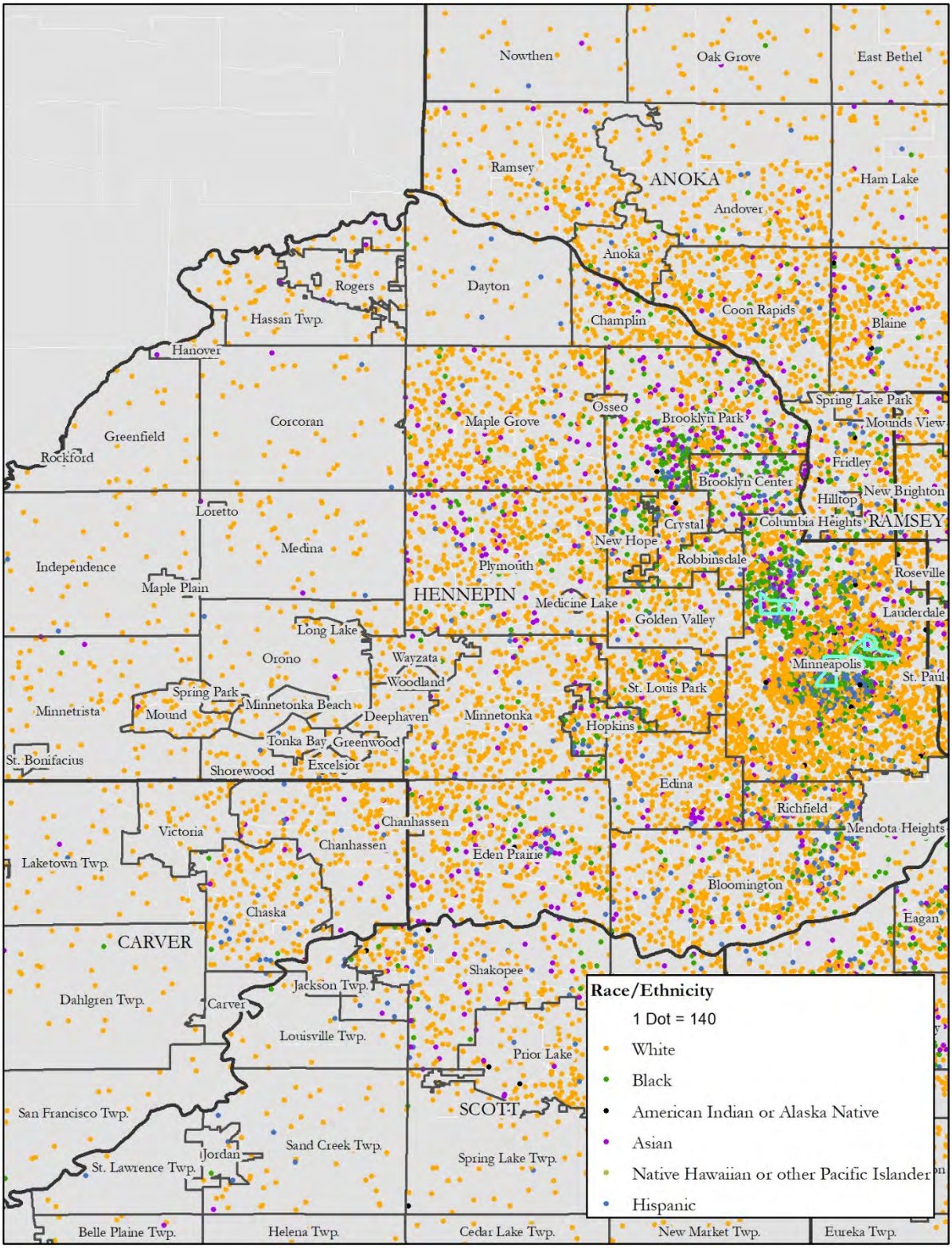
[179] *American Community Survey Estimates, 2013-2017.*

Map 3: Race/Ethnicity, Dakota County[180]



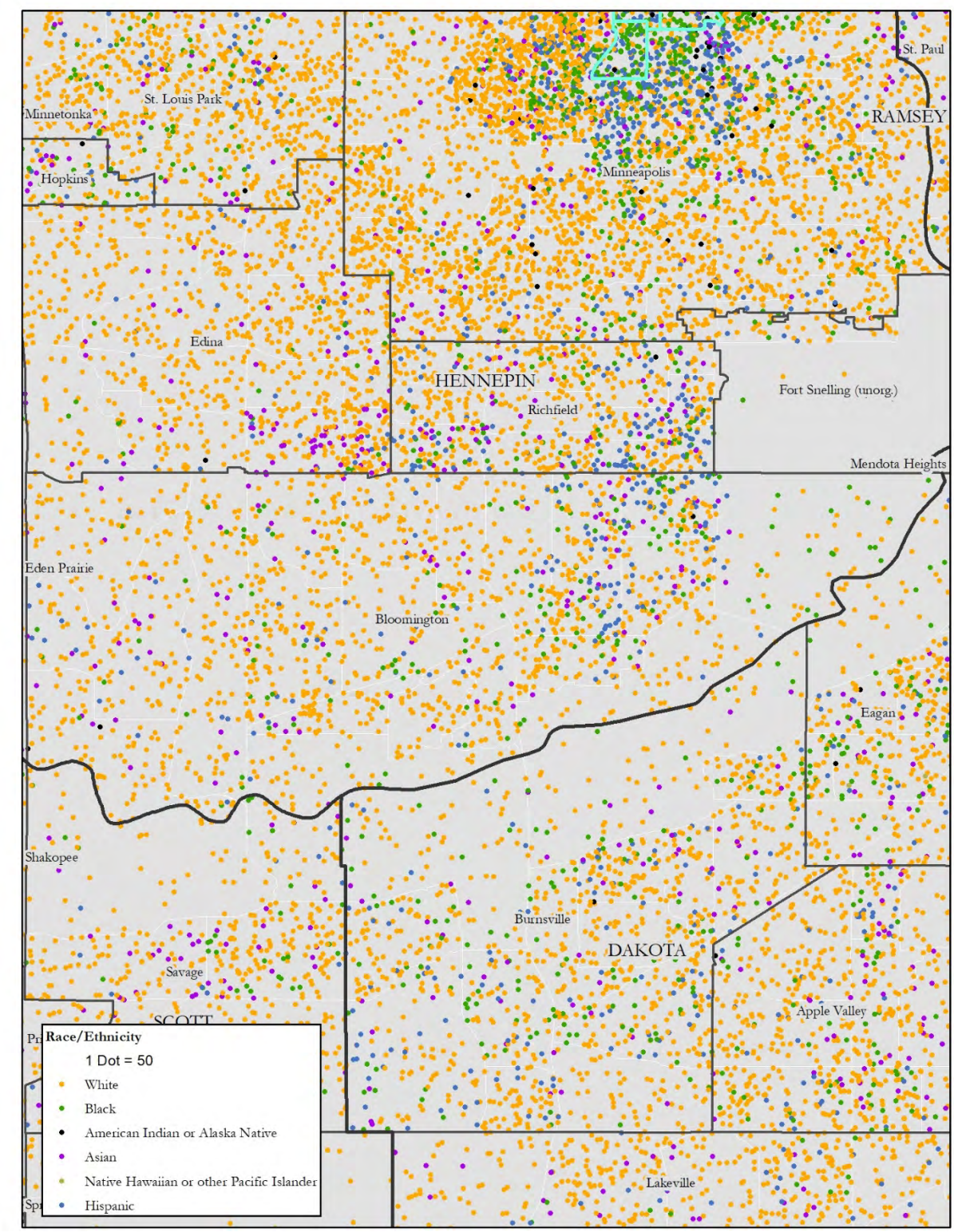
[180] *American Community Survey Estimates, 2013-2017.*

Map 4: Race/Ethnicity, Hennepin County[181]



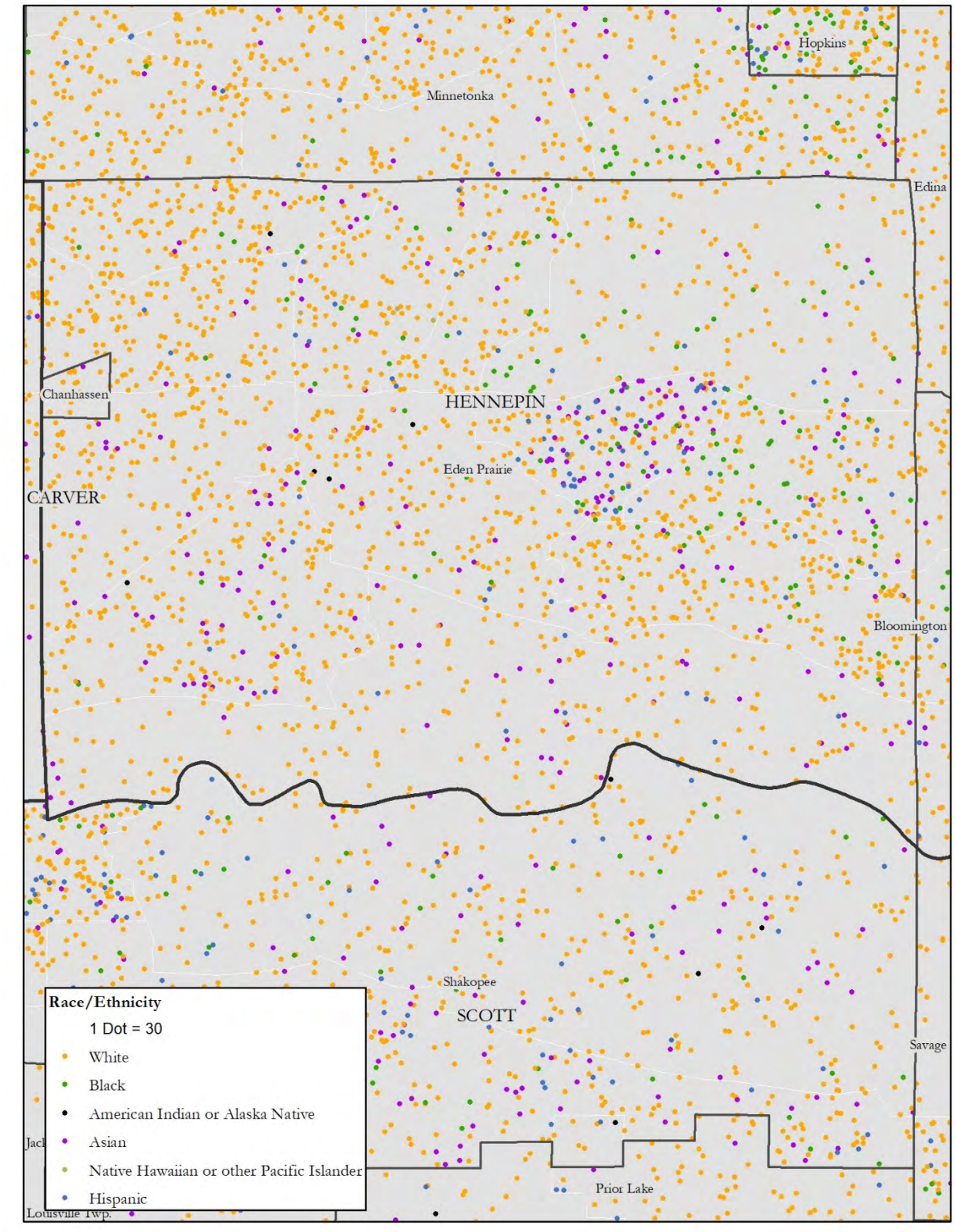
[181] *American Community Survey Estimates, 2013-2017.*

Map 5: Race/Ethnicity, Bloomington[182]



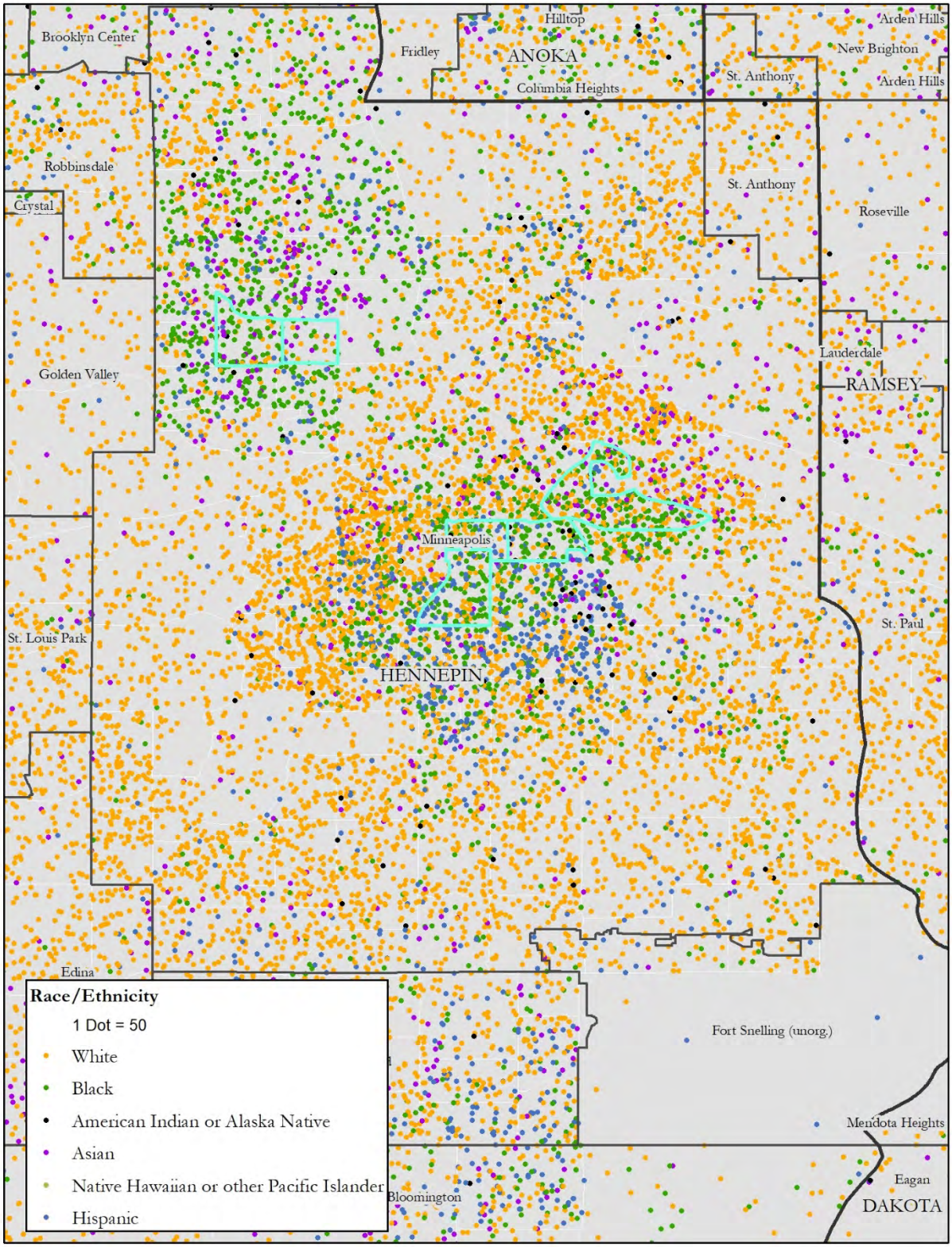
[182] *American Community Survey Estimates, 2013-2017.*

Map 6: Race/Ethnicity, Eden Prairie[183]



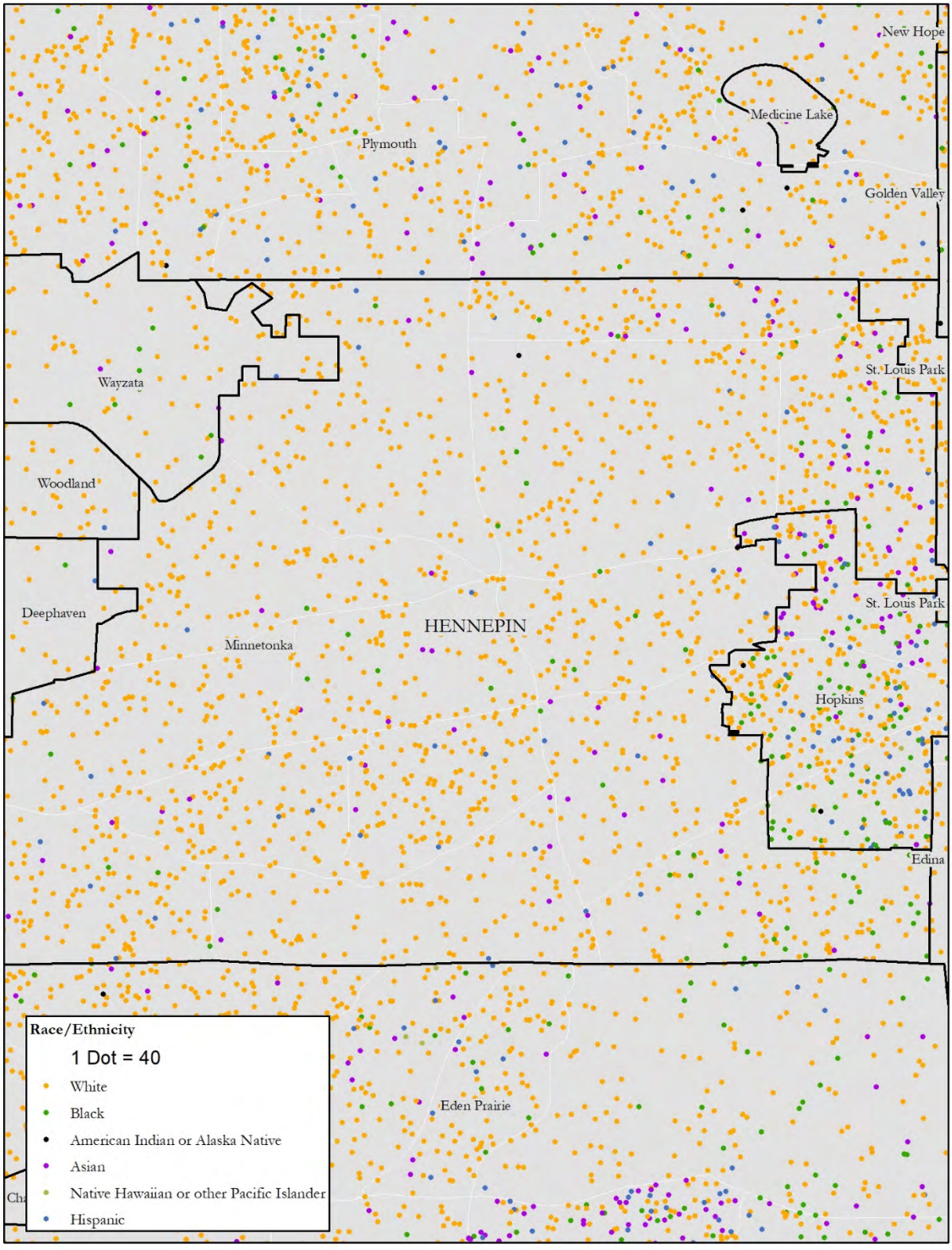
[183] *American Community Survey Estimates, 2013-2017.*

Map 7: Race/Ethnicity, Minneapolis[184]



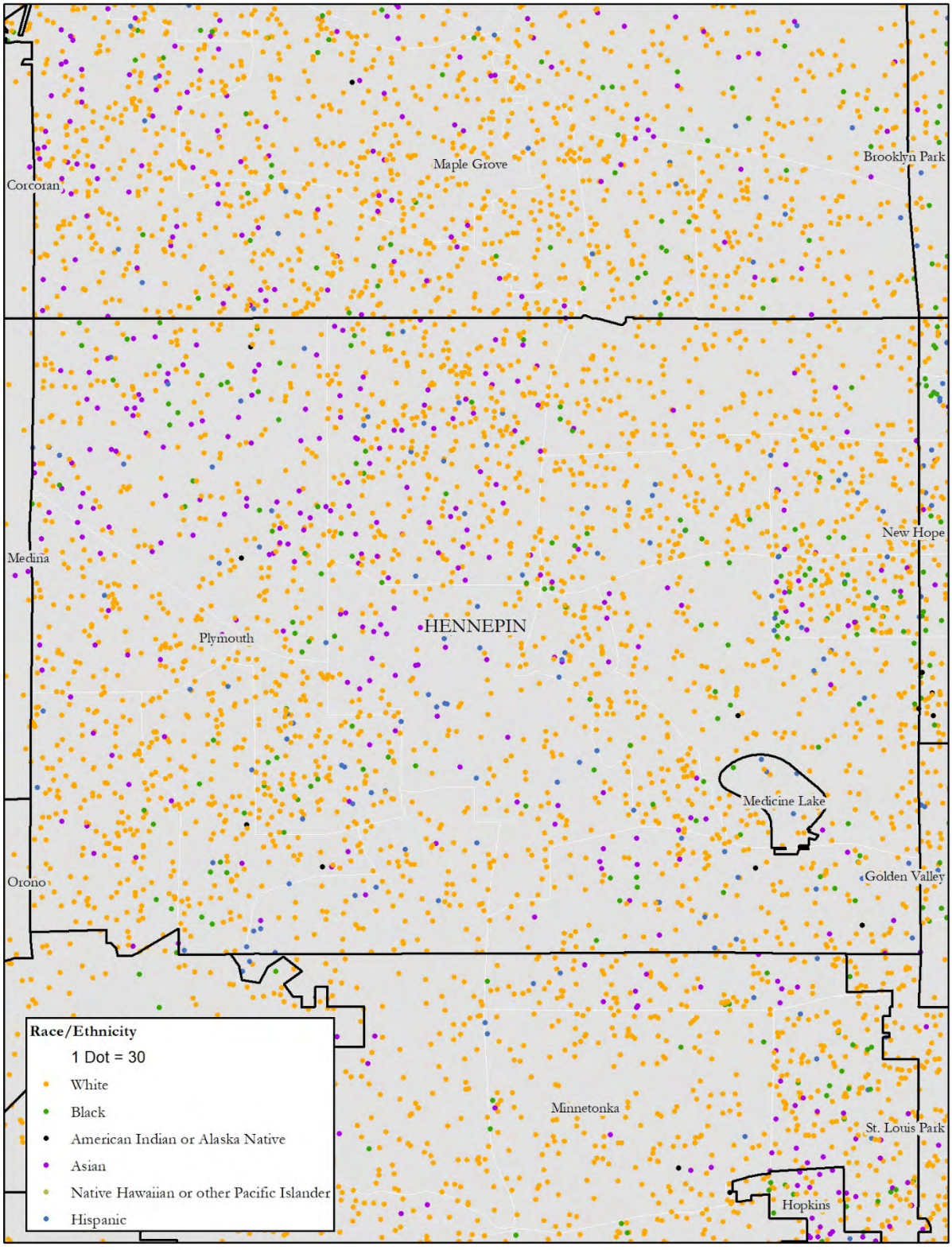
[184] *American Community Survey Estimates, 2013-2017.*

Map 8: Race/Ethnicity, Minnetonka[185]



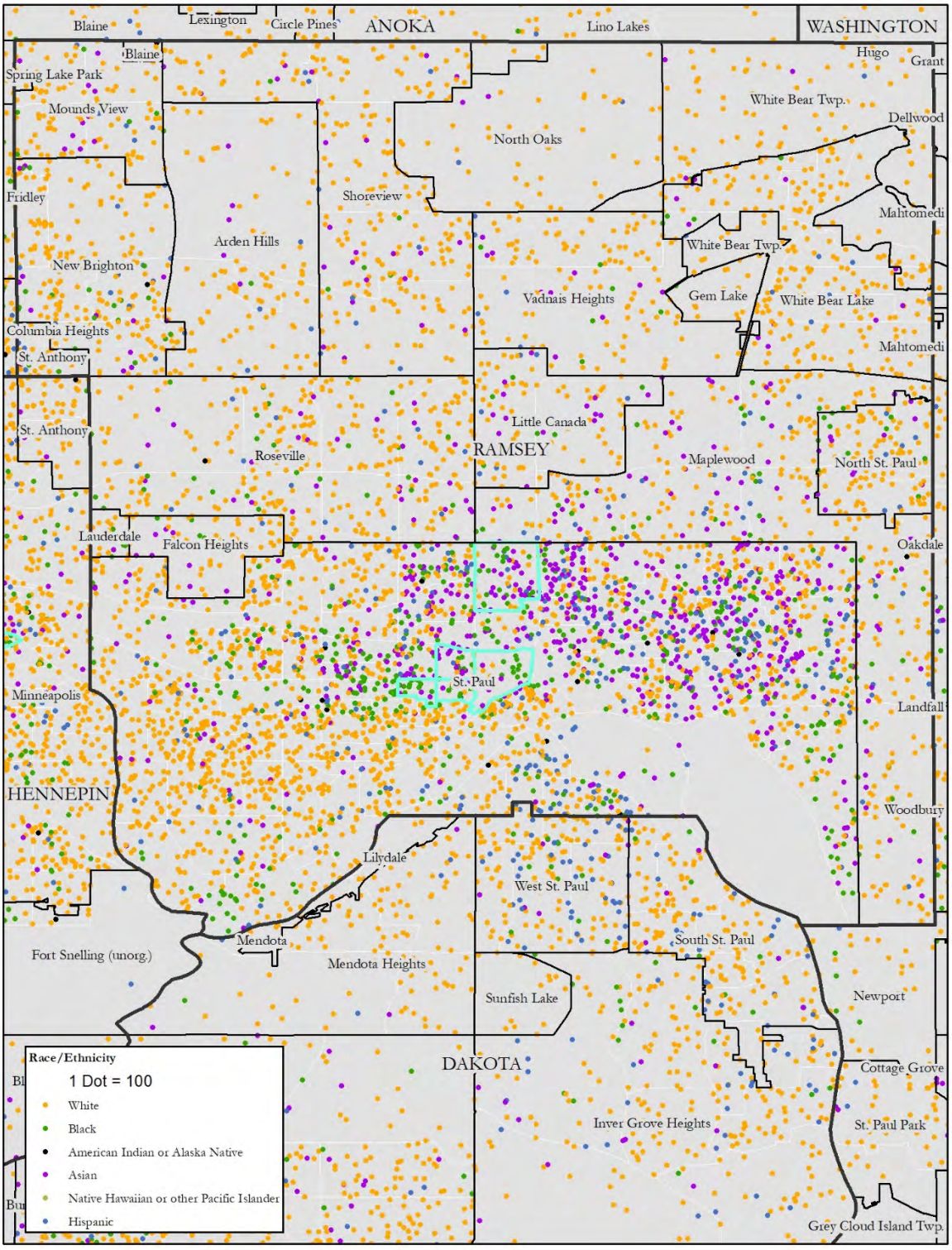
[185] *American Community Survey Estimates, 2013-2017.*

Map 9: Race/Ethnicity, Plymouth[186]



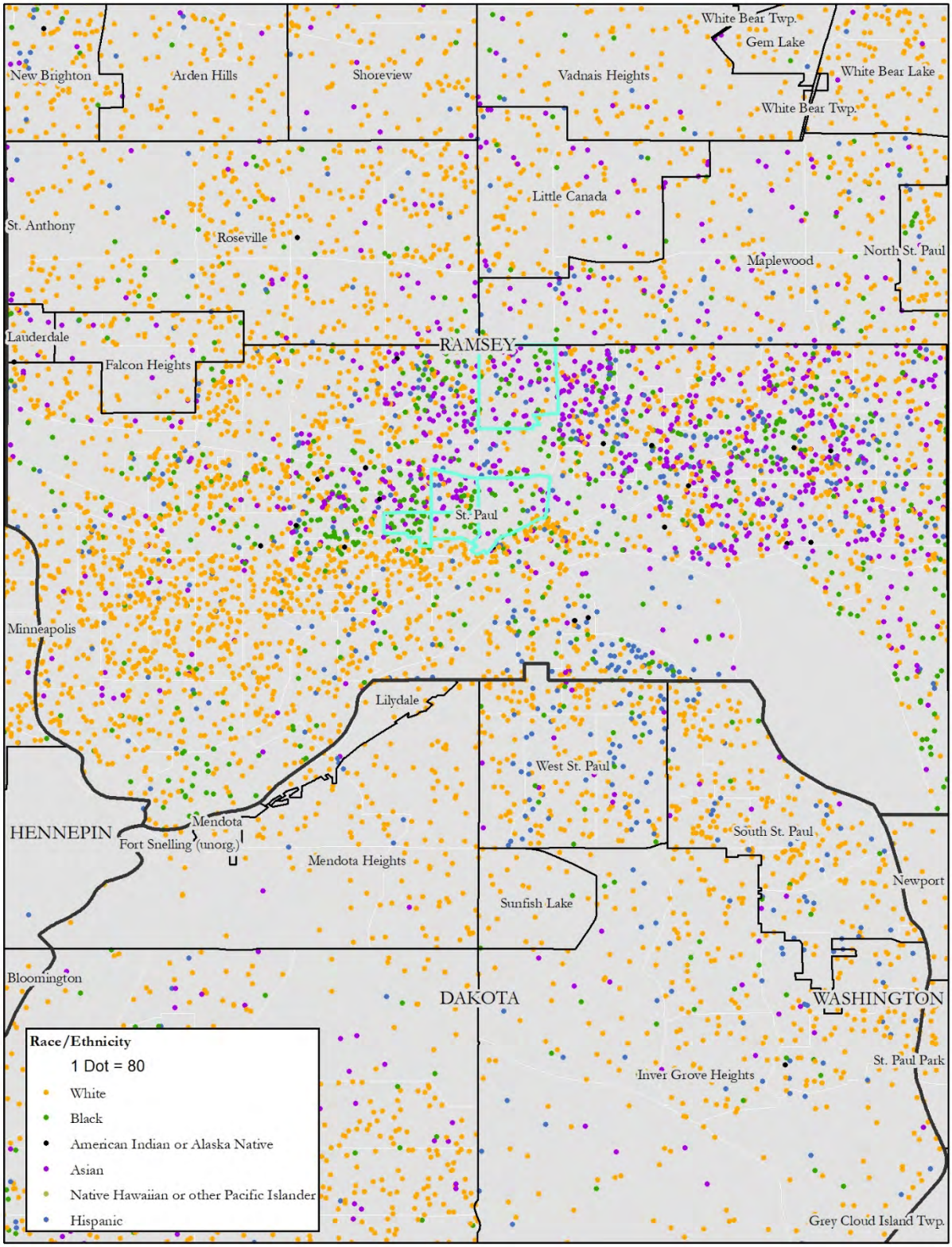
[186] *American Community Survey Estimates, 2013-2017.*

Map 10: Race/Ethnicity, Ramsey County [187]



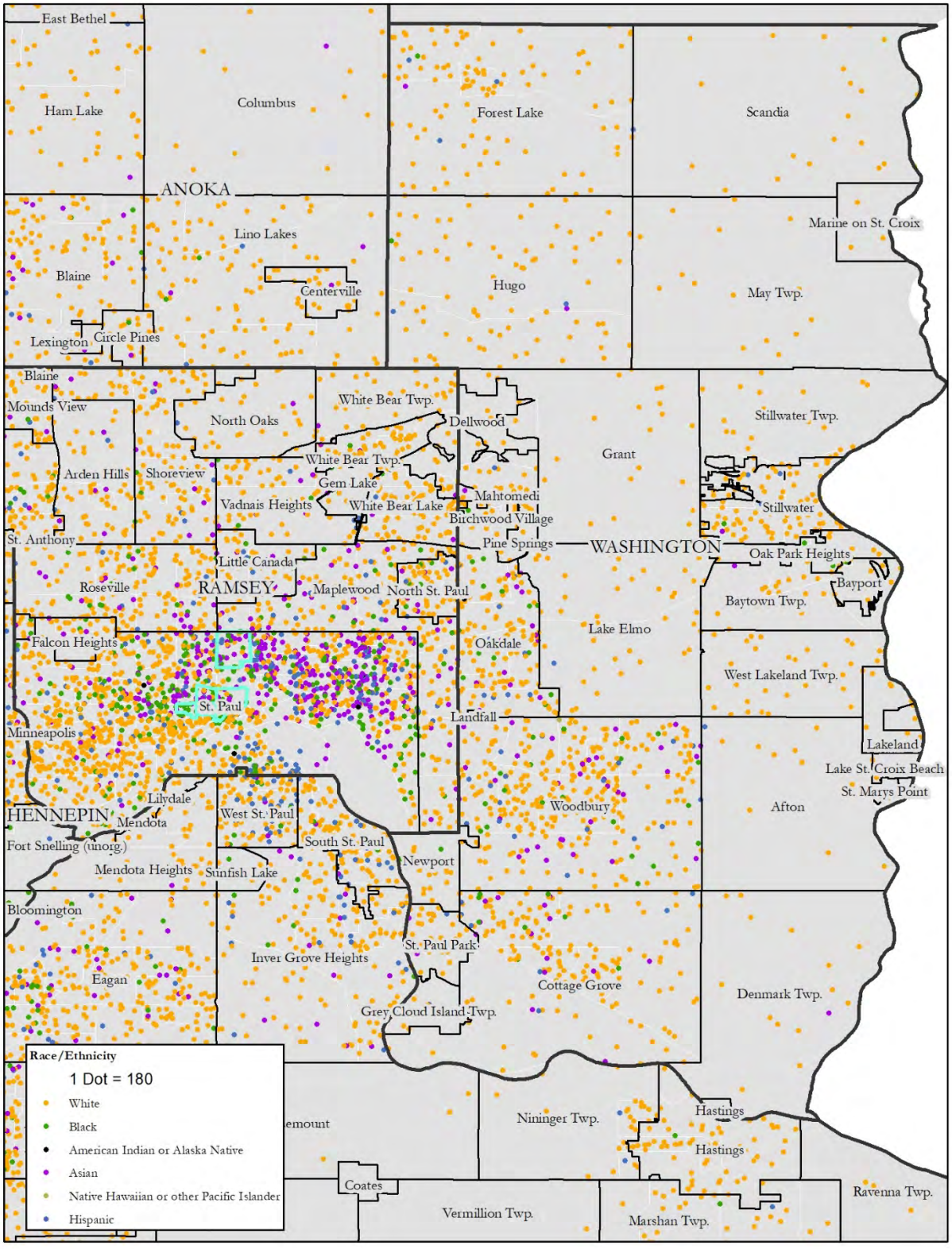
[187] *American Community Survey Estimates, 2013-2017.*

Map 11: Race/Ethnicity, St. Paul[188]



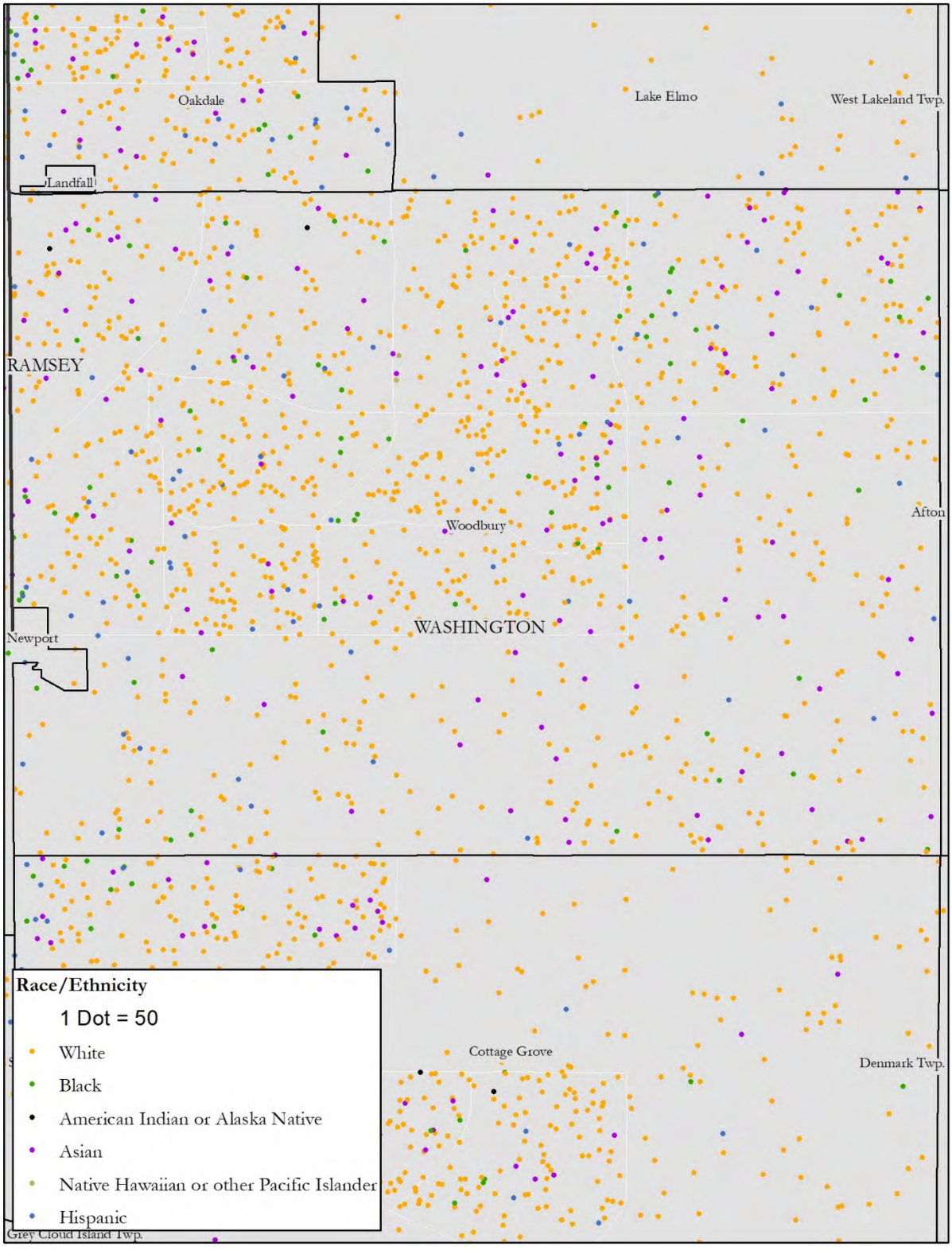
[188] *American Community Survey Estimates, 2013-2017.*

Map 12: Race/Ethnicity, Washington County[189]



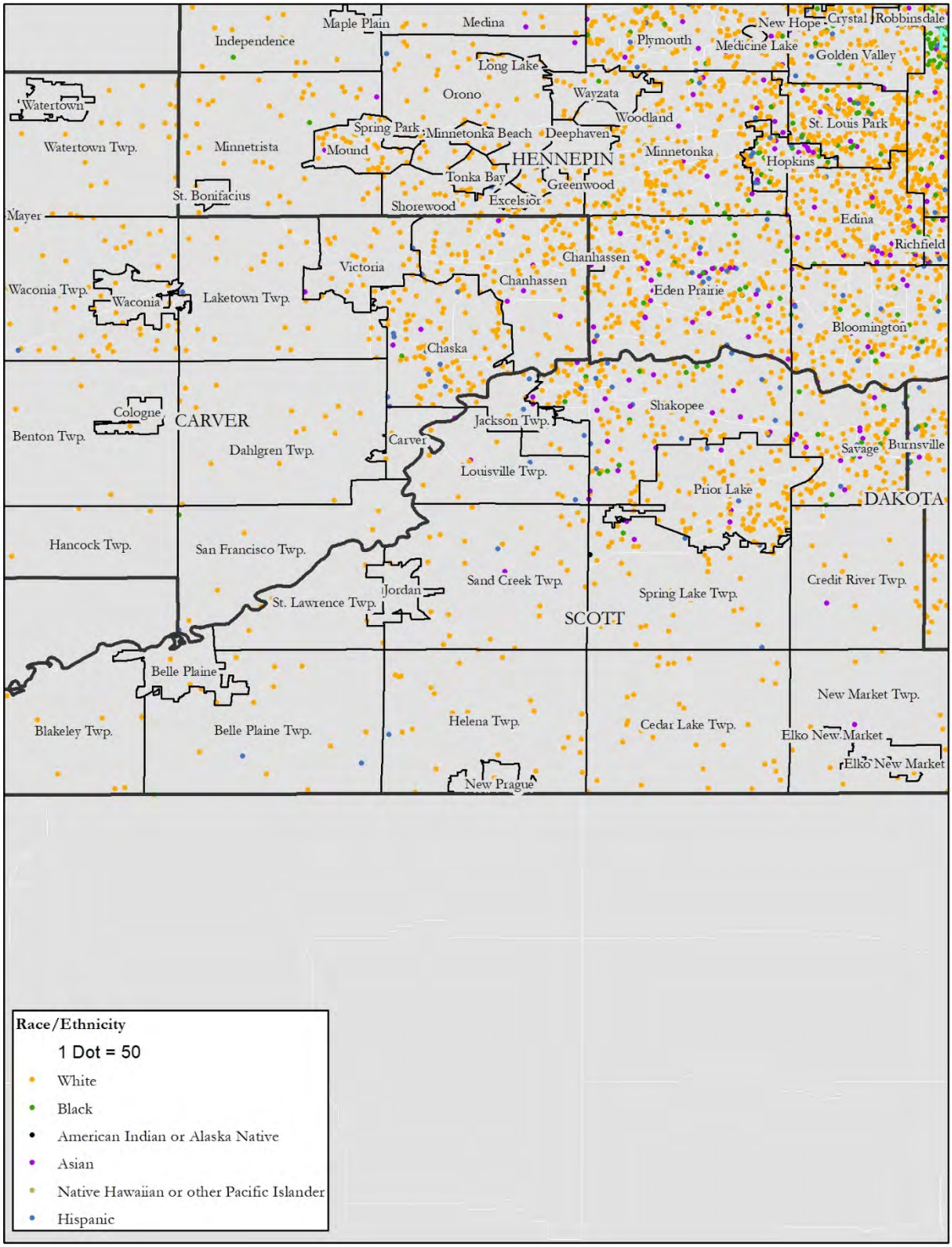
[189] *American Community Survey Estimates, 2013-2017.*

Map 13: Race/Ethnicity, Woodbury[190]



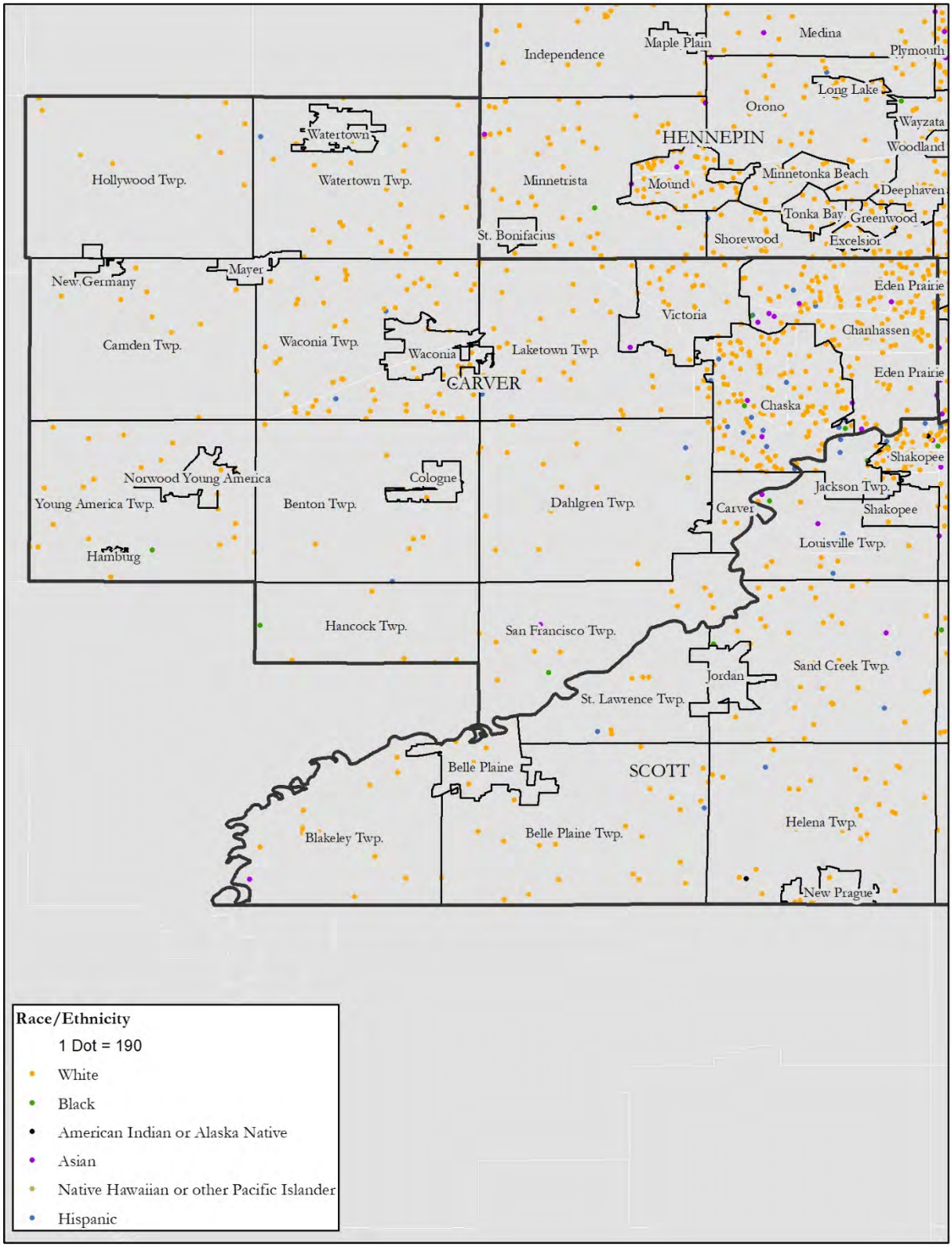
[190] *American Community Survey Estimates, 2013-2017.*

Map 14: Race/Ethnicity, Scott County[191]



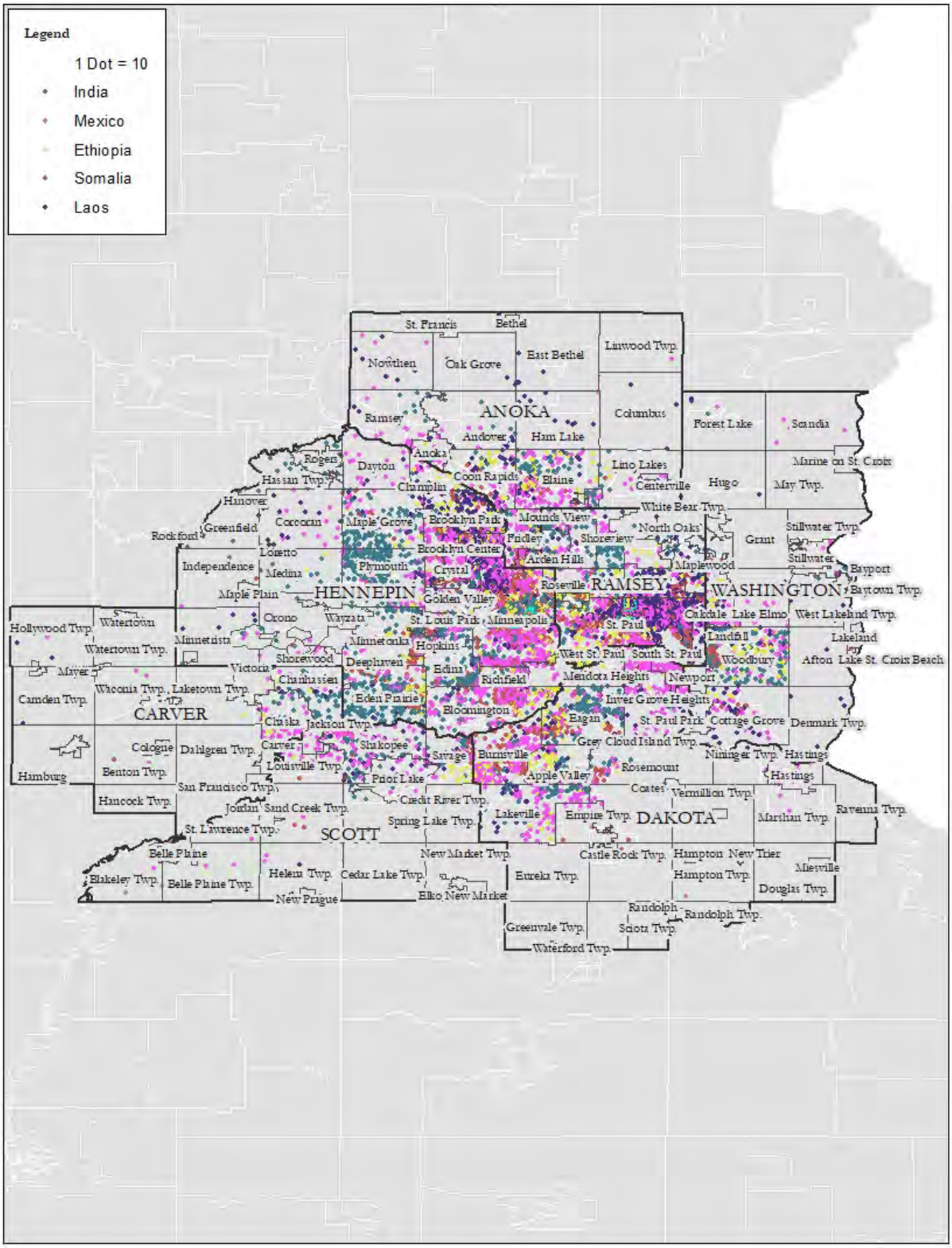
[191] *American Community Survey Estimates, 2013-2017.*

Map 15: Race/Ethnicity, Carver County[192]



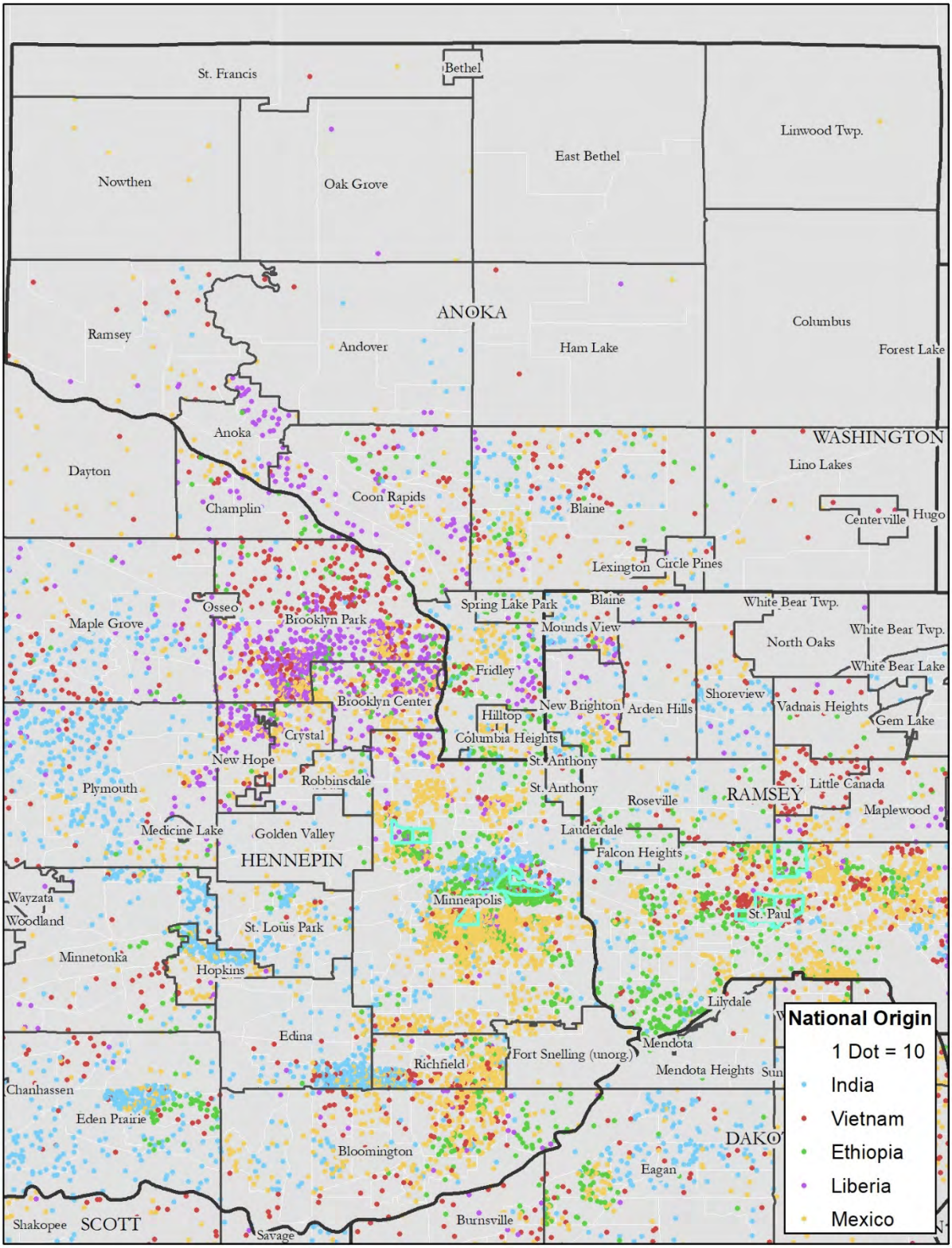
[192] *American Community Survey Estimates, 2013-2017.*

Map 16: National Origin, Region[193]



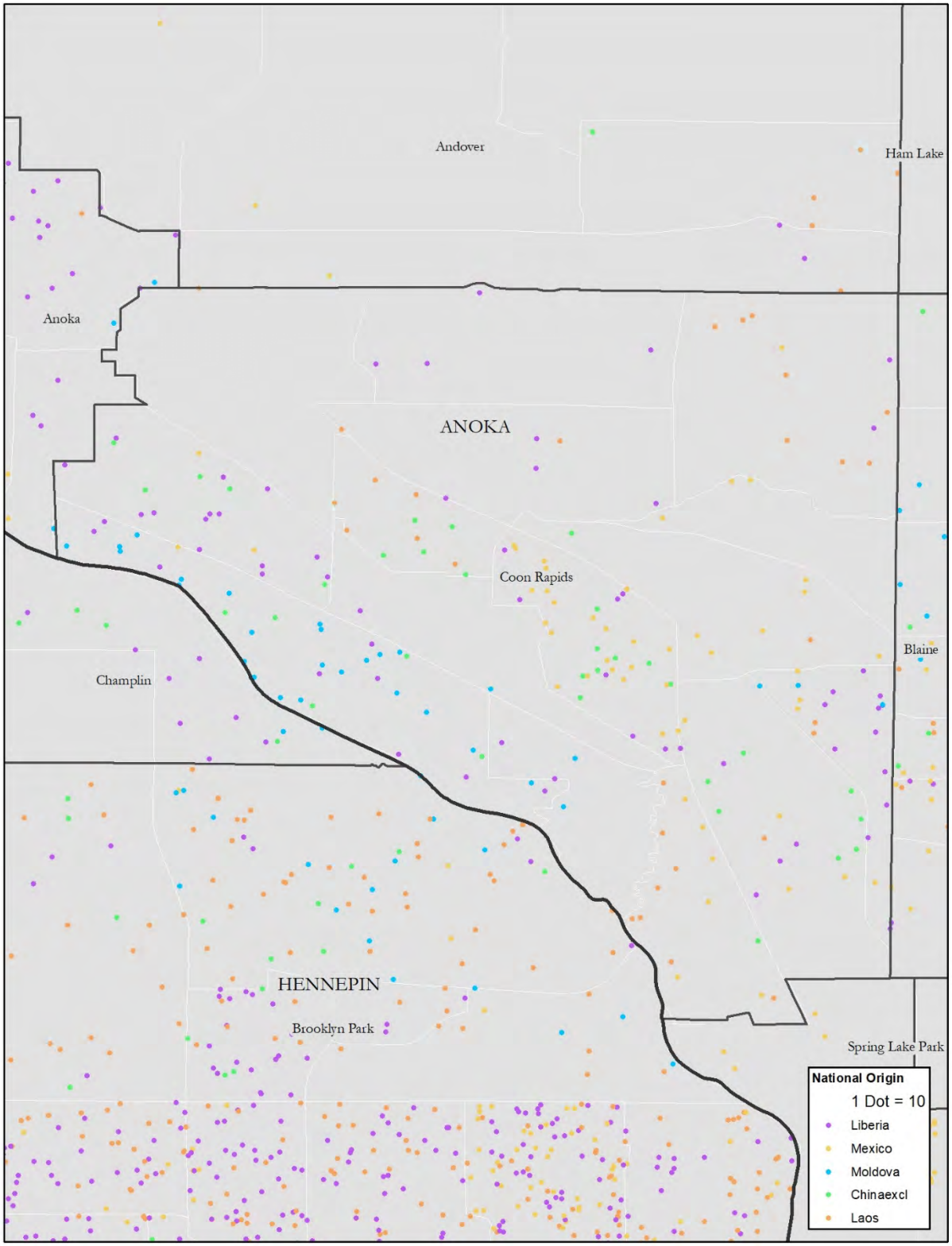
[193] *American Community Survey Estimates, 2013-2017.*

Map 17: National Origin, Anoka County[194]



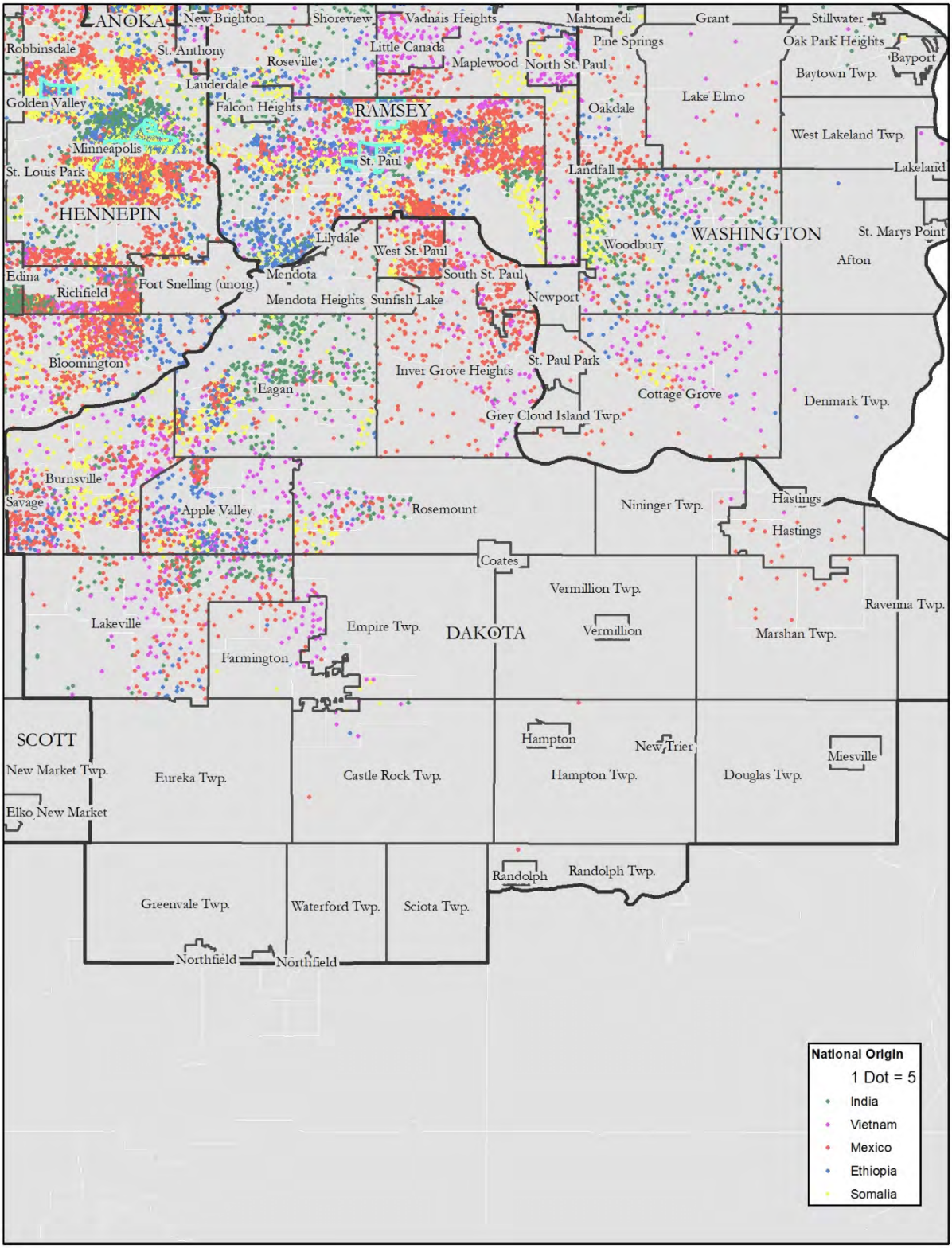
[194] *American Community Survey Estimates, 2013-2017.*

Map 18: National Origin, Coon Rapids[195]



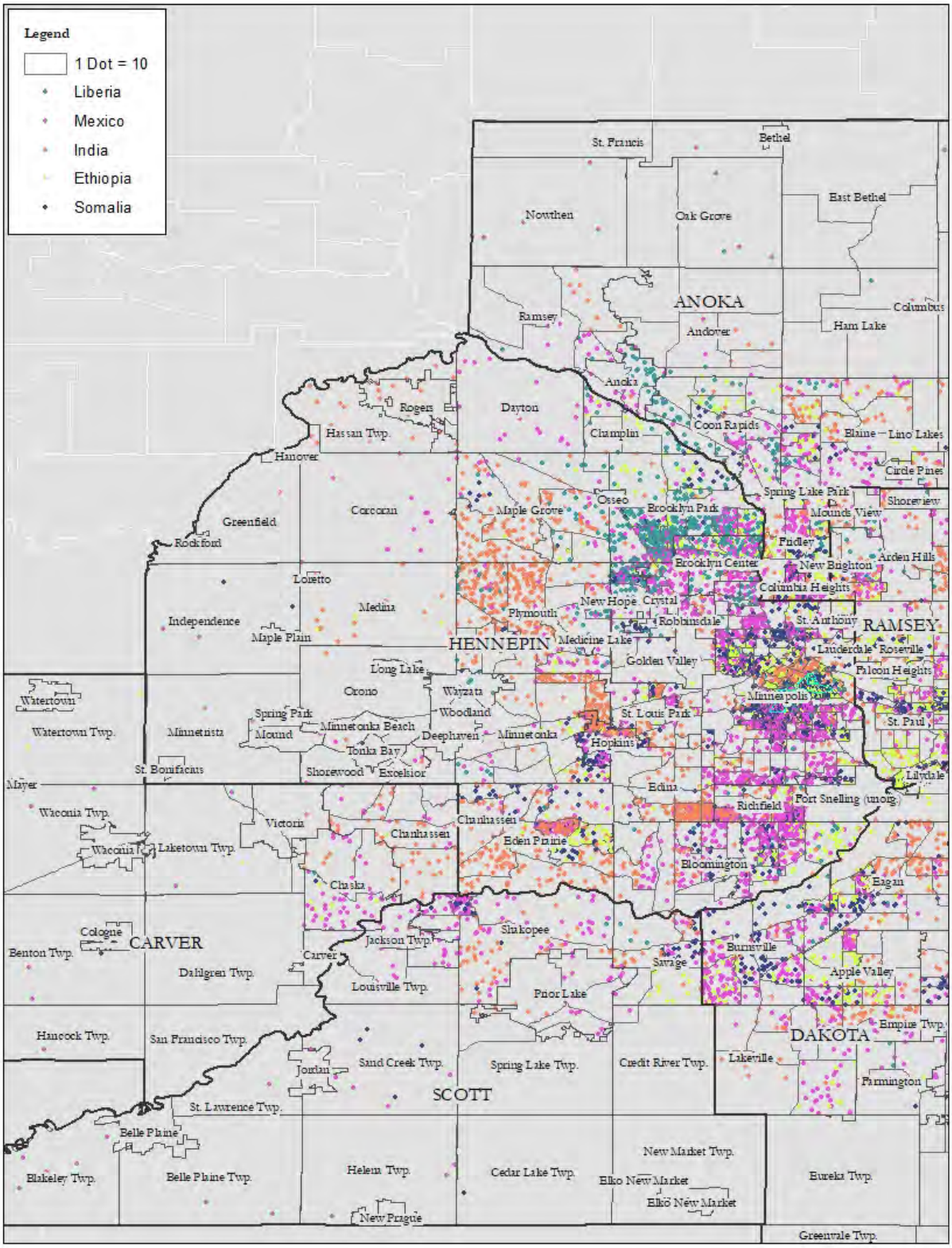
[195] *American Community Survey Estimates, 2013-2017.*

Map 19: National Origin, Dakota County[196]



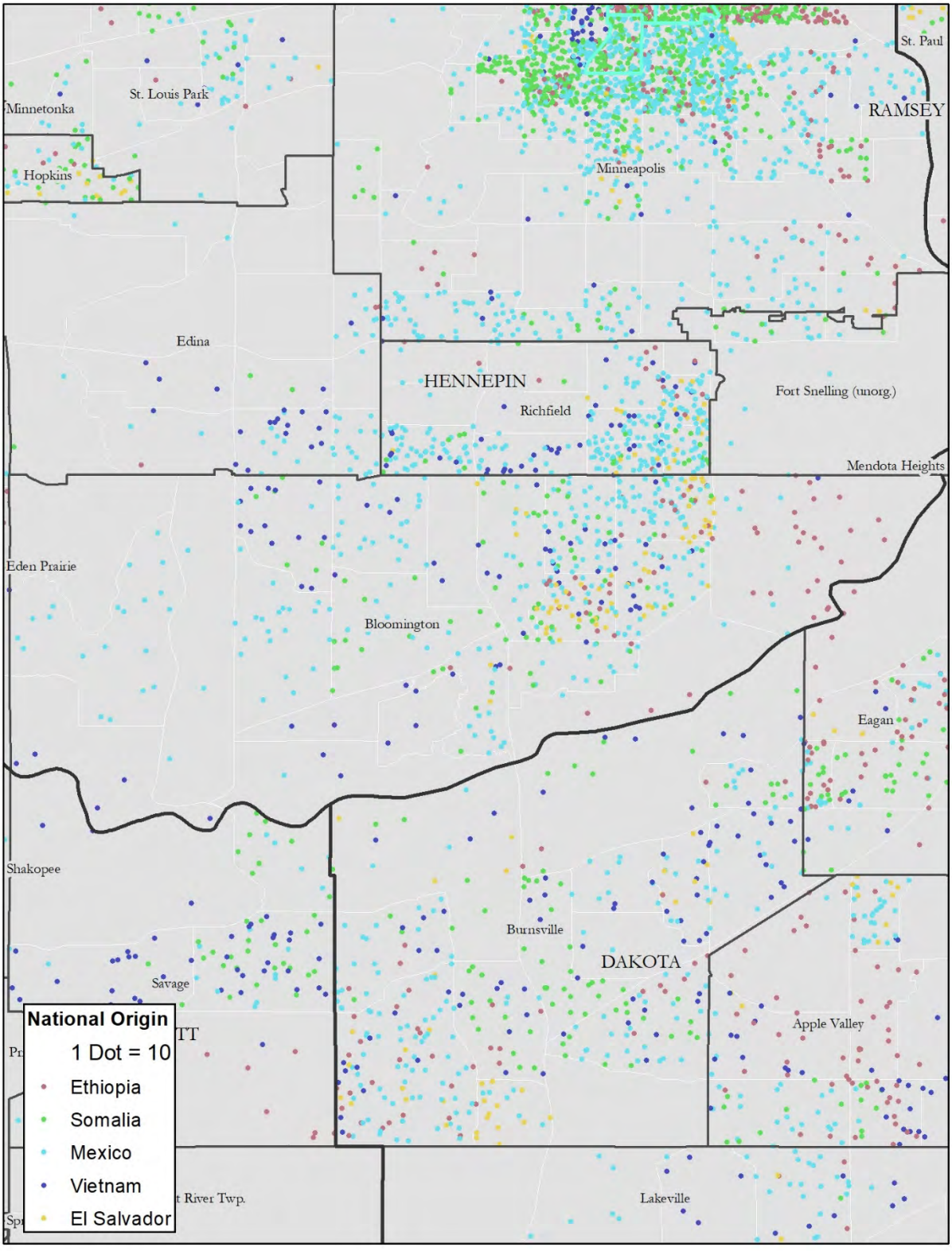
[196] *American Community Survey Estimates, 2013-2017.*

Map 20: National Origin, Hennepin County[197]



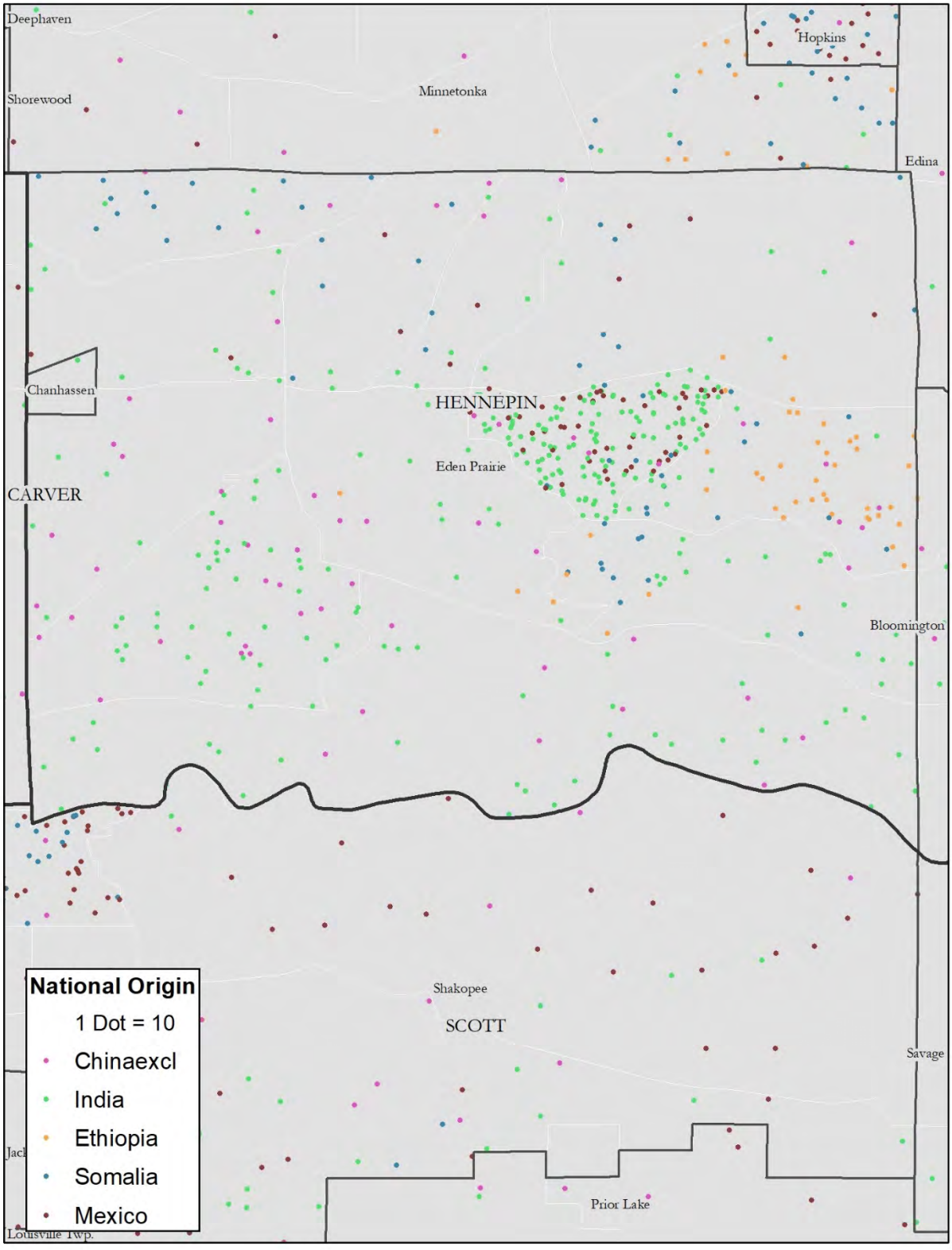
[197] *American Community Survey Estimates, 2013-2017.*

Map 21: National Origin, Bloomington[198]



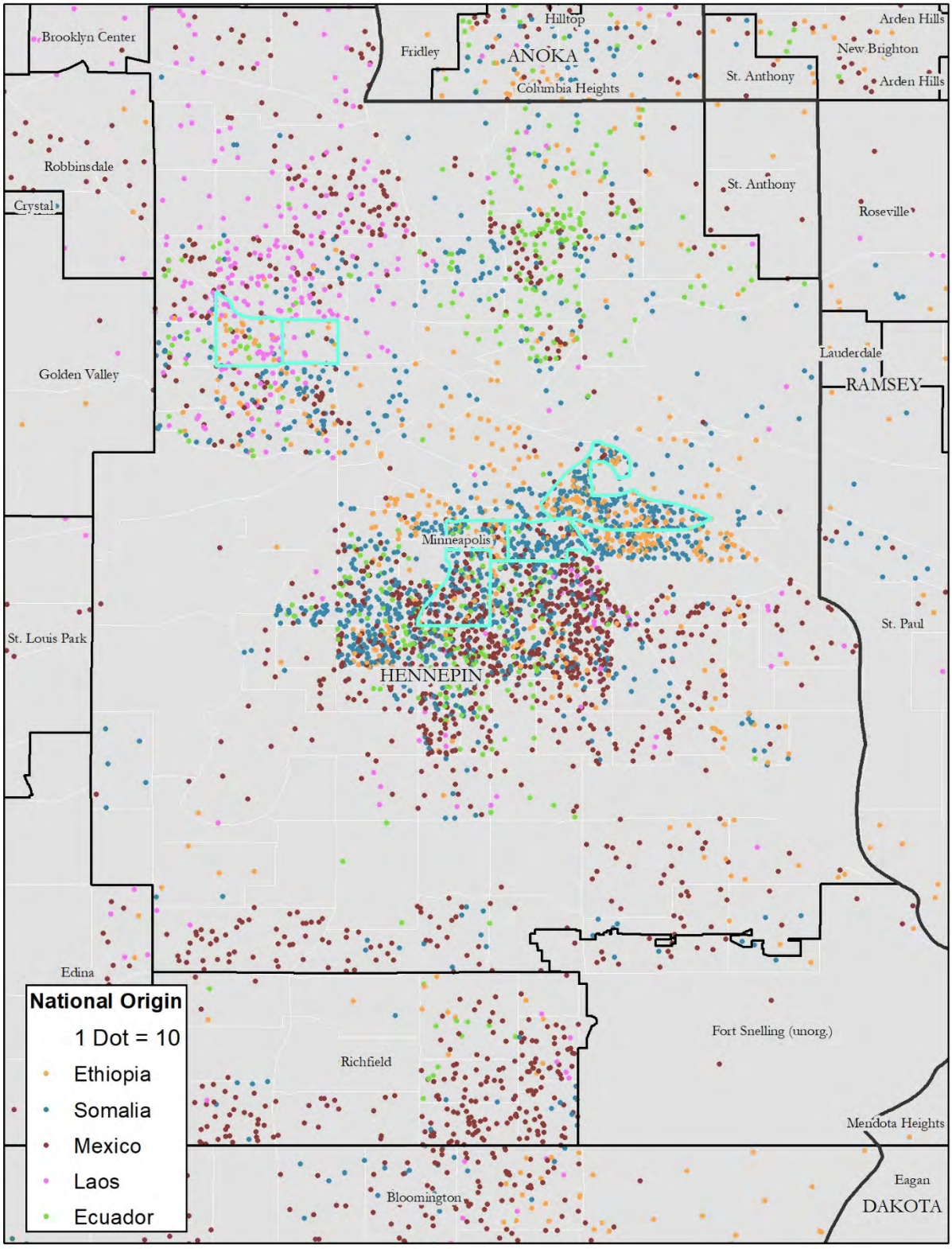
[198] *American Community Survey Estimates, 2013-2017.*

Map 22: National Origin, Eden Prairie[199]



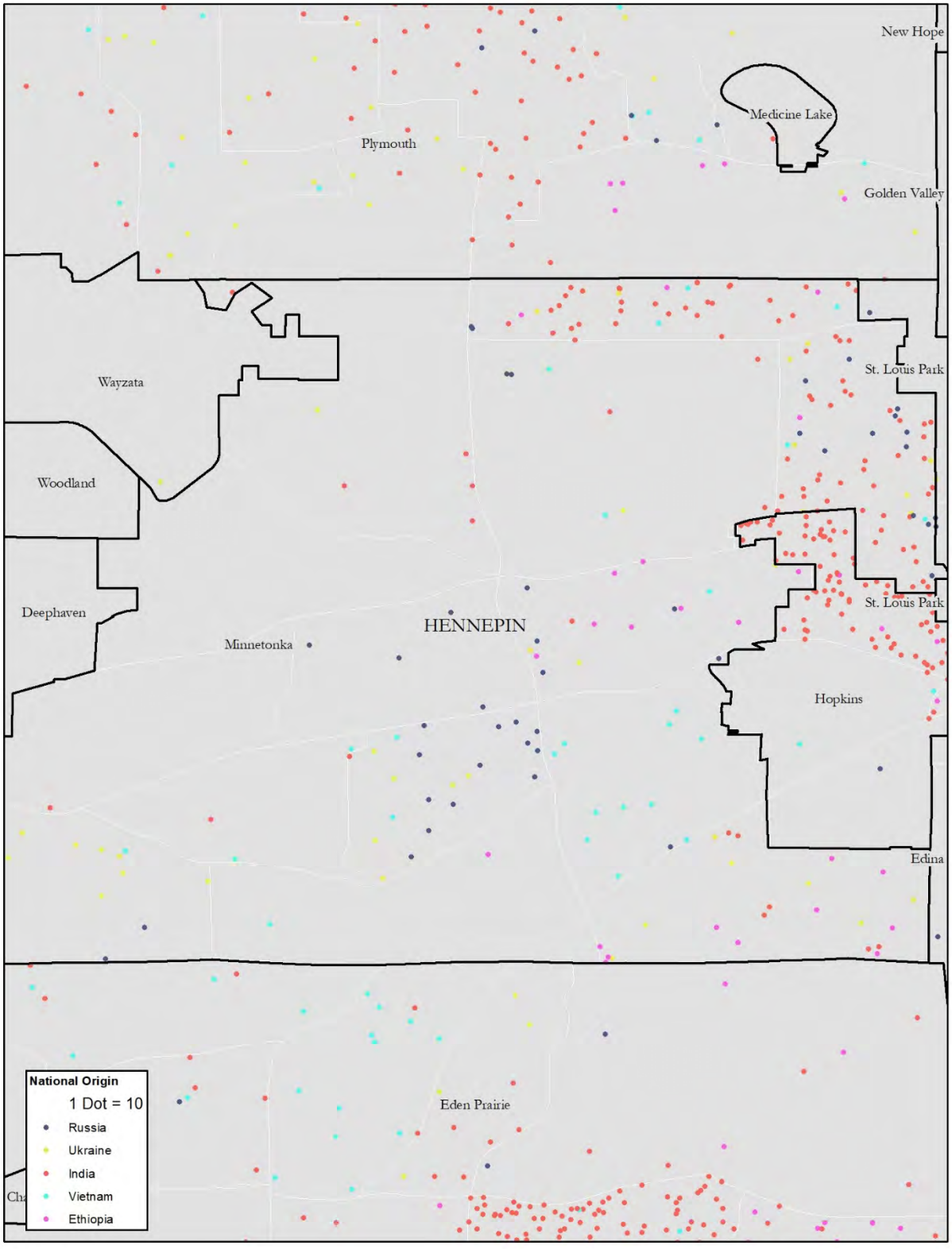
[199] *American Community Survey Estimates, 2013-2017.*

Map 23: National Origin, Minneapolis[200]



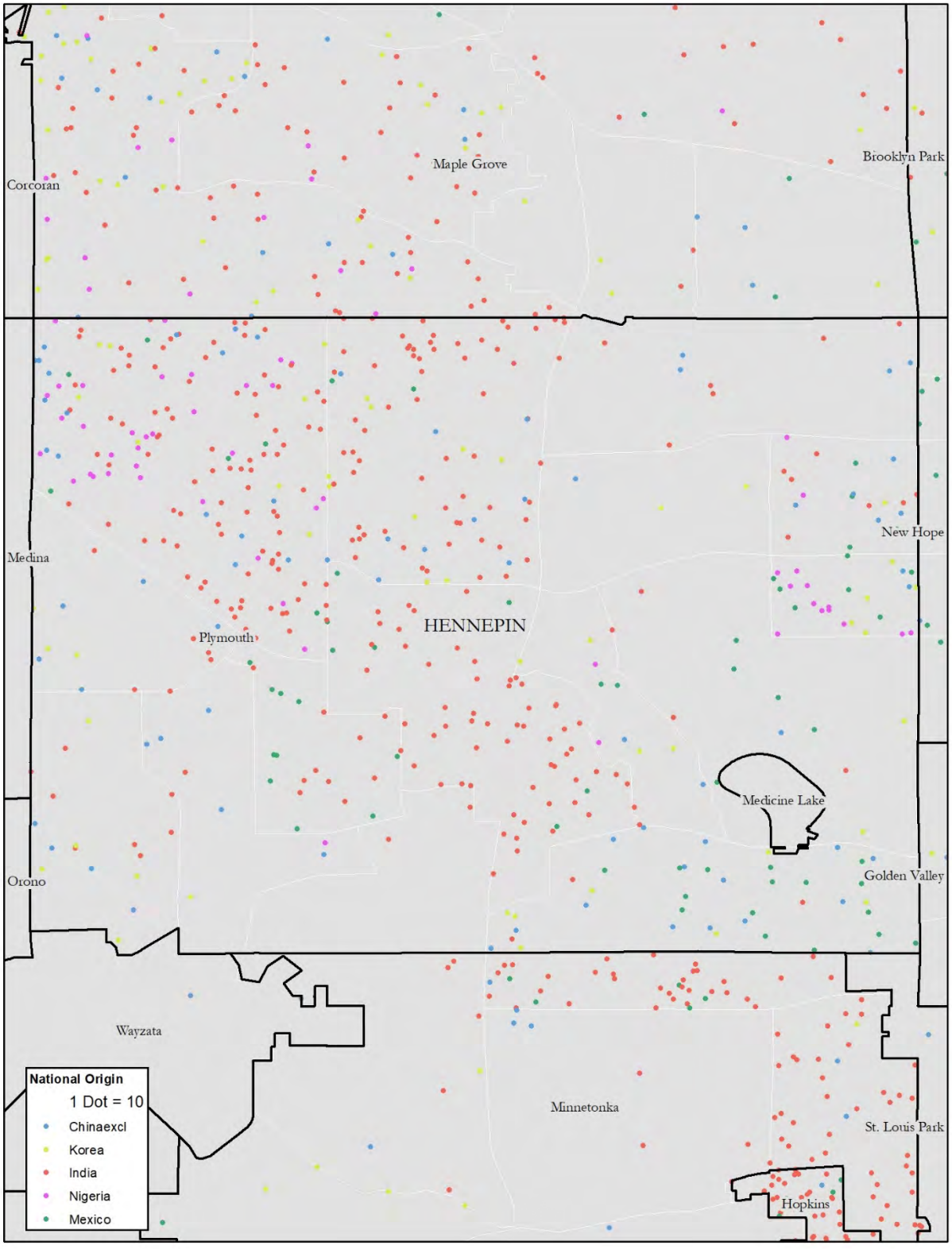
[200] *American Community Survey Estimates, 2013-2017.*

Map 24: National Origin, Minnetonka[201]



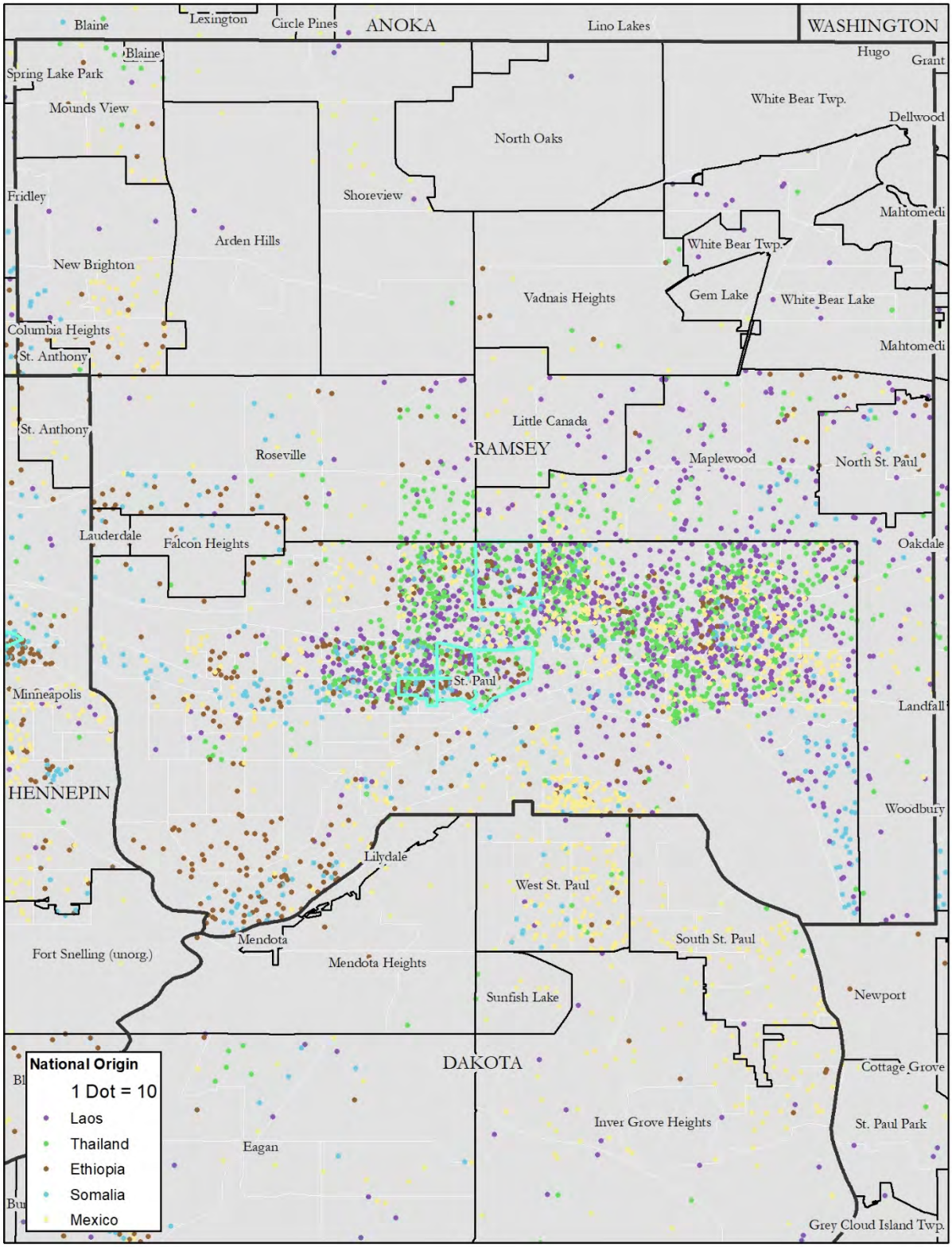
[201] *American Community Survey Estimates, 2013-2017.*

Map 25: National Origin, Plymouth[202]



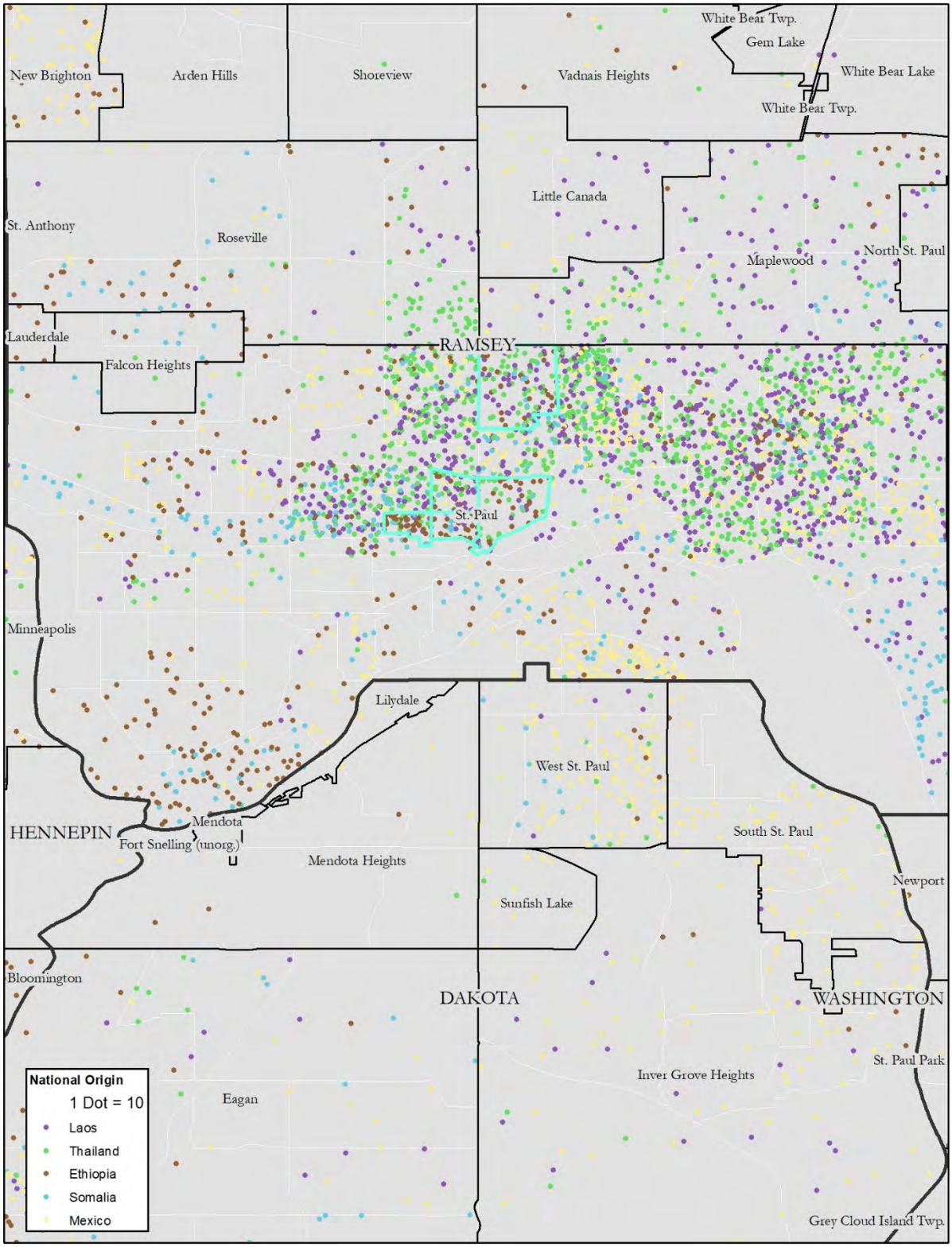
[202] *American Community Survey Estimates, 2013-2017.*

Map 26: National Origin, Ramsey County[203]



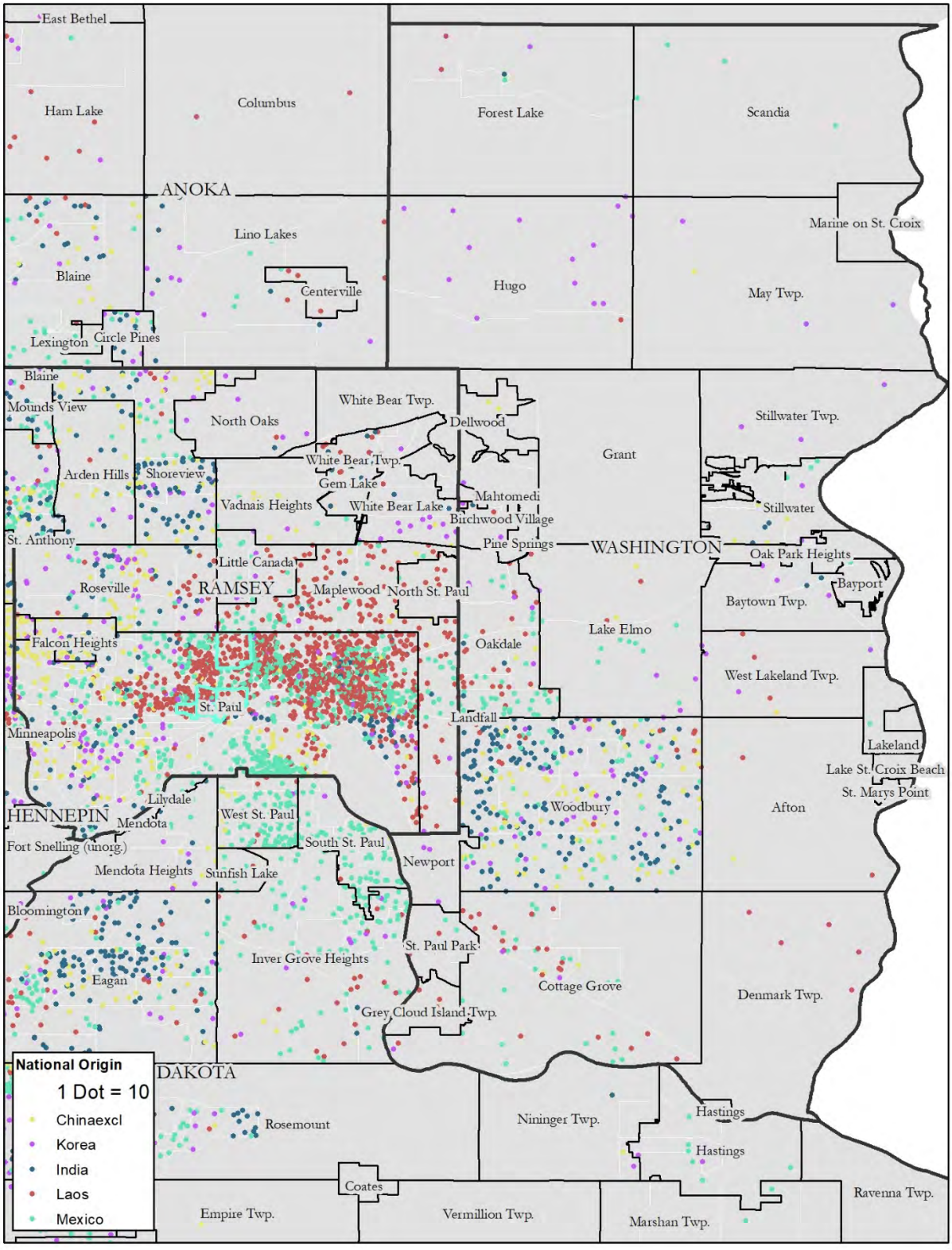
[203] *American Community Survey Estimates, 2013-2017.*

Map 27: National Origin, St. Paul[204]



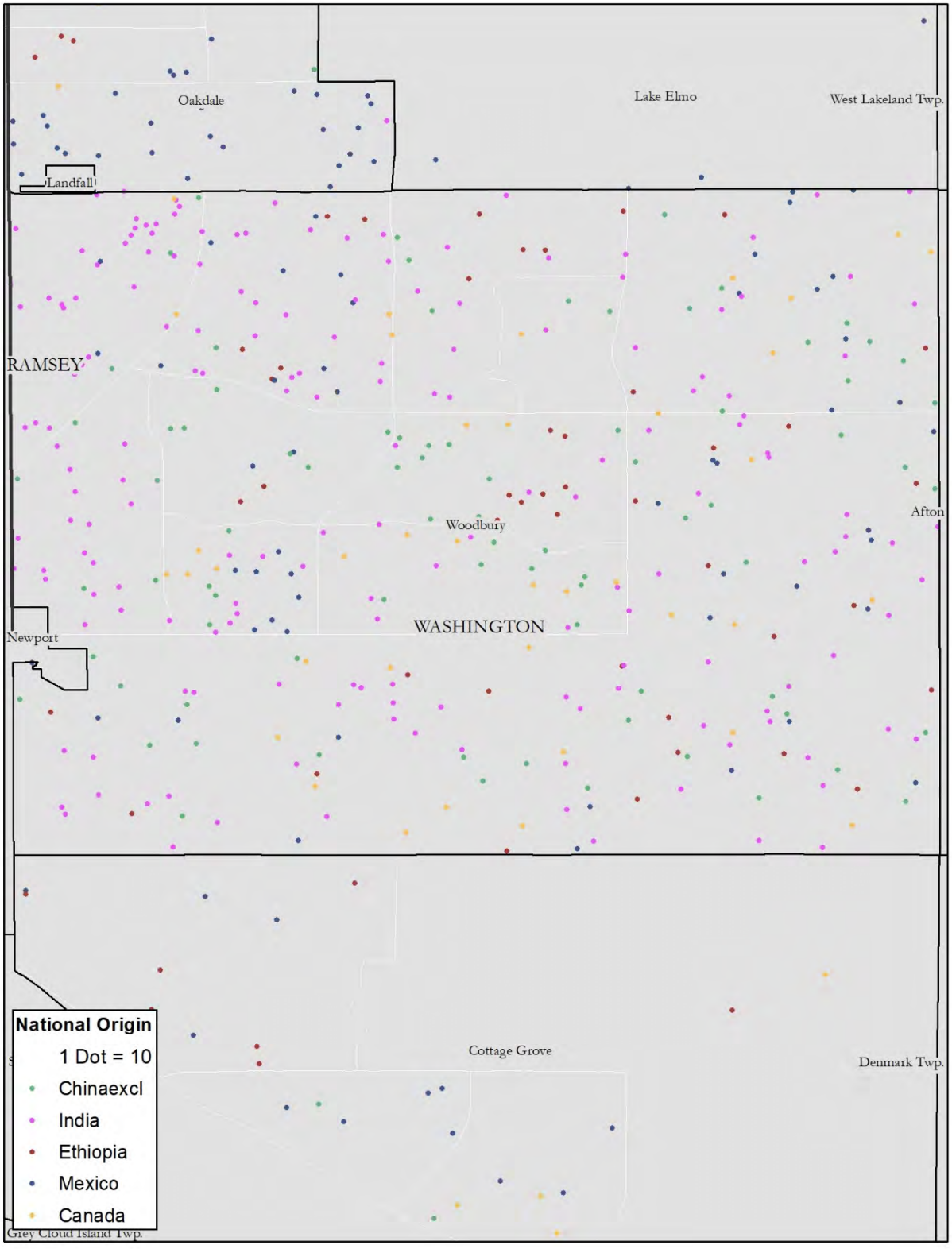
[204] *American Community Survey Estimates, 2013-2017.*

Map 28: National Origin, Washington County[205]



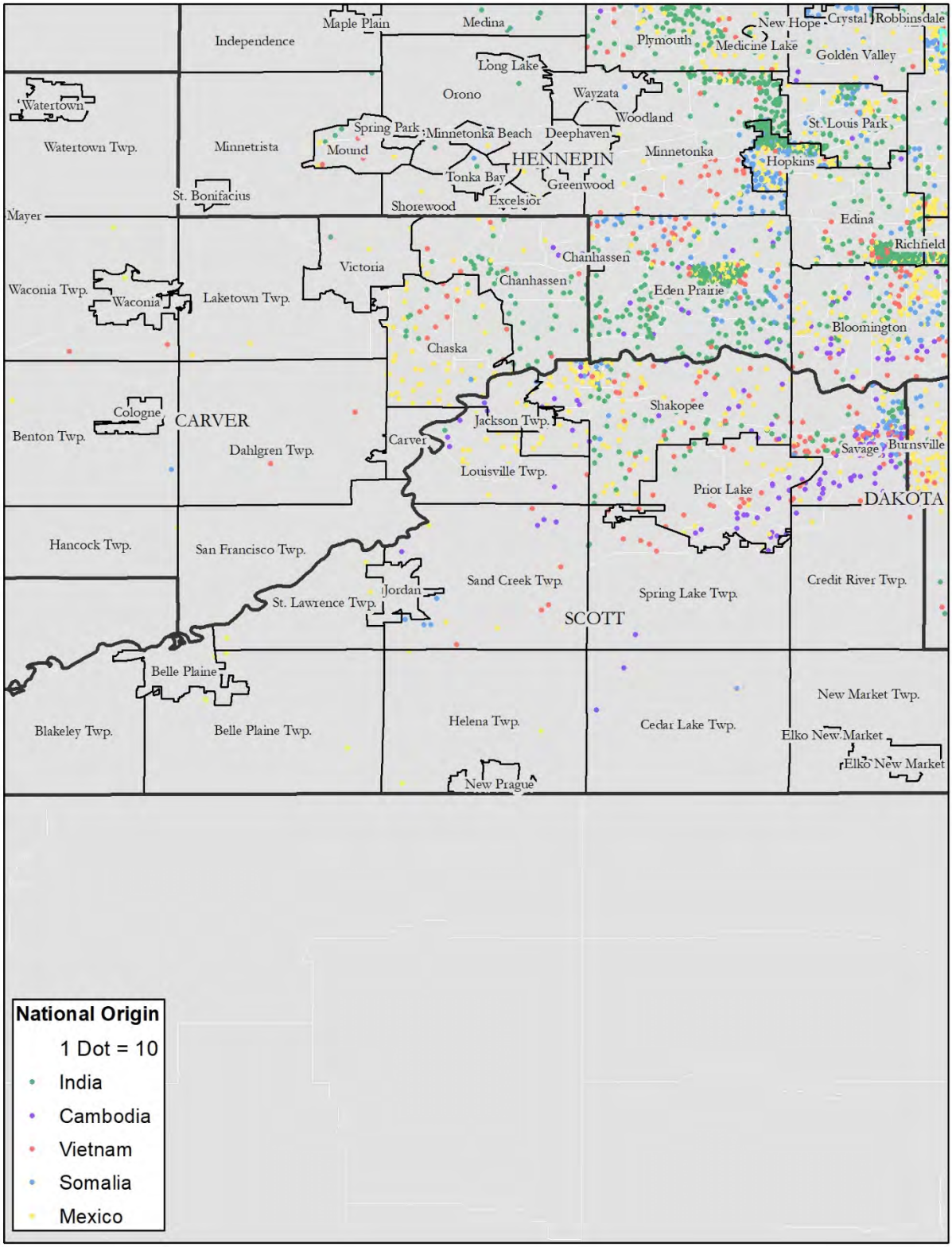
[205] *American Community Survey Estimates, 2013-2017.*

Map 29: National Origin, Woodbury[206]



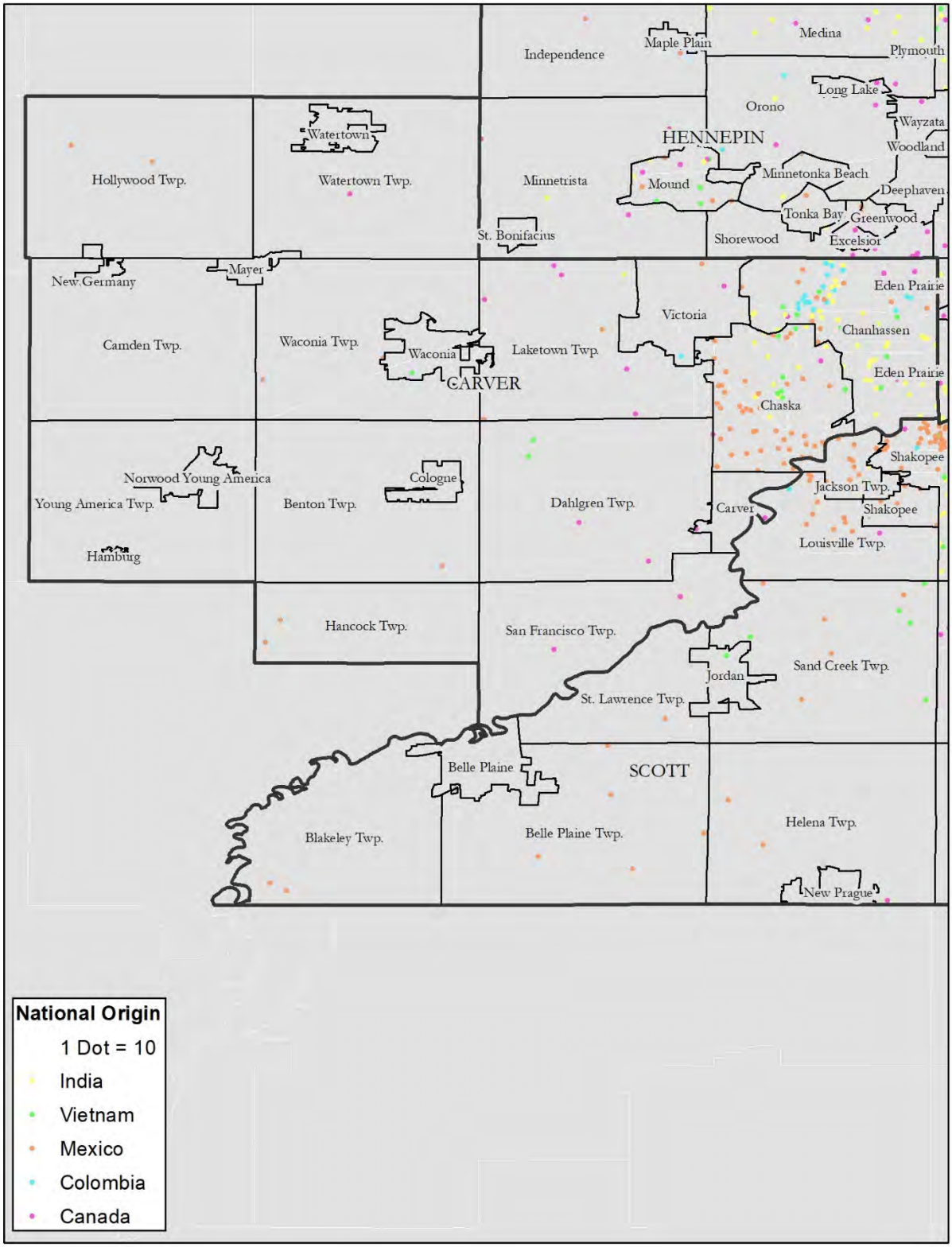
[206] *American Community Survey Estimates, 2013-2017.*

Map 30: National Origin, Scott County[207]



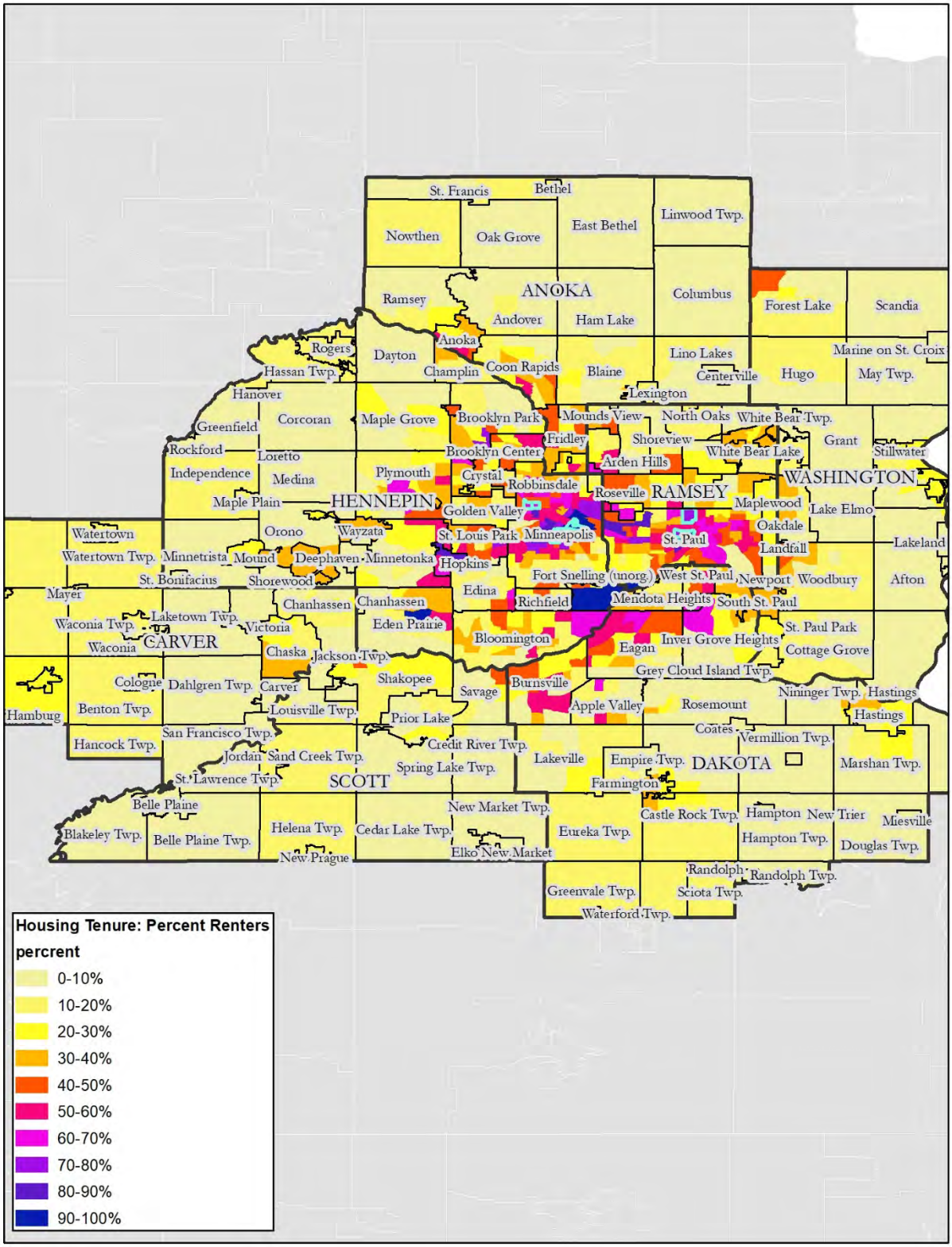
[207] *American Community Survey Estimates, 2013-2017.*

Map 31: National Origin, Carver County[208]



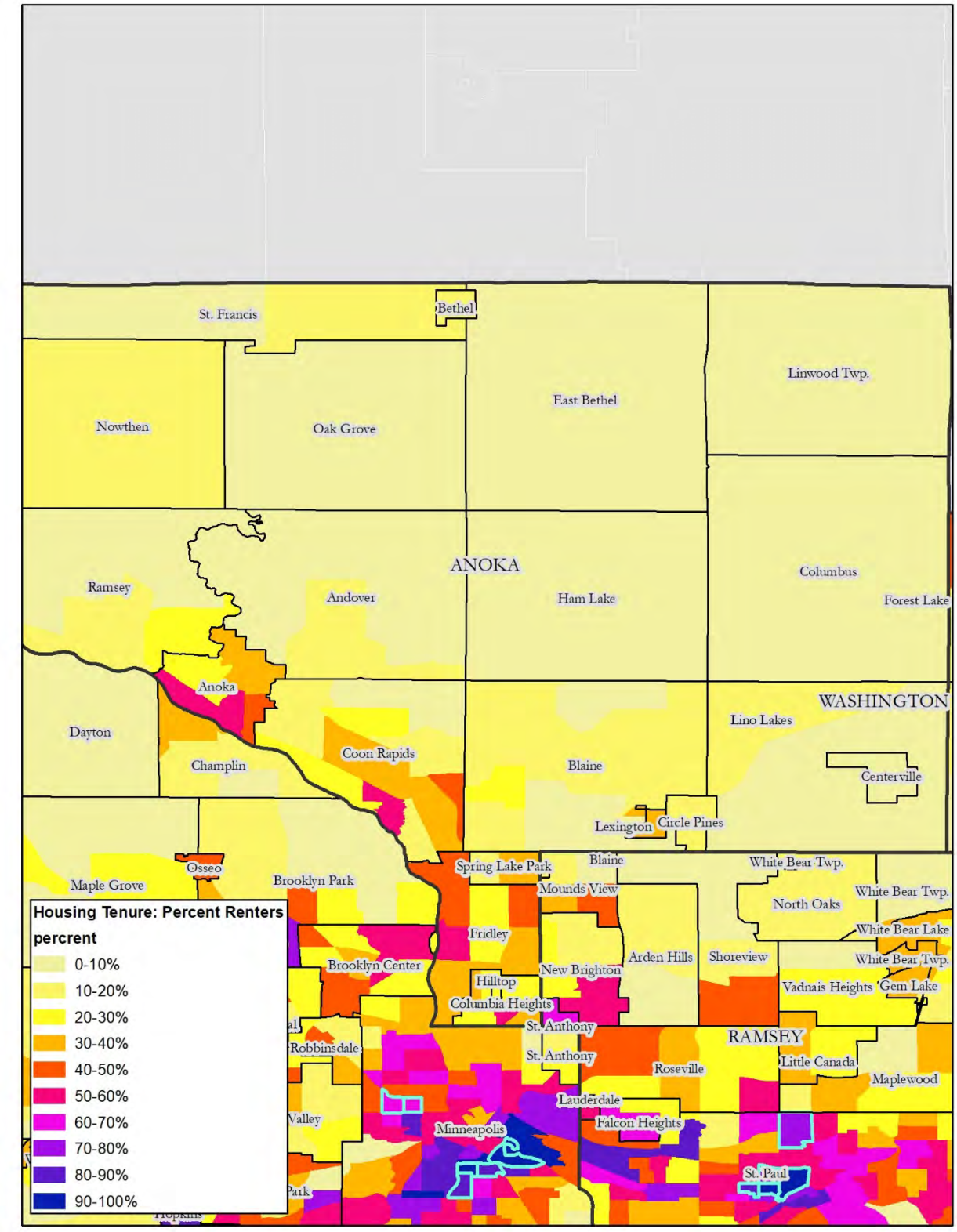
[208] *American Community Survey Estimates, 2013-2017.*

Map 32: Housing Tenure, Region[209]



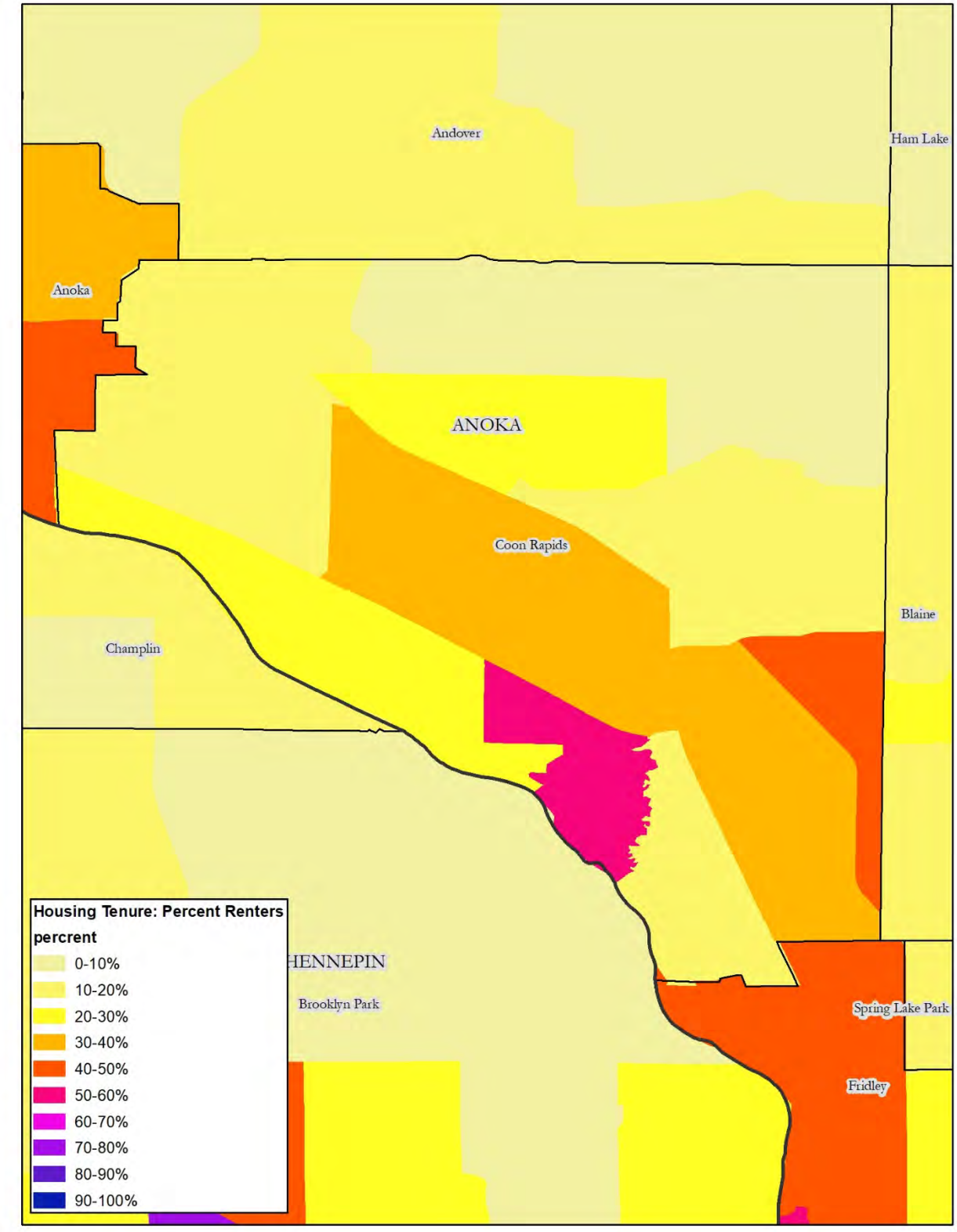
[209] *American Community Survey Estimates, 2013-2017.*

Map 33: Housing Tenure, Anoka County[210]



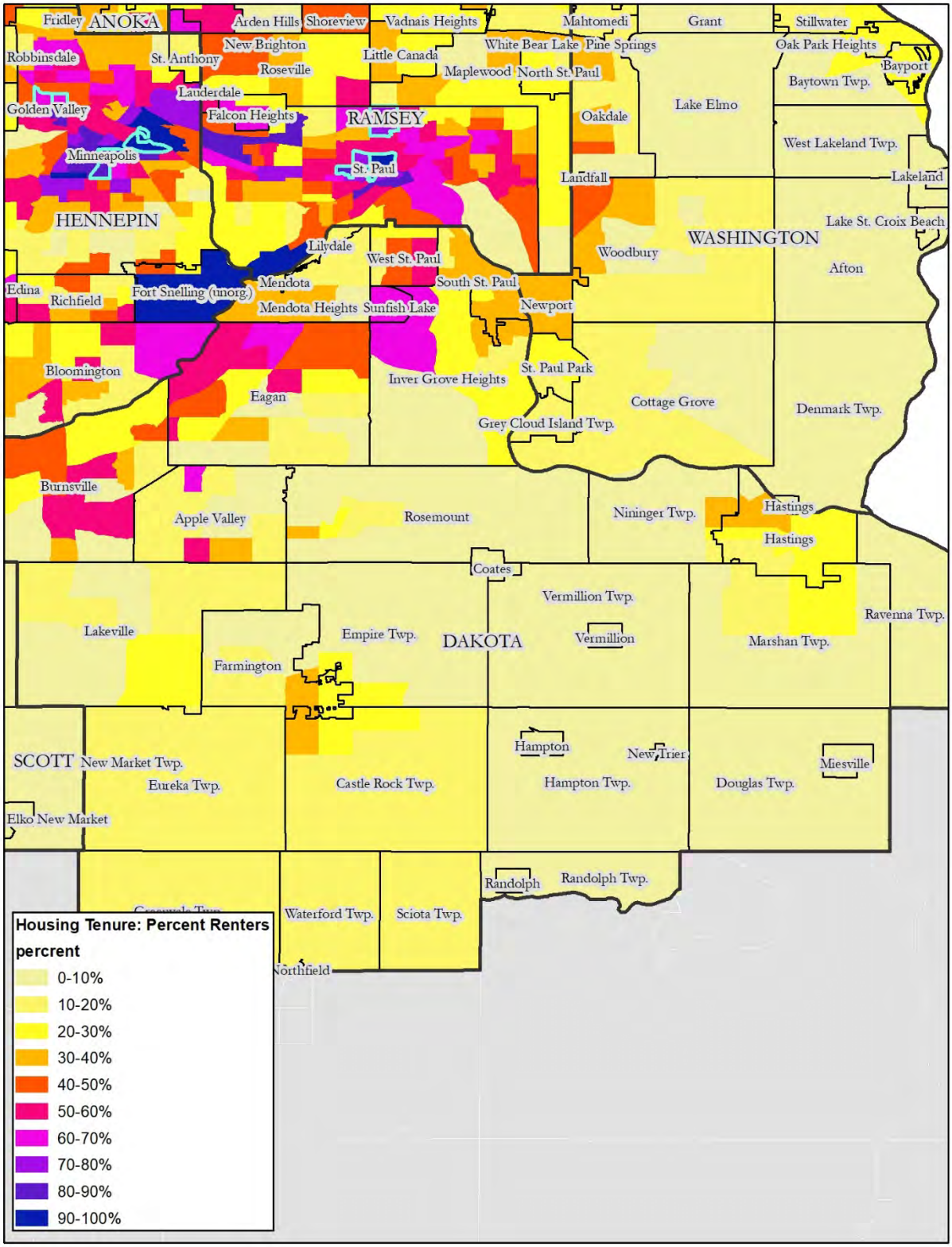
[210] *American Community Survey Estimates, 2013-2017.*

Map 34: Housing Tenure, Coon Rapids[211]



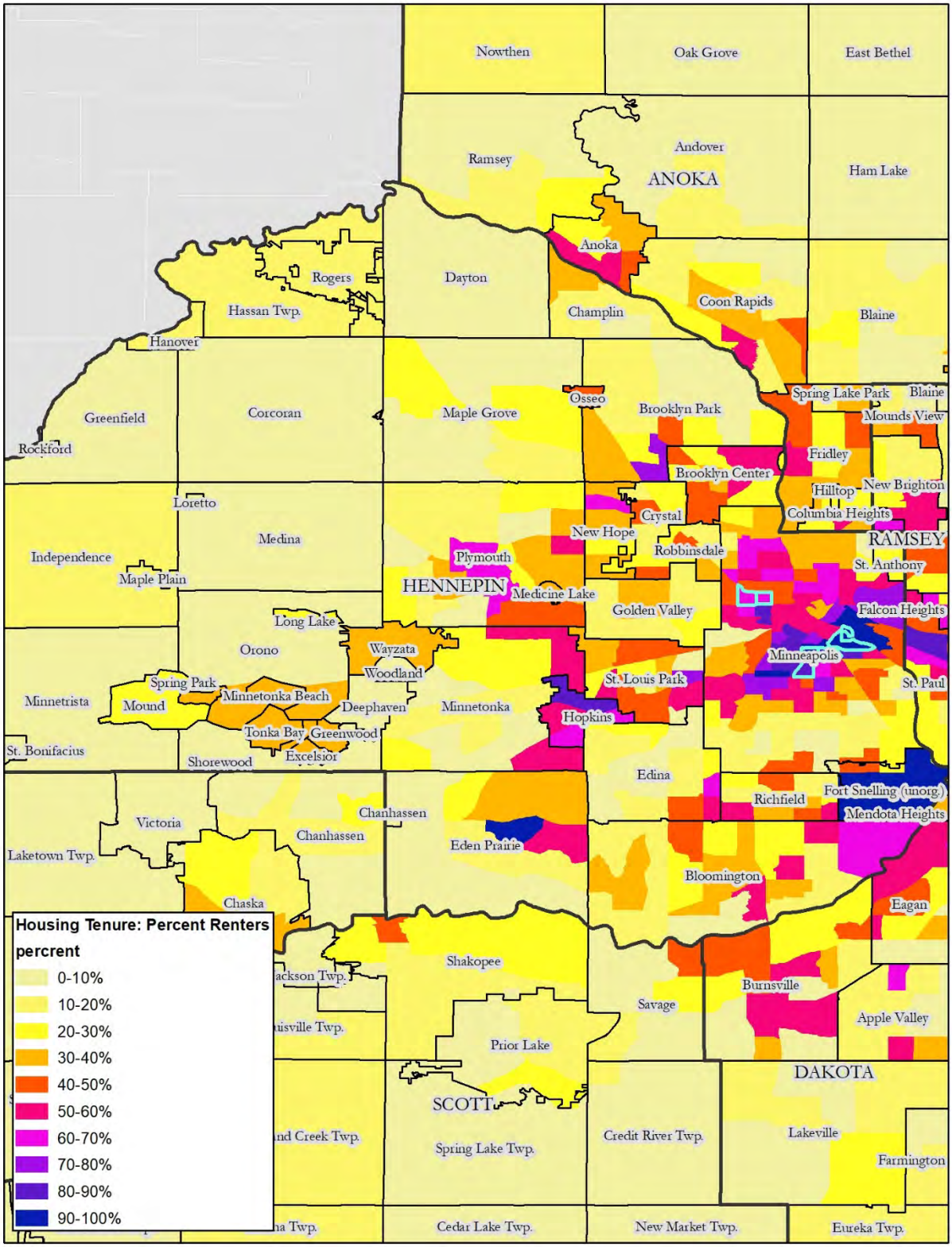
[211] *American Community Survey Estimates, 2013-2017.*

Map 35: Housing Tenure, Dakota County[212]



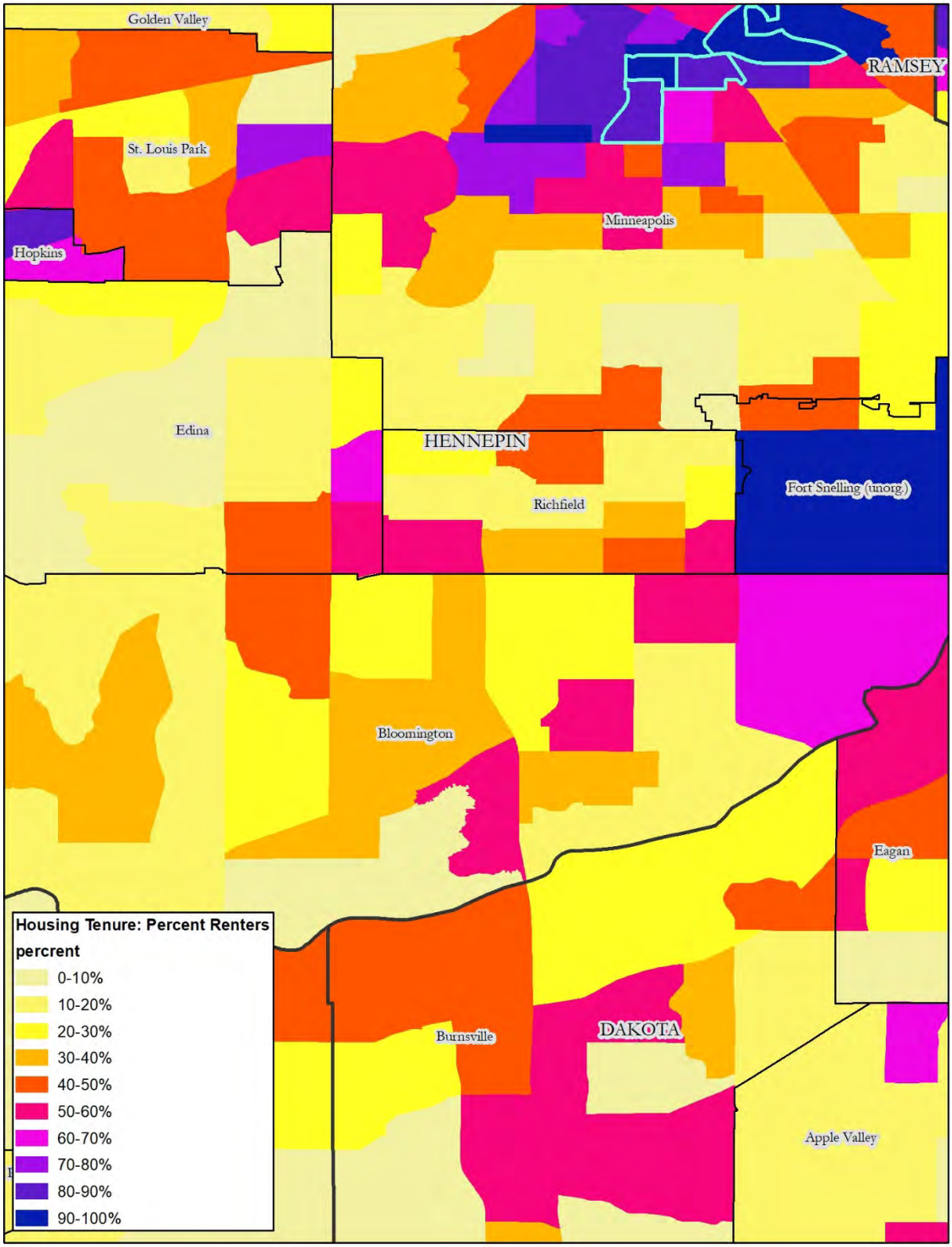
[212] *American Community Survey Estimates, 2013-2017.*

Map 36: Housing Tenure, Hennepin County[213]



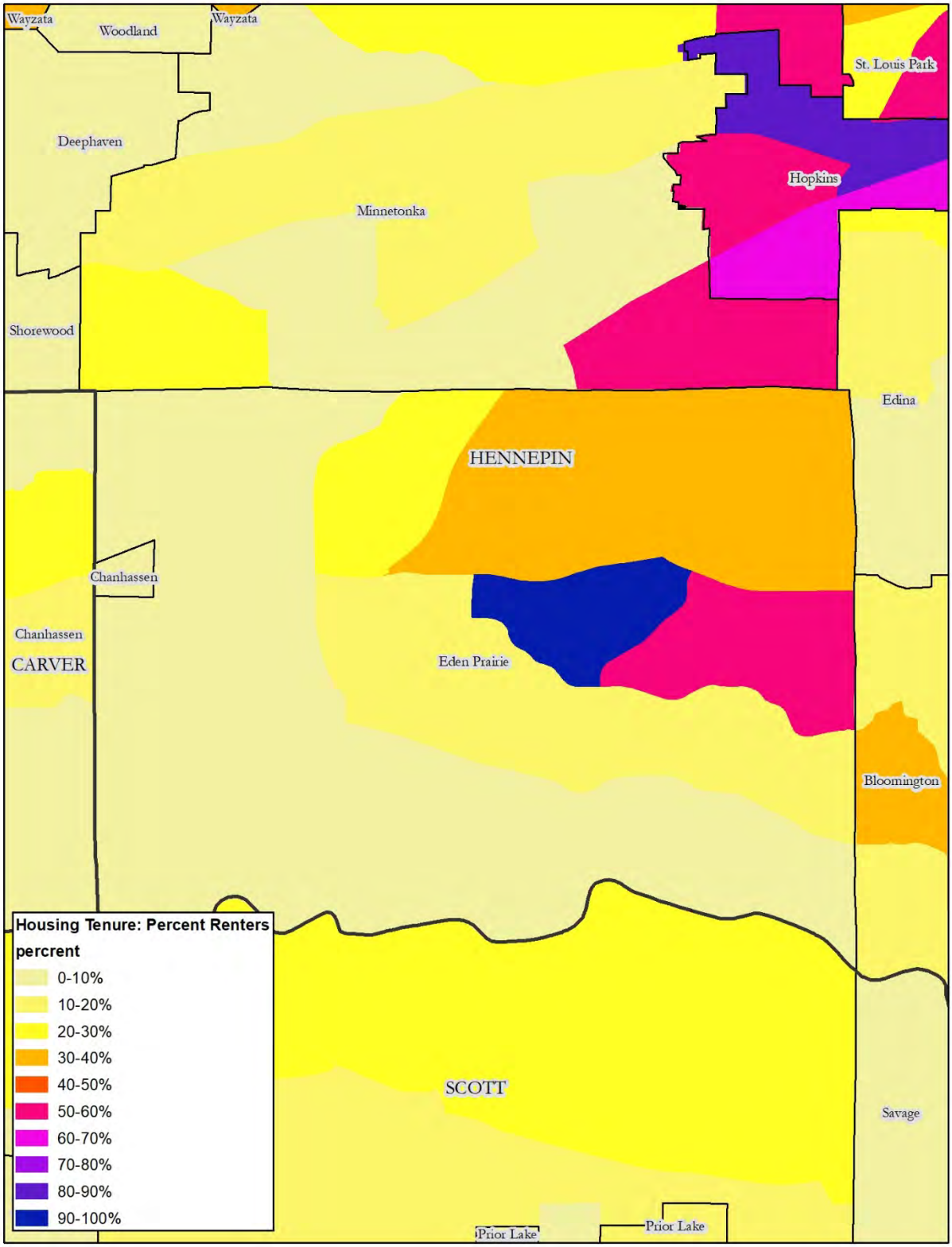
[213] *American Community Survey Estimates, 2013-2017.*

Map 37: Housing Tenure, Bloomington[214]



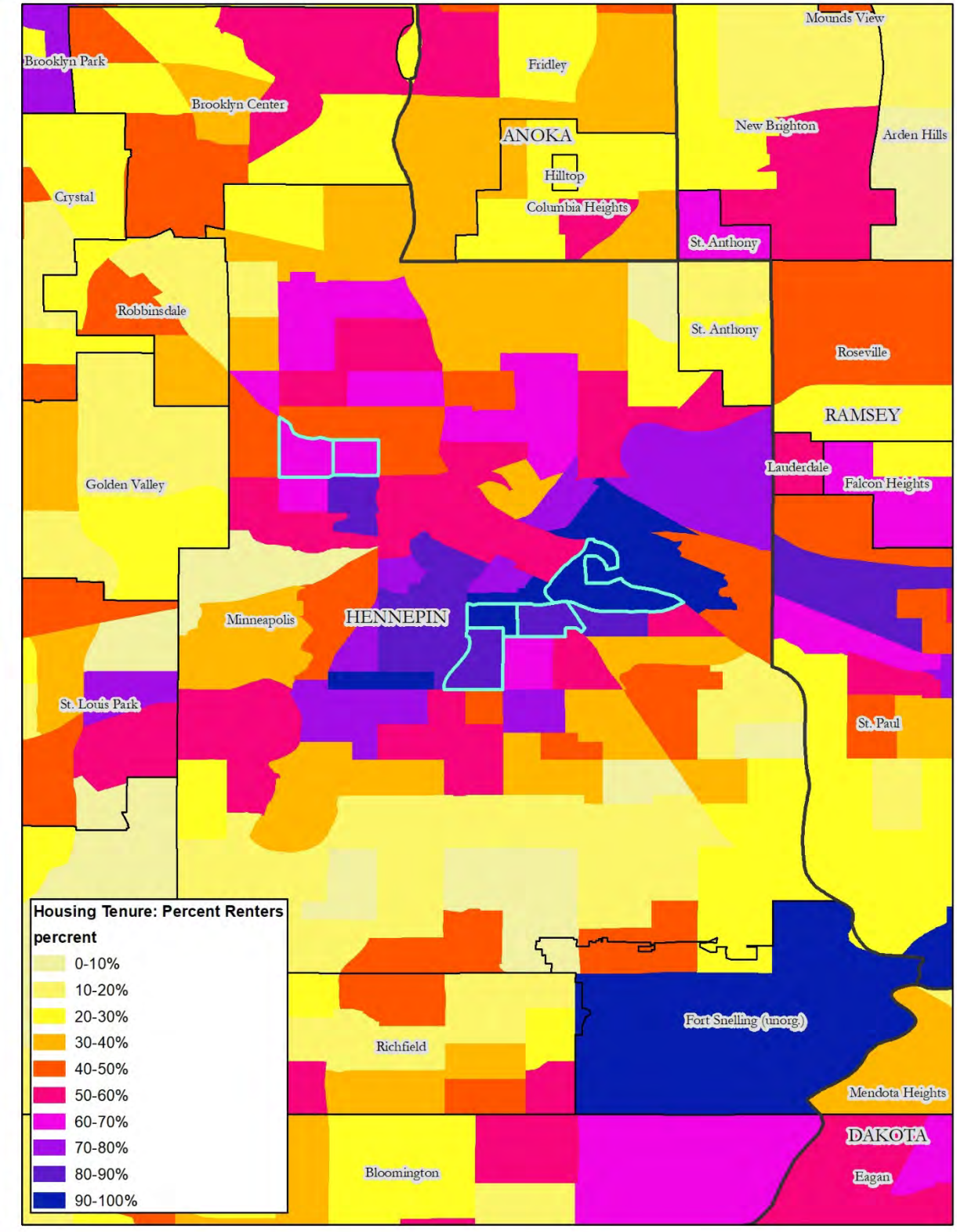
[214] *American Community Survey Estimates, 2013-2017.*

Map 38: Housing Tenure, Eden Prairie[215]



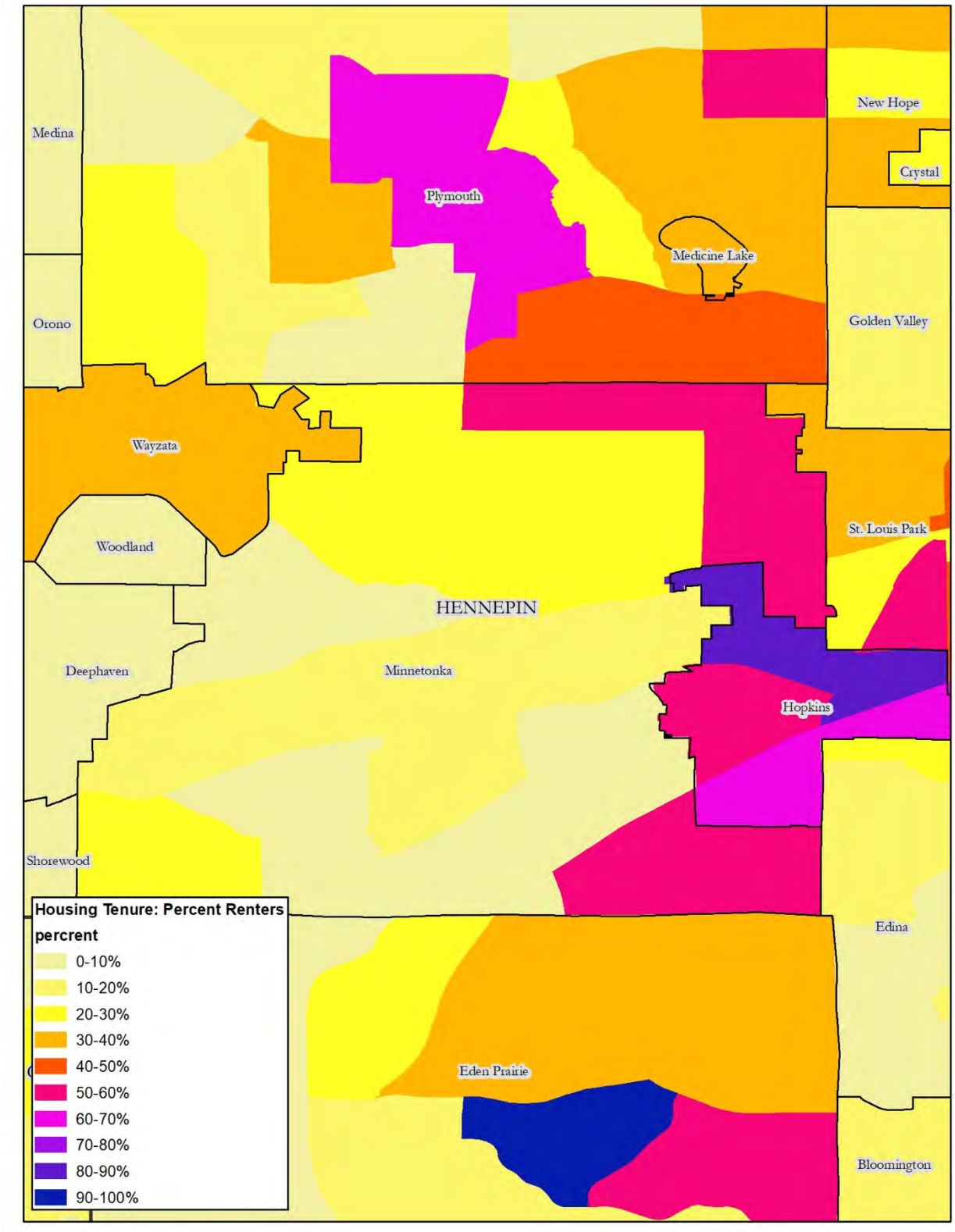
[215] *American Community Survey Estimates, 2013-2017.*

Map 39: Housing Tenure, Minneapolis[216]



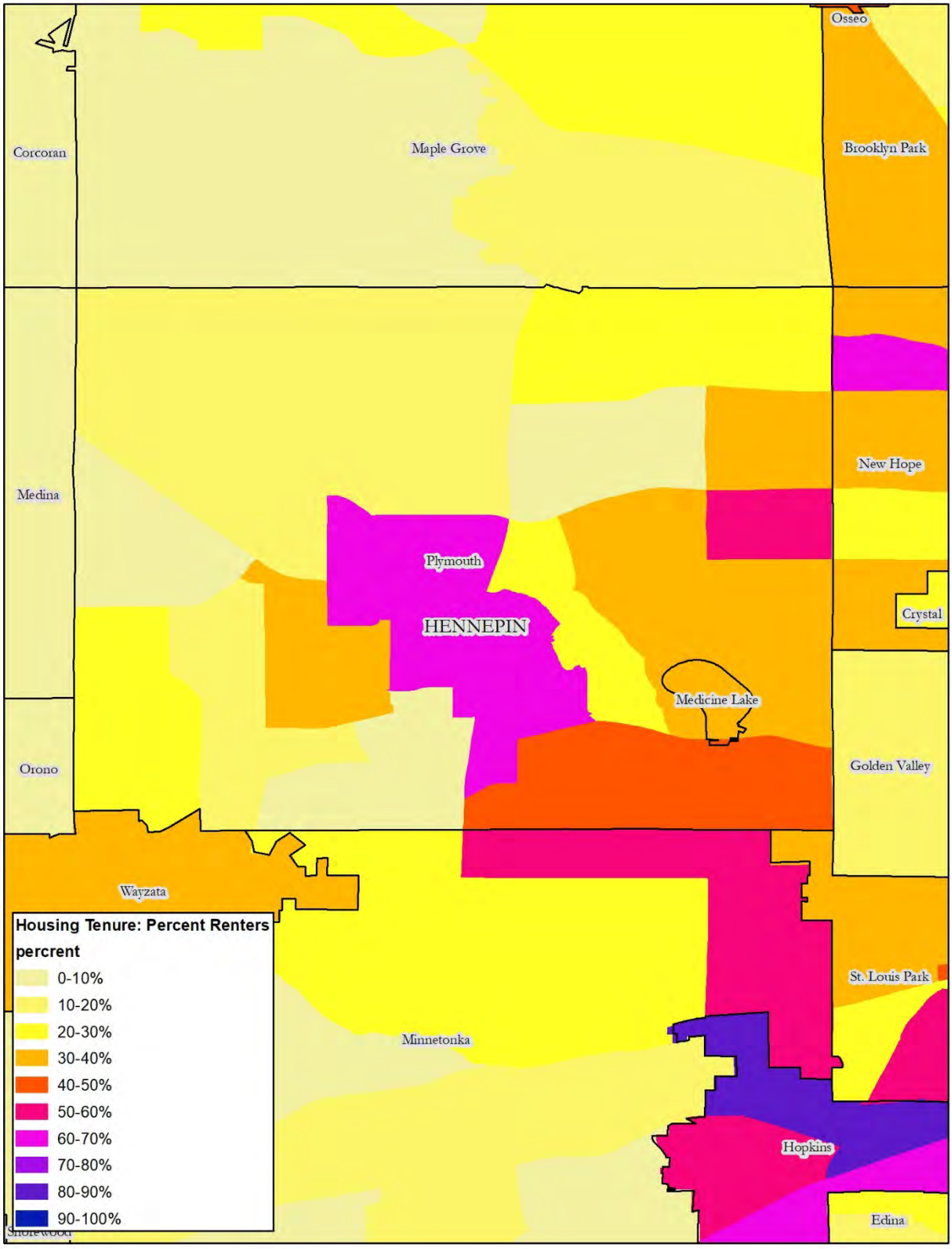
[216] *American Community Survey Estimates, 2013-2017.*

Map 40: Housing Tenure, Minnetonka[217]



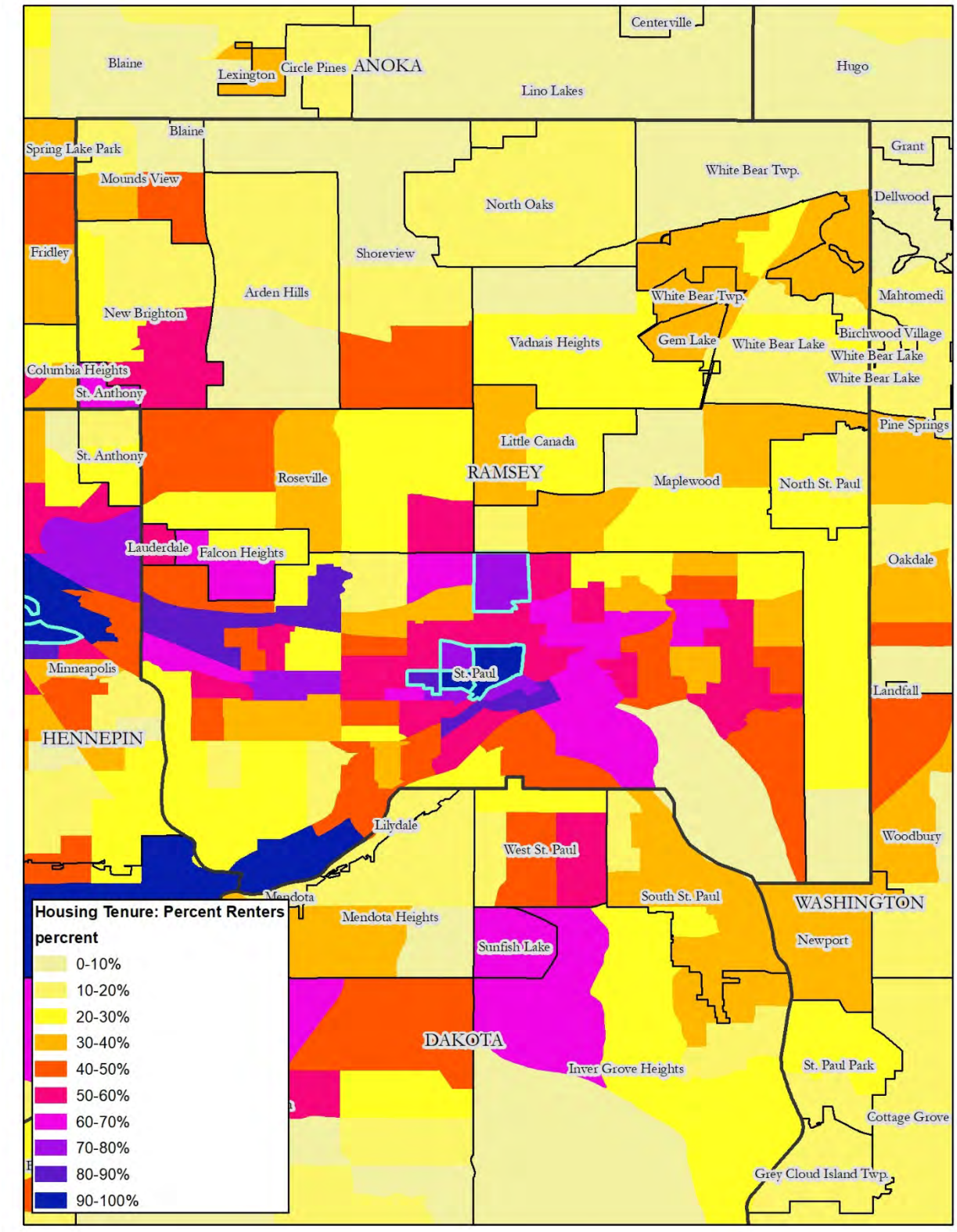
[217] *American Community Survey Estimates, 2013-2017.*

Map 41: Housing Tenure, Plymouth[218]



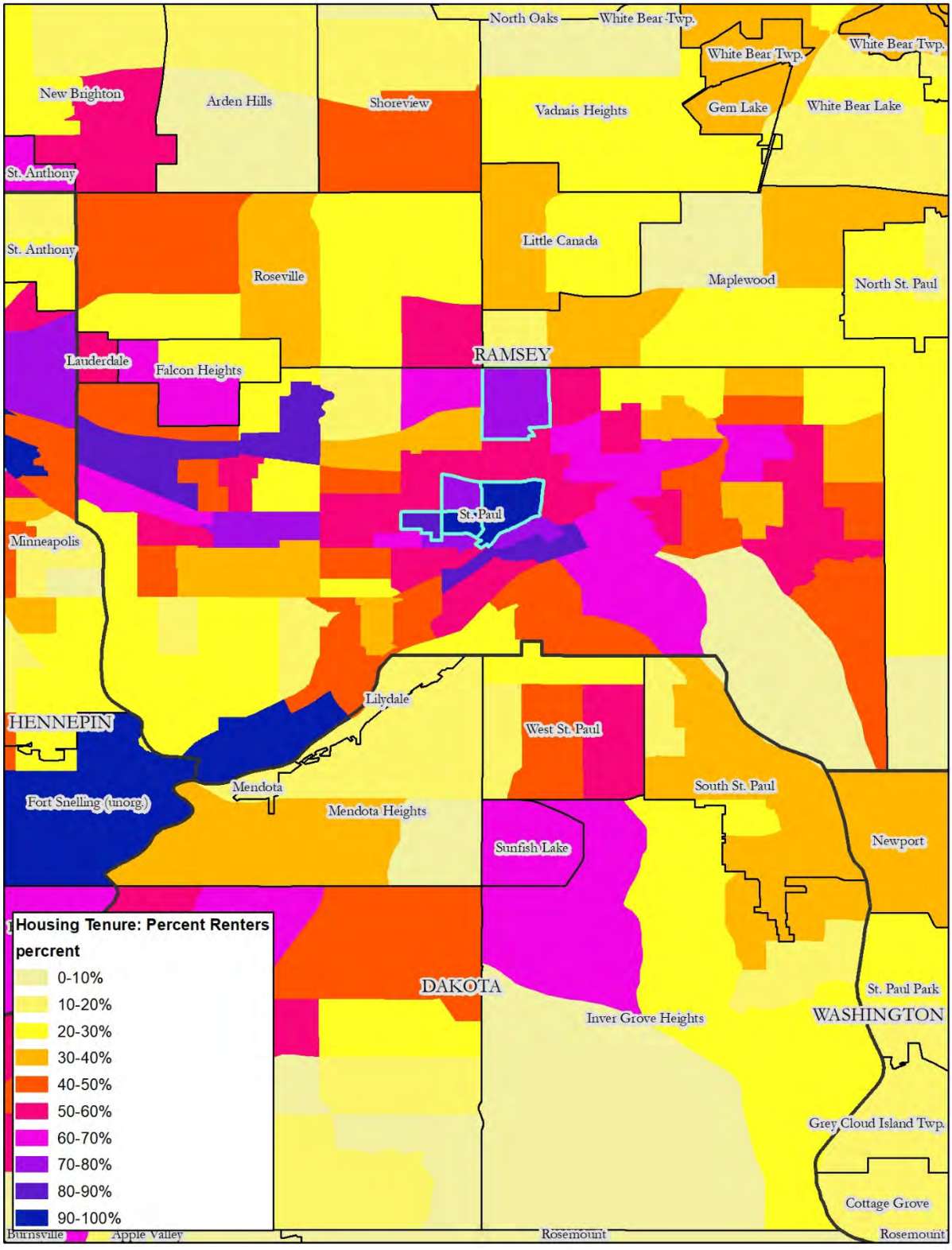
[218] *American Community Survey Estimates, 2013-2017.*

Map 42: Housing Tenure, Ramsey County[219]



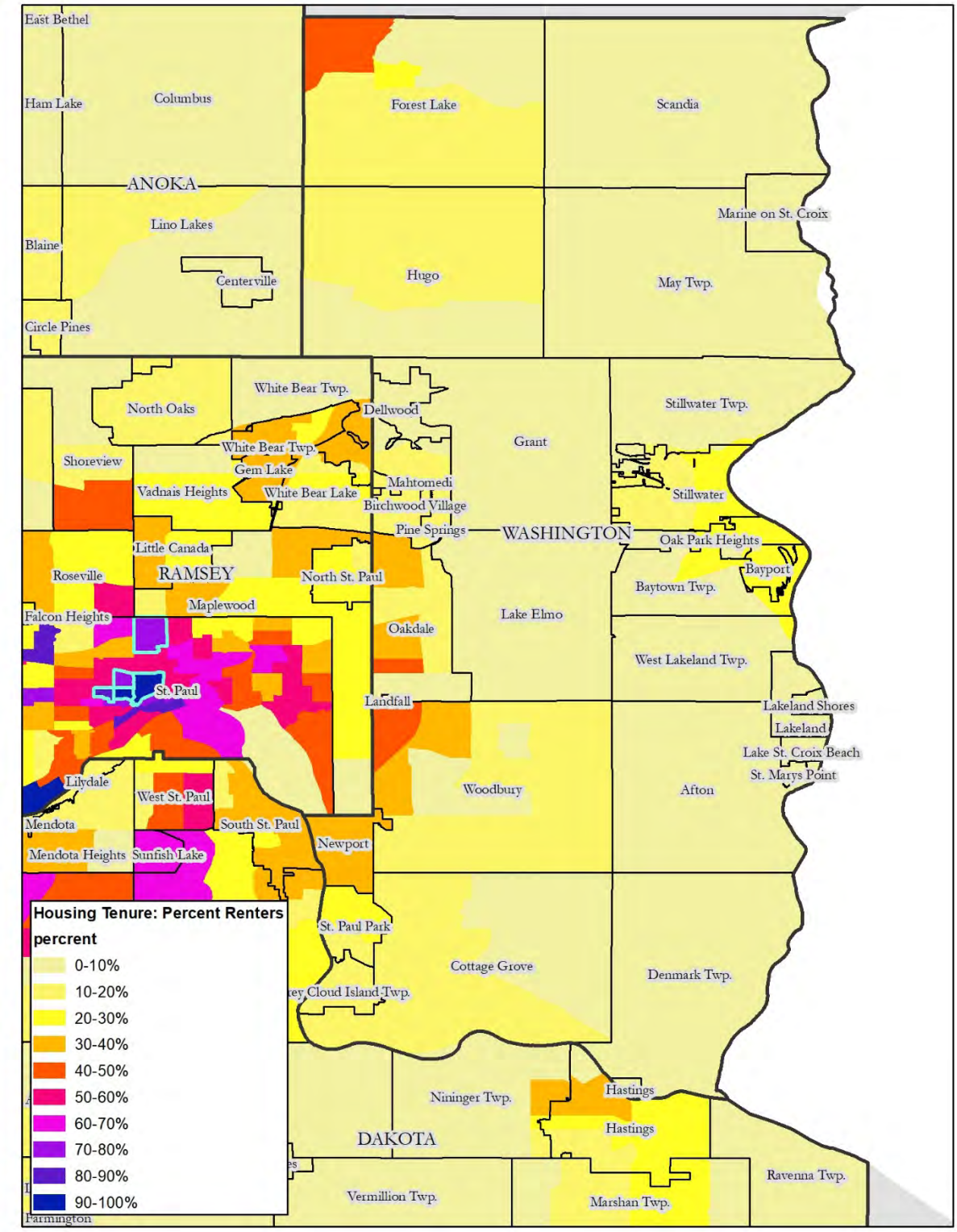
[219] *American Community Survey Estimates, 2013-2017.*

Map 43: Housing Tenure, St. Paul[220]



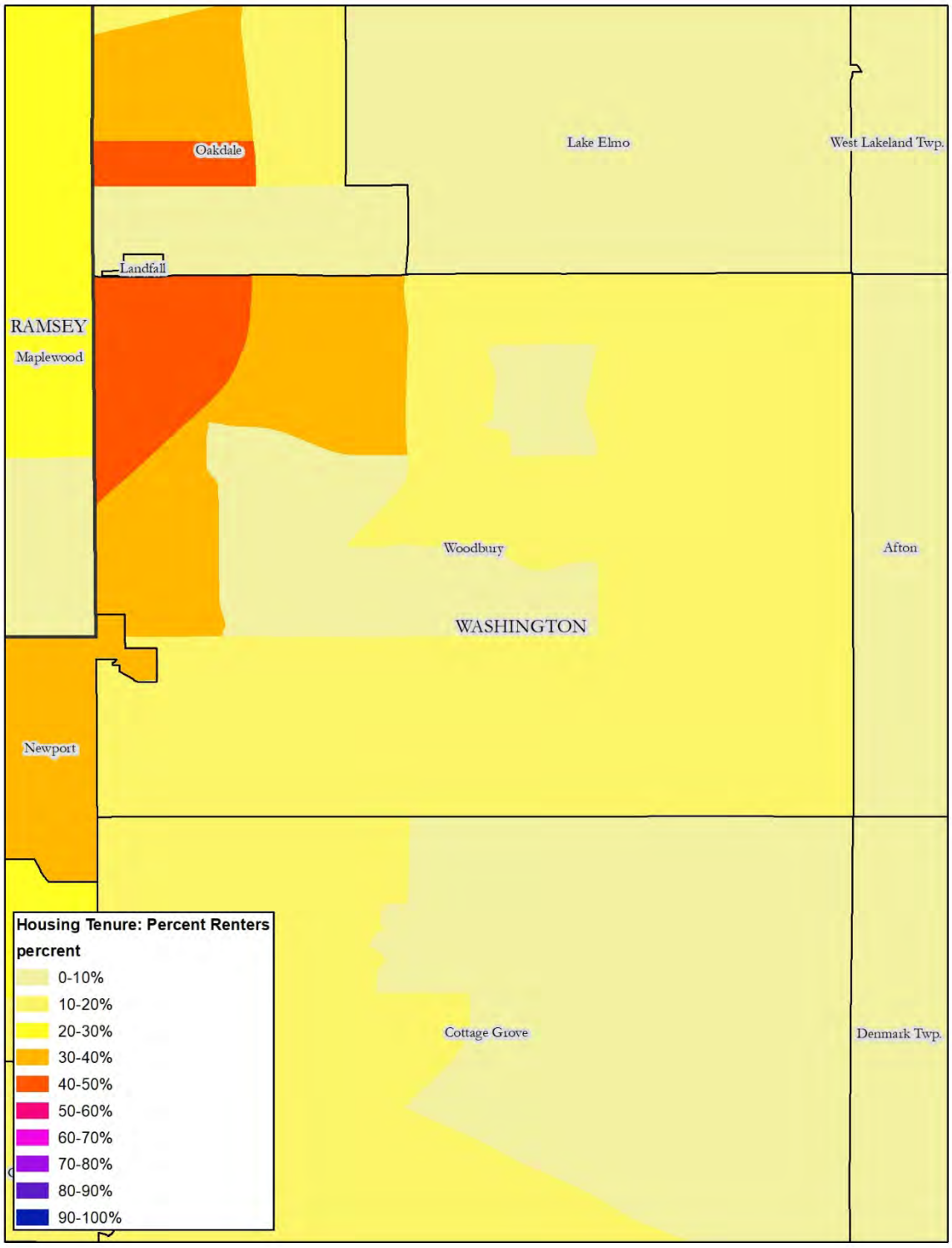
[220] *American Community Survey Estimates, 2013-2017.*

Map 44: Housing Tenure, Washington County[221]



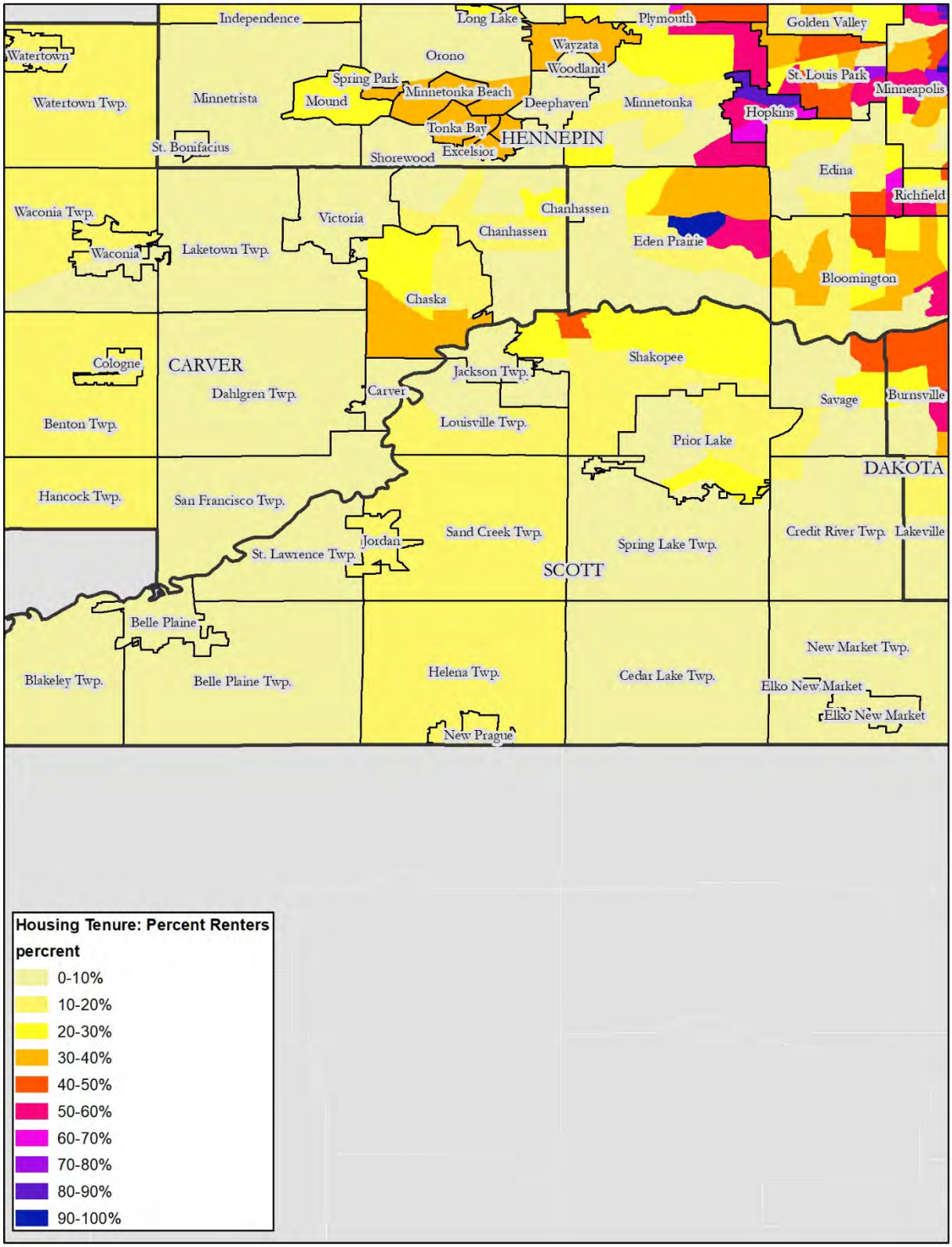
[221] *American Community Survey Estimates, 2013-2017.*

Map 45: Housing Tenure, Woodbury[222]



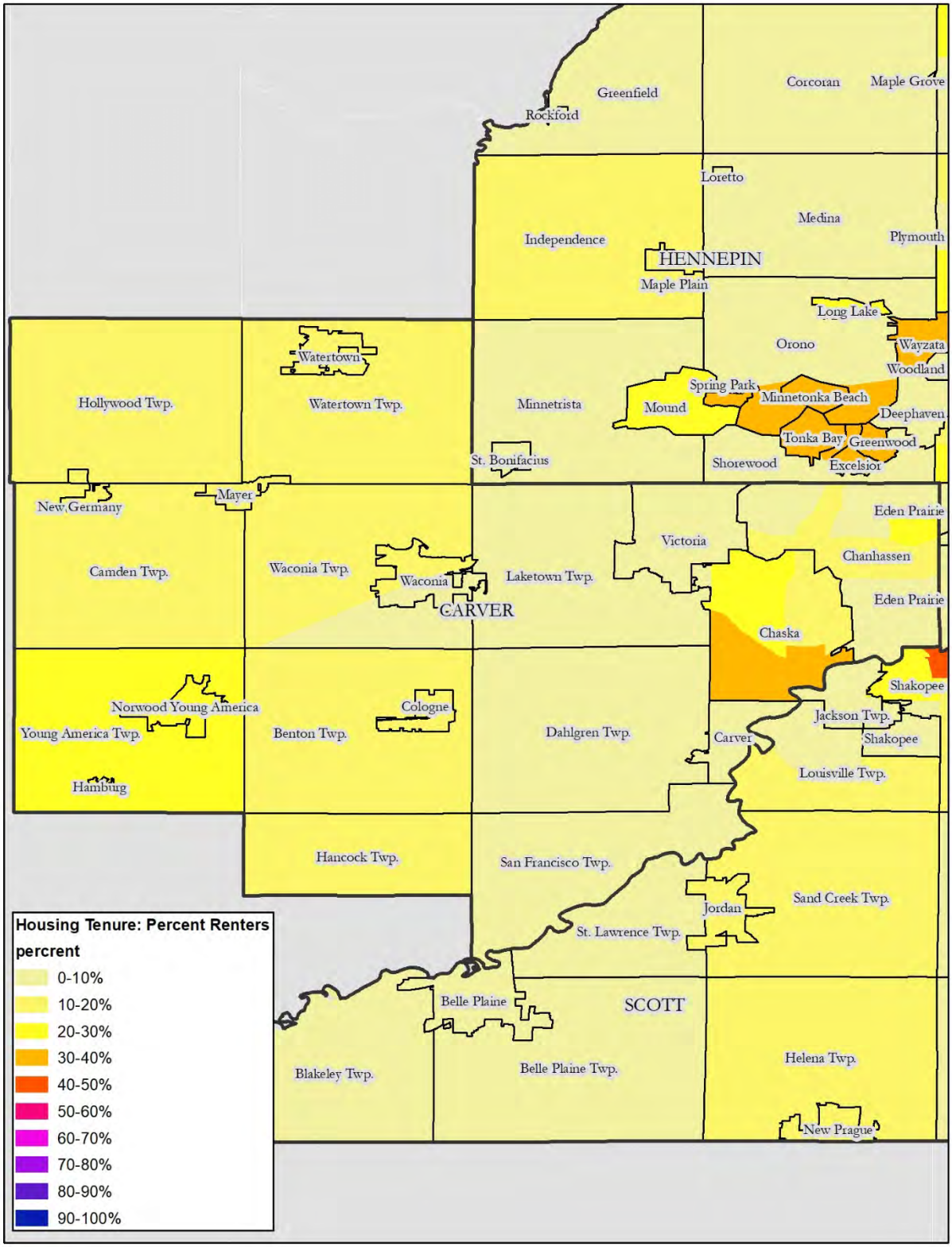
[222] *American Community Survey Estimates, 2013-2017.*

Map 46: Housing Tenure, Scott County[223]



[223] *American Community Survey Estimates, 2013-2017.*

Map 47: Housing Tenure, Carver County[224]

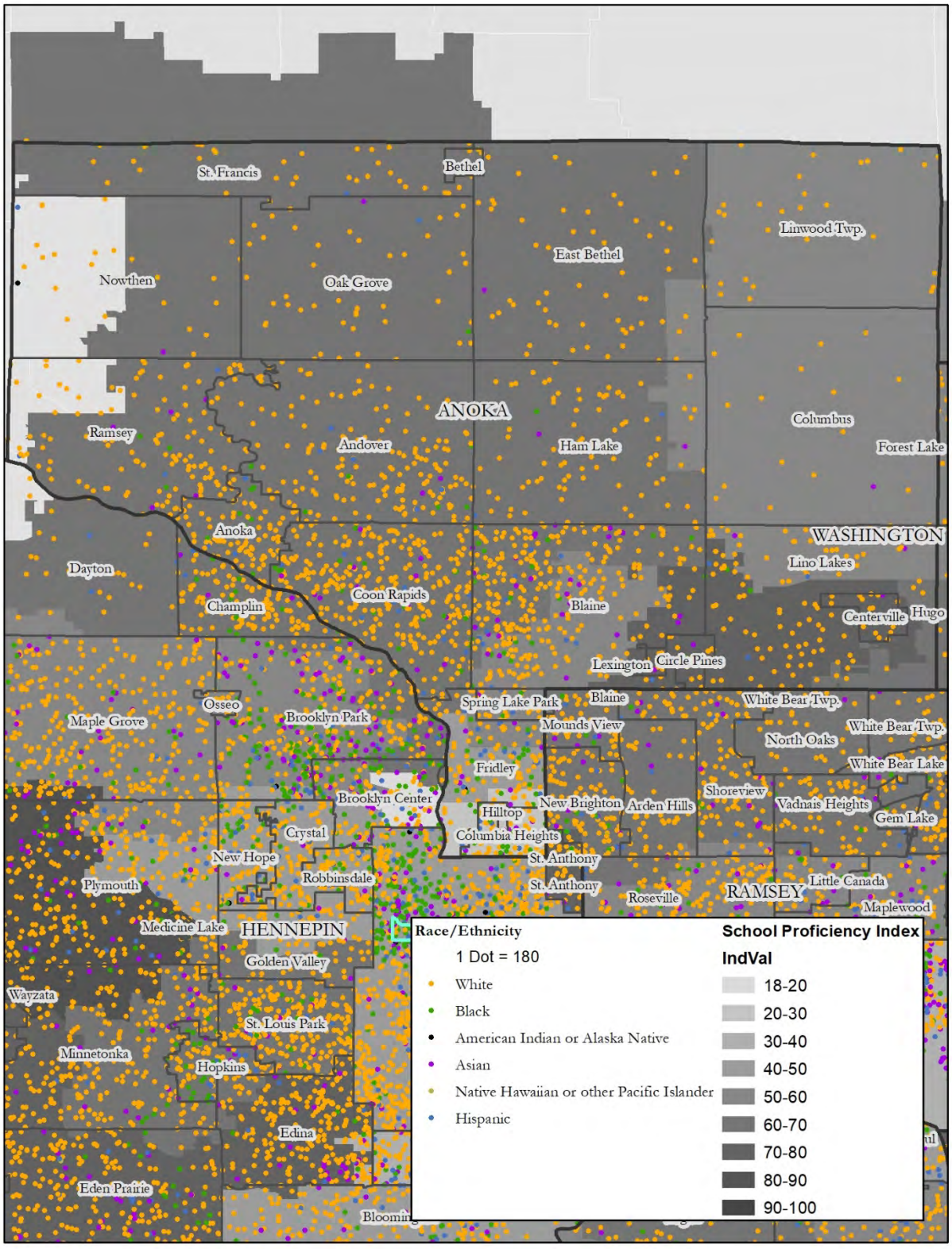


[224] *American Community Survey Estimates, 2013-2017.*

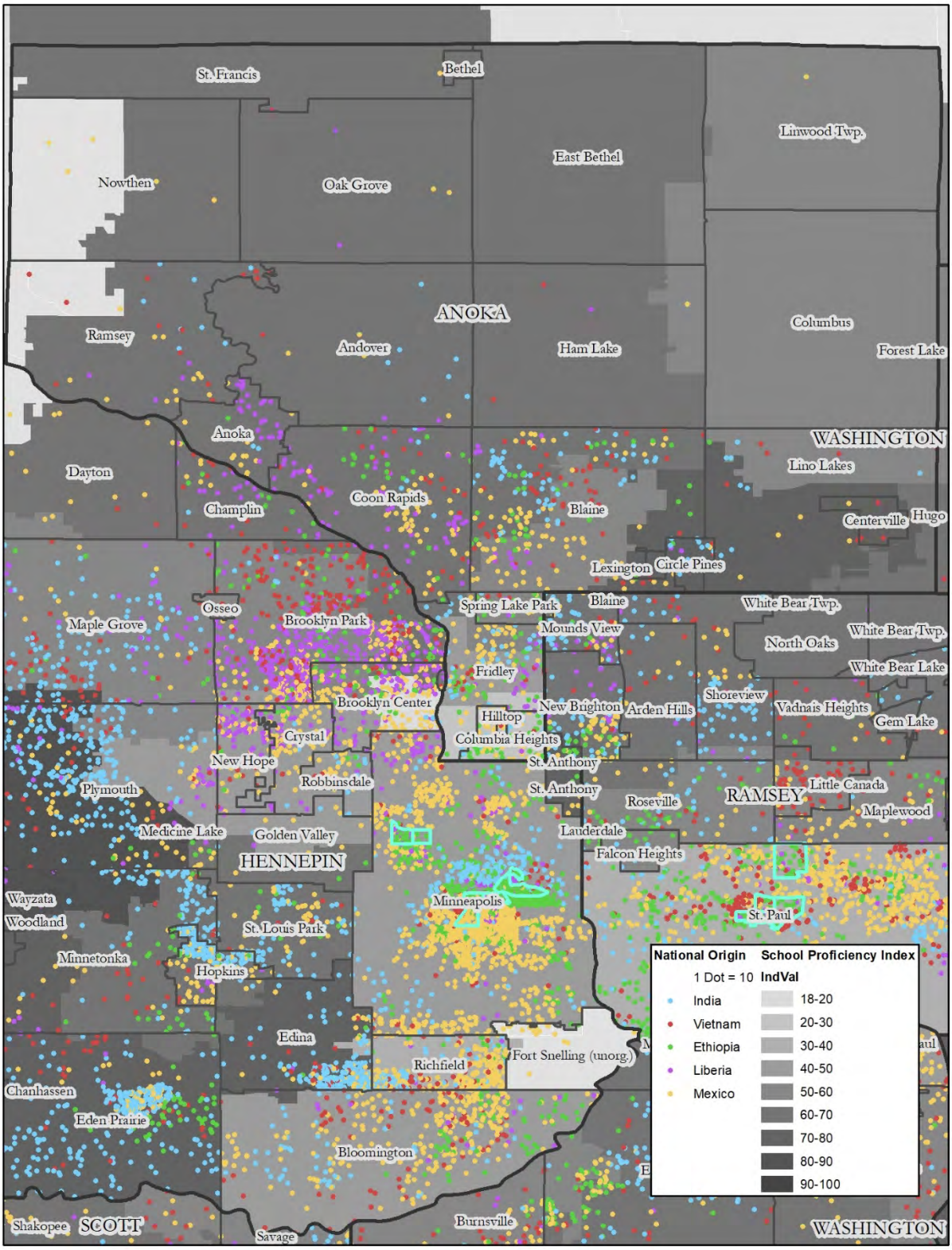
D. Disparities in Access to Opportunity Appendix

Please see the Data Documentation for in-depth explanations and sources of each map.

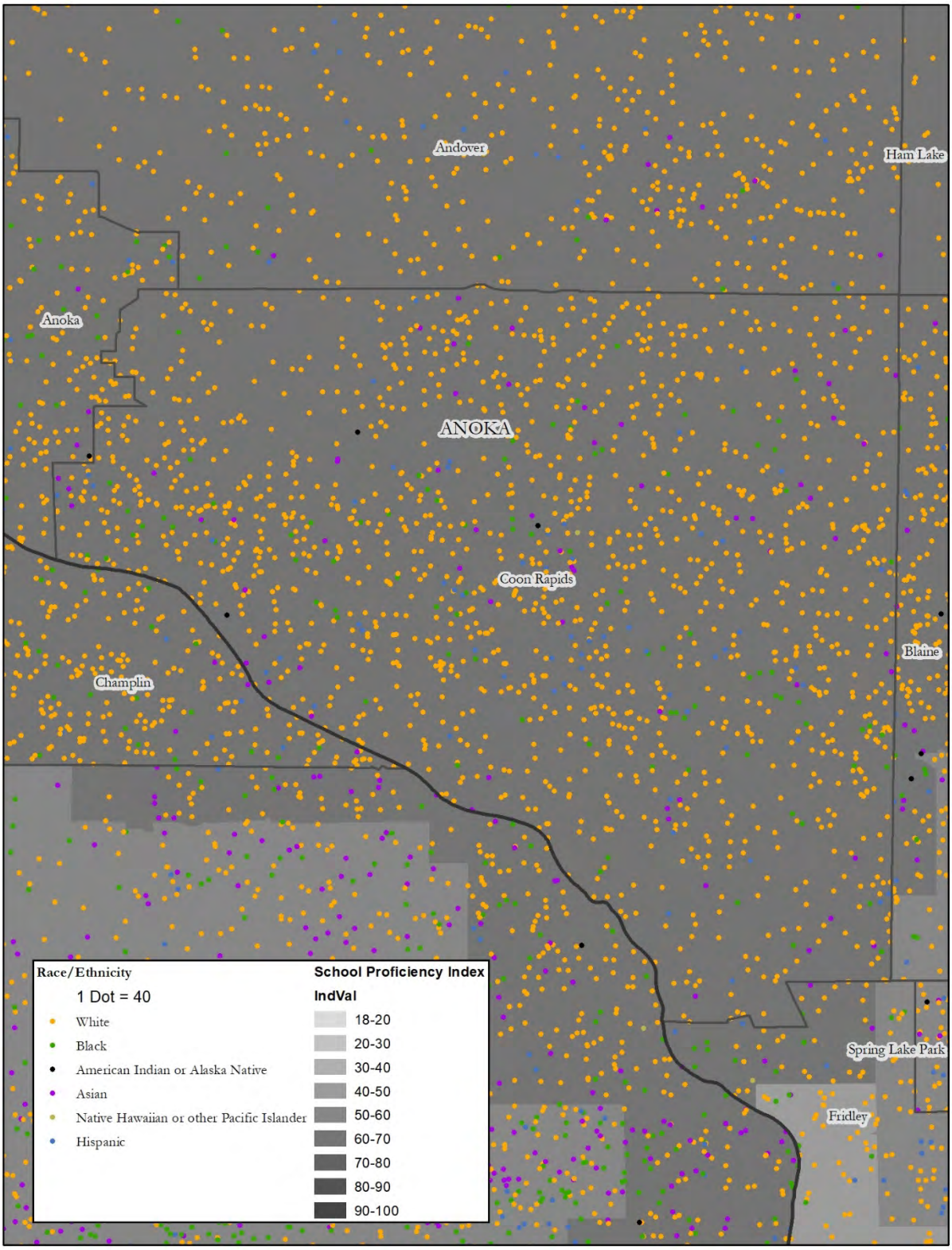
Map 1: Anoka County, Race, School Proficiency



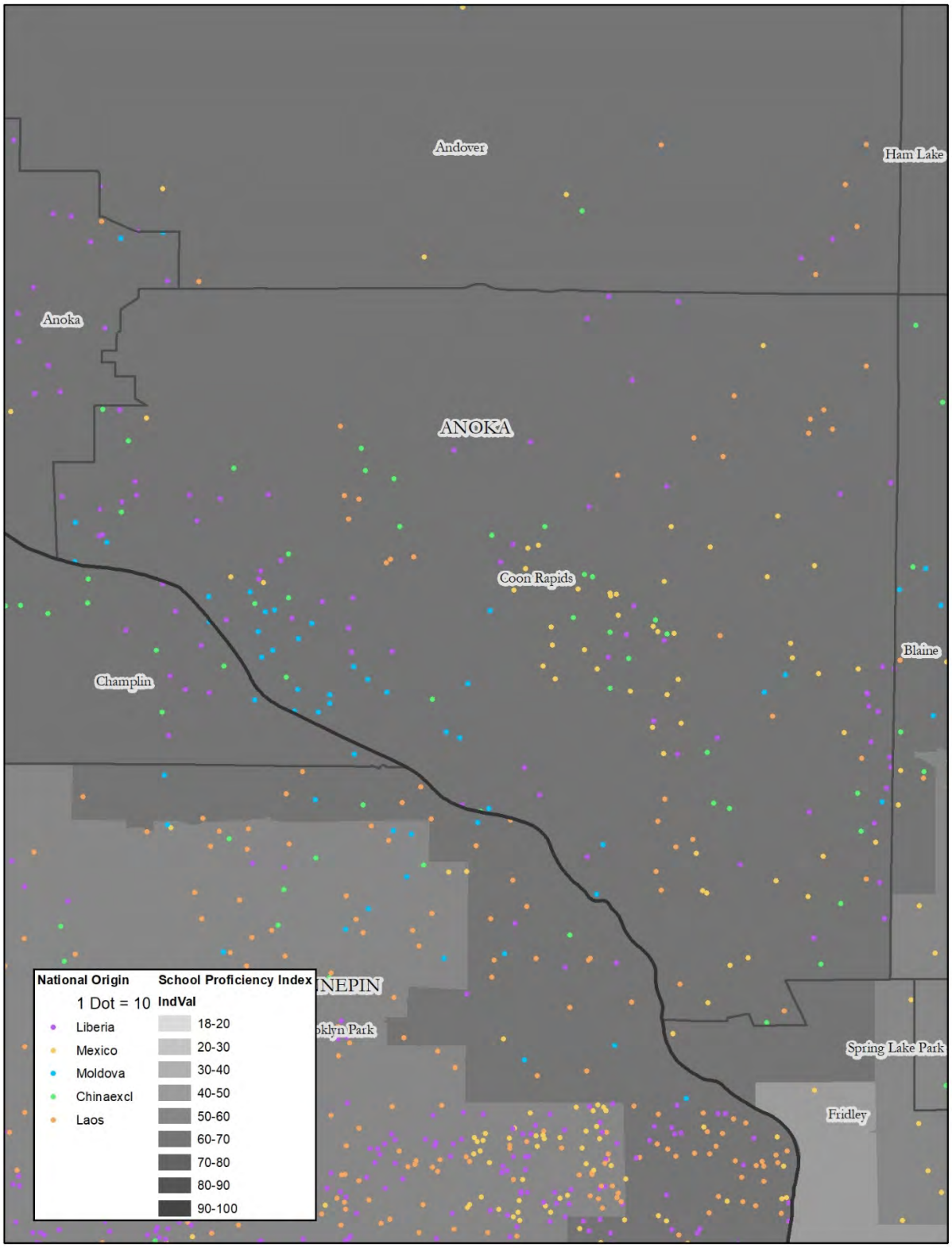
Map 2: Anoka County, National Origin, School Proficiency



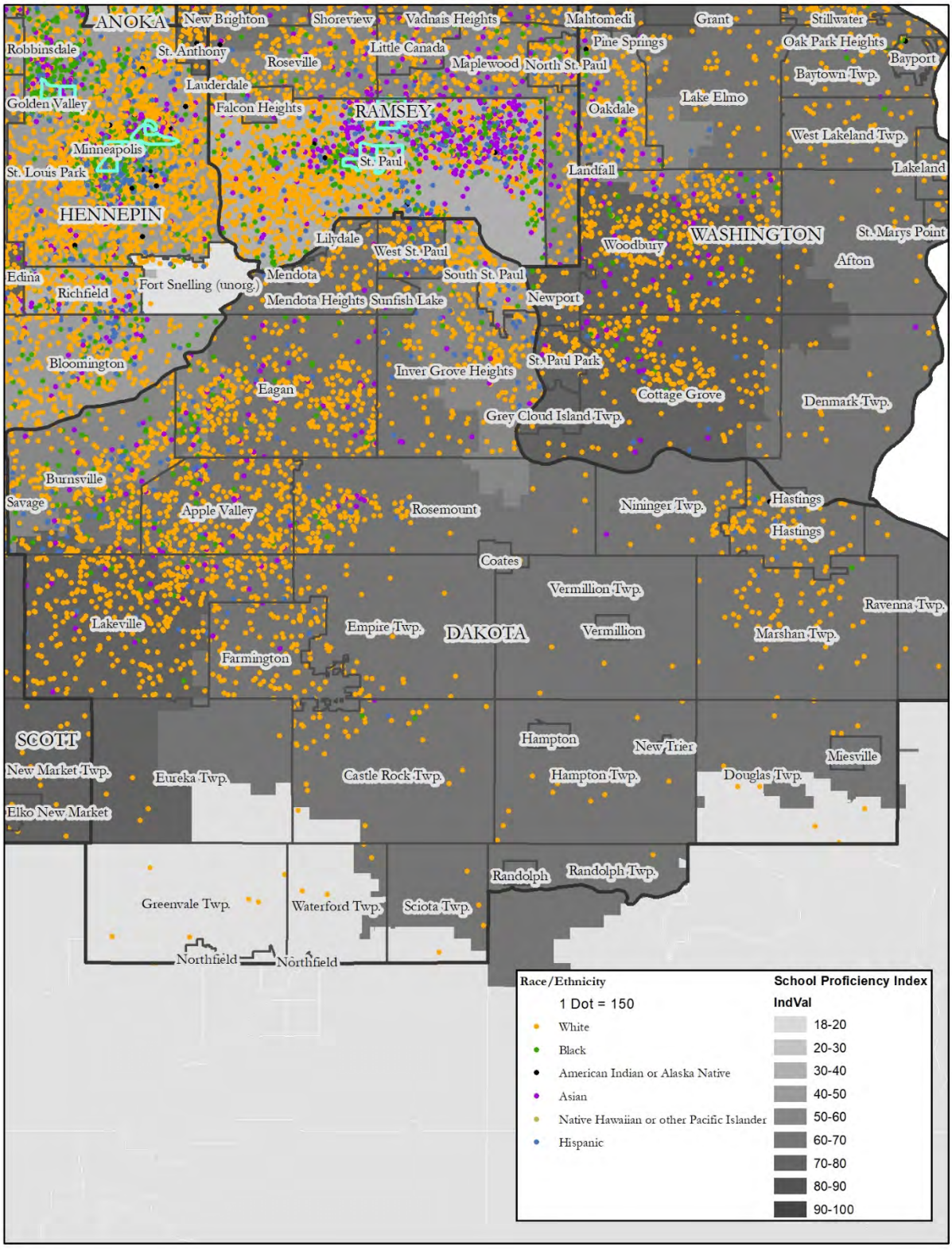
Map 3: Coon Rapids, Race, School Proficiency



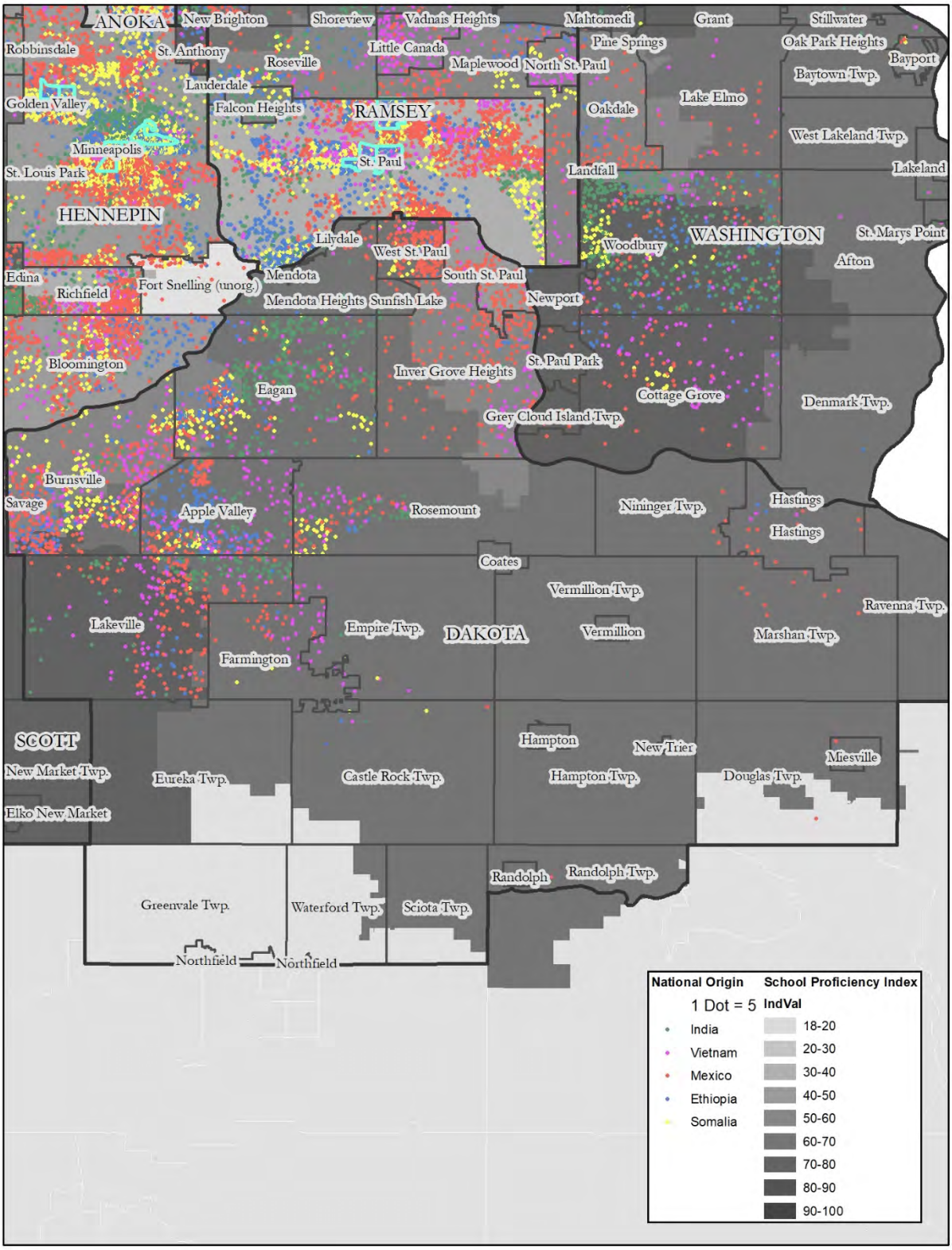
Map 4: Coon Rapids, National Origin, School Proficiency



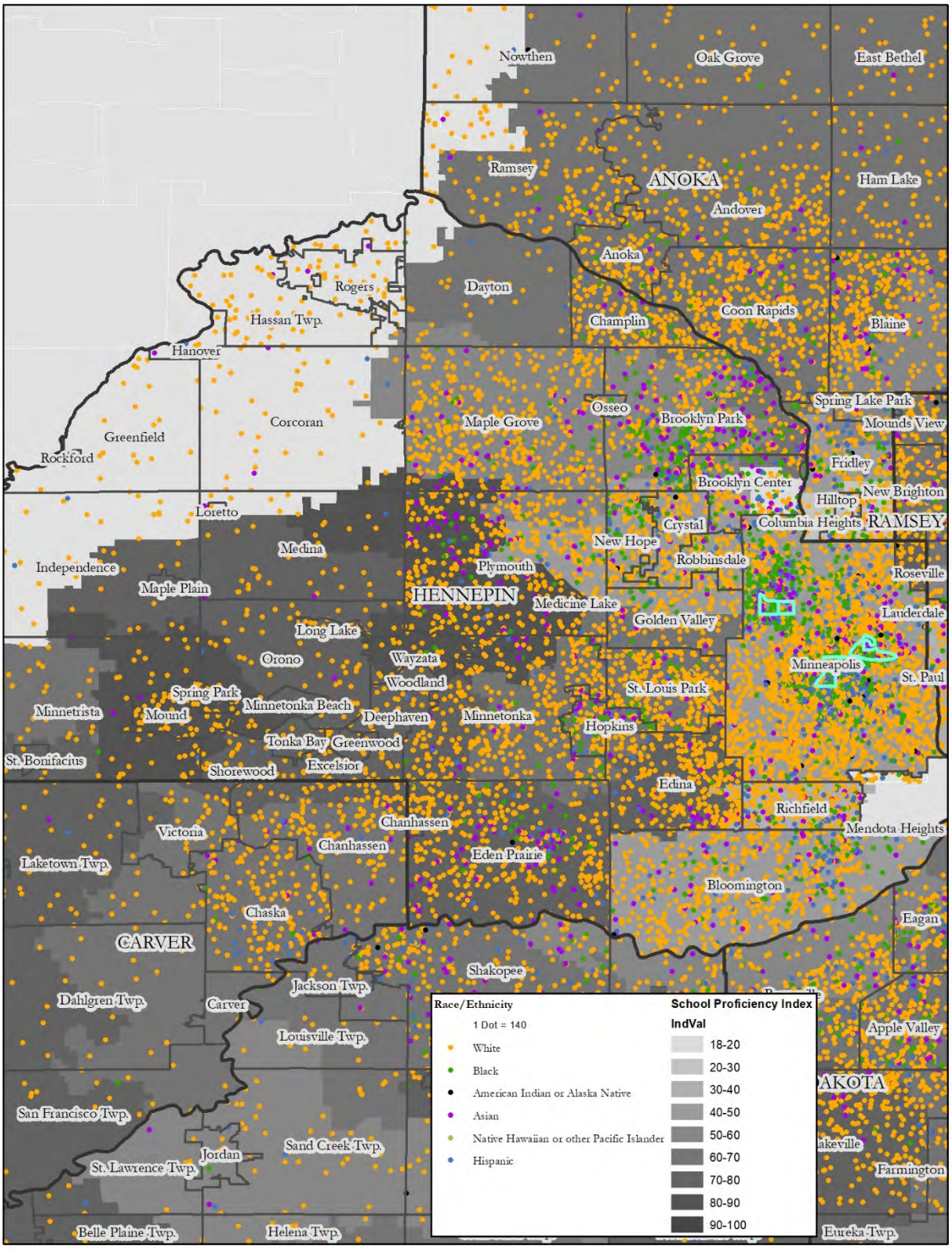
Map 5: Dakota County, Race, School Proficiency



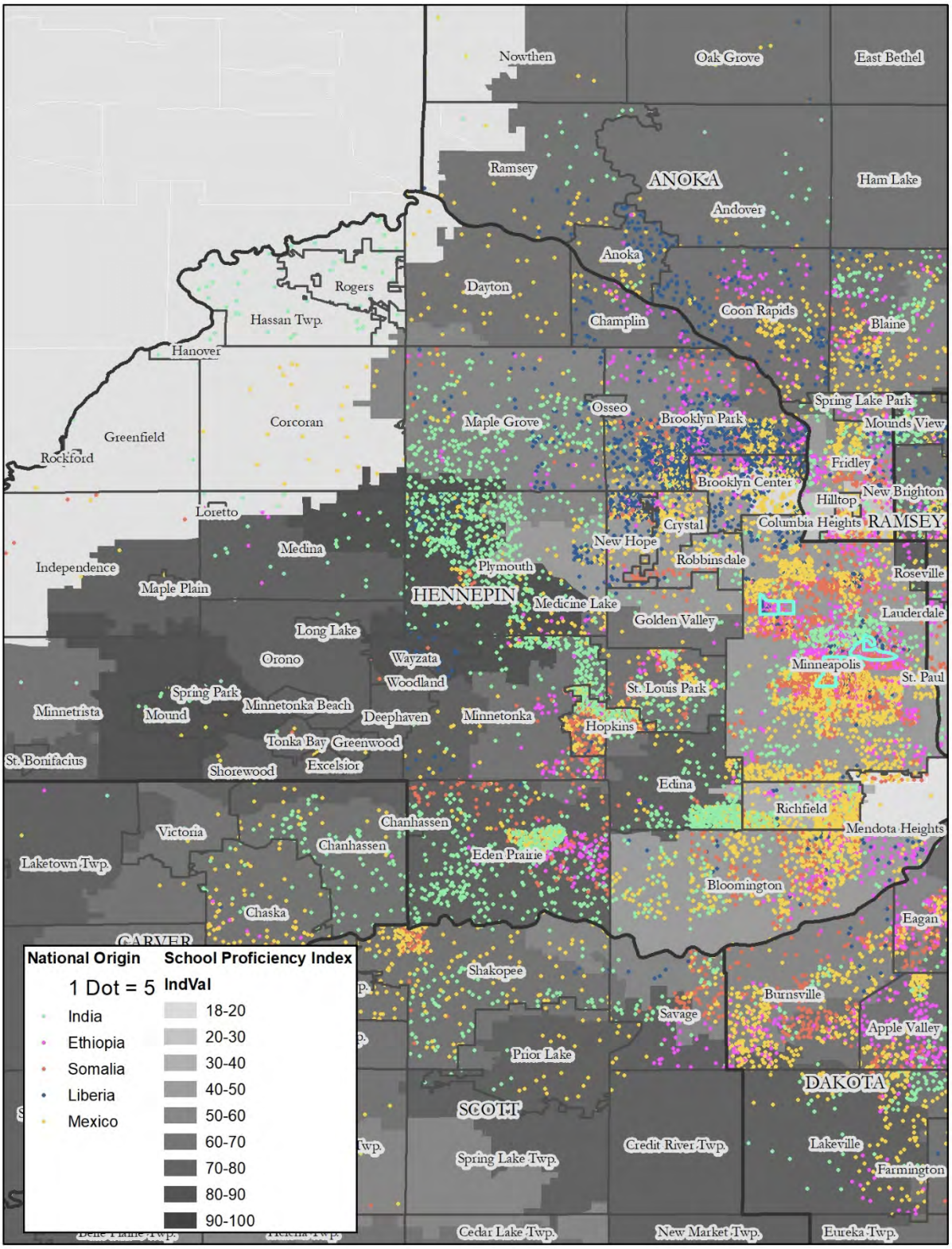
Map 6: Dakota County, National Origin, School Proficiency



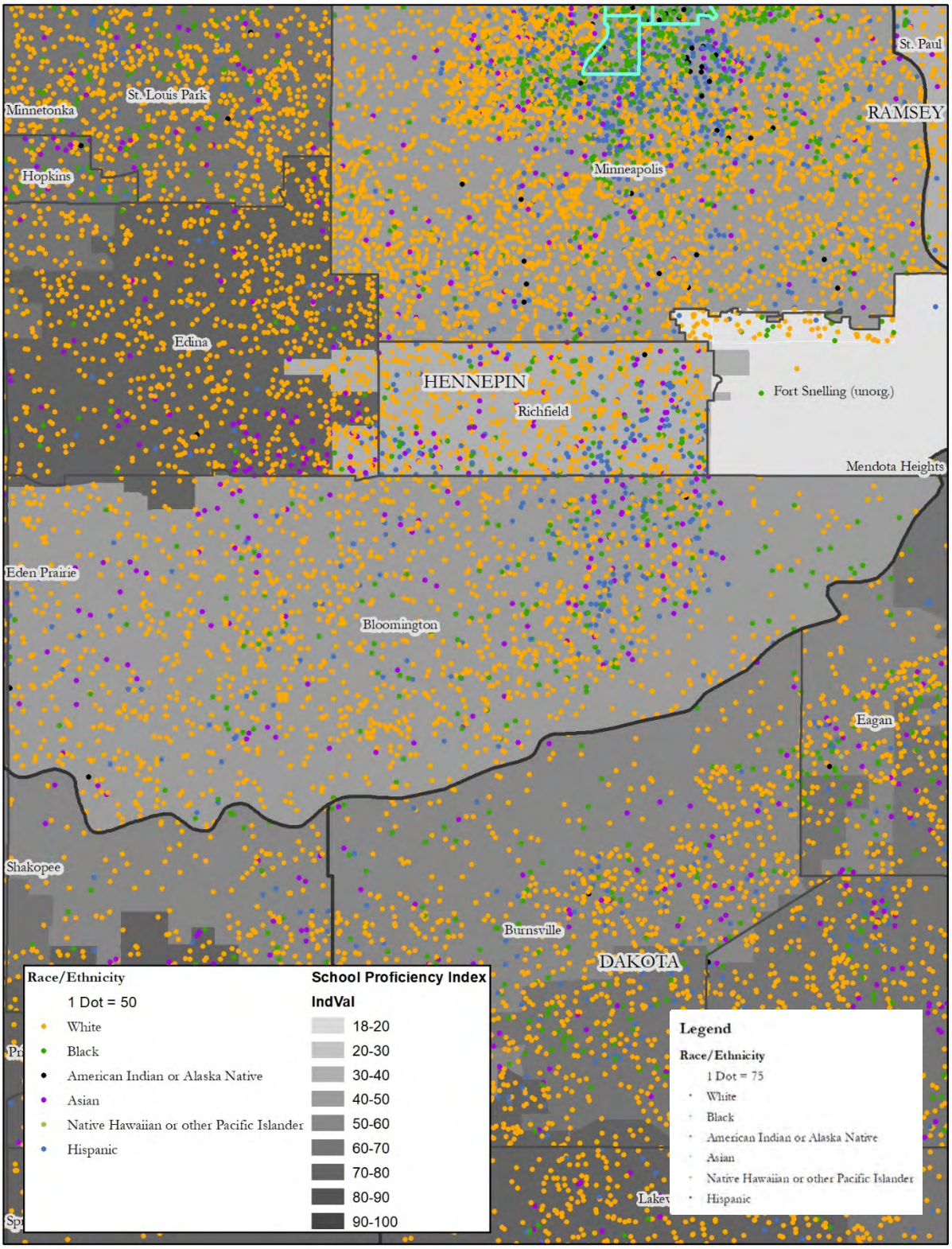
Map 7: Hennepin County, Race, School Proficiency



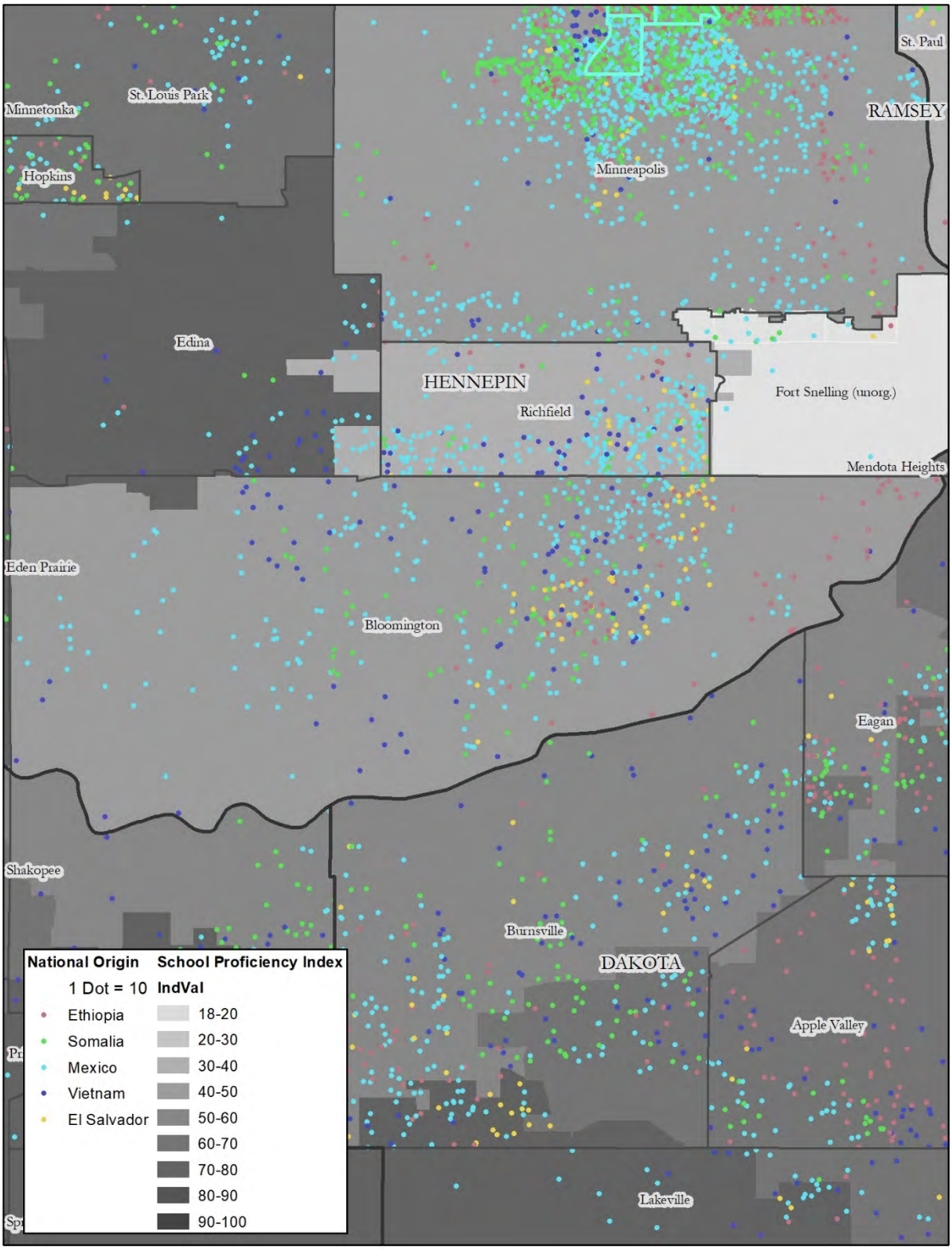
Map 8: Hennepin County, National Origin, School Proficiency



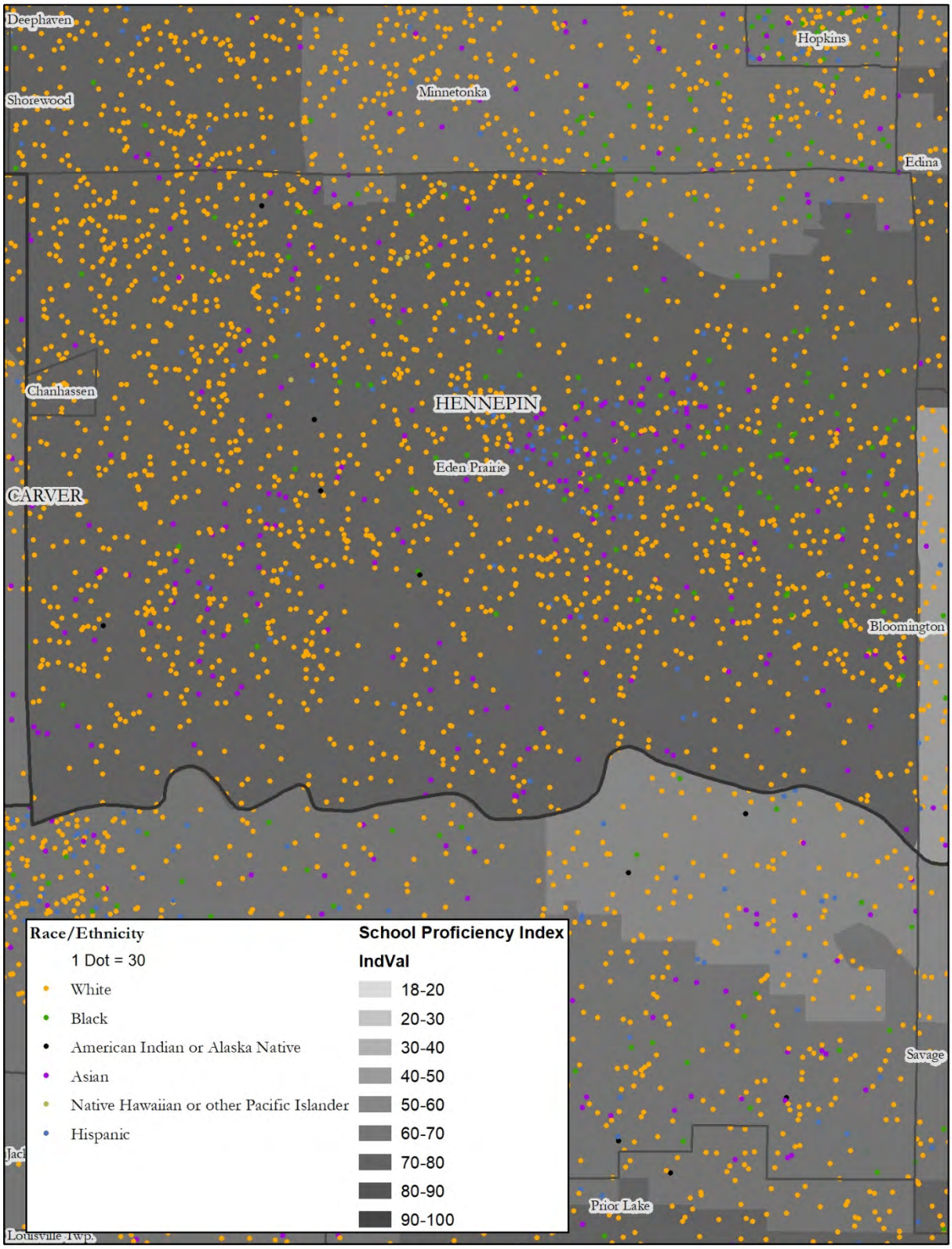
Map 9: Bloomington, Race, School Proficiency



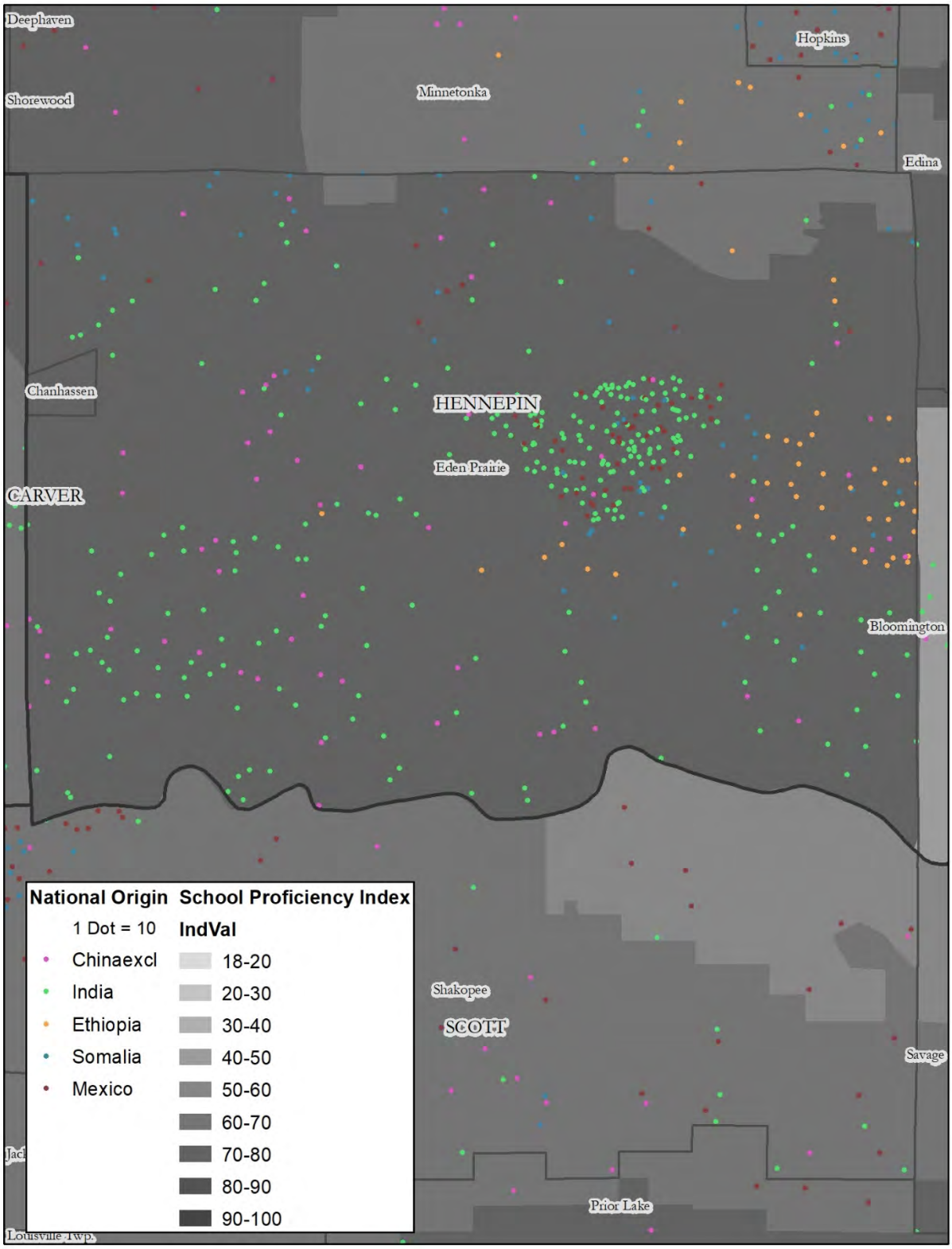
Map 10: Bloomington, National Origin, School Proficiency



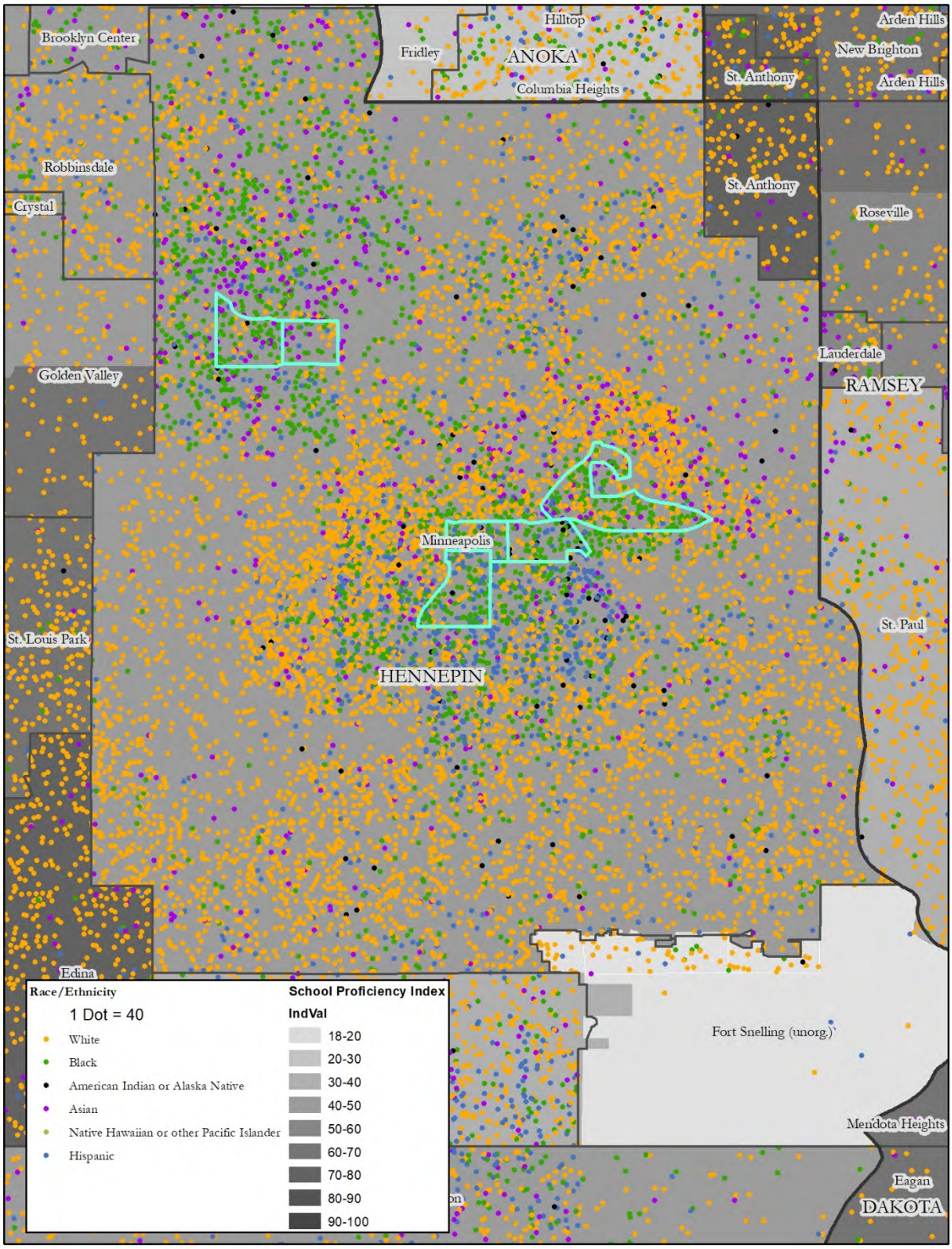
Map 11: Eden Prairie, Race, School Proficiency



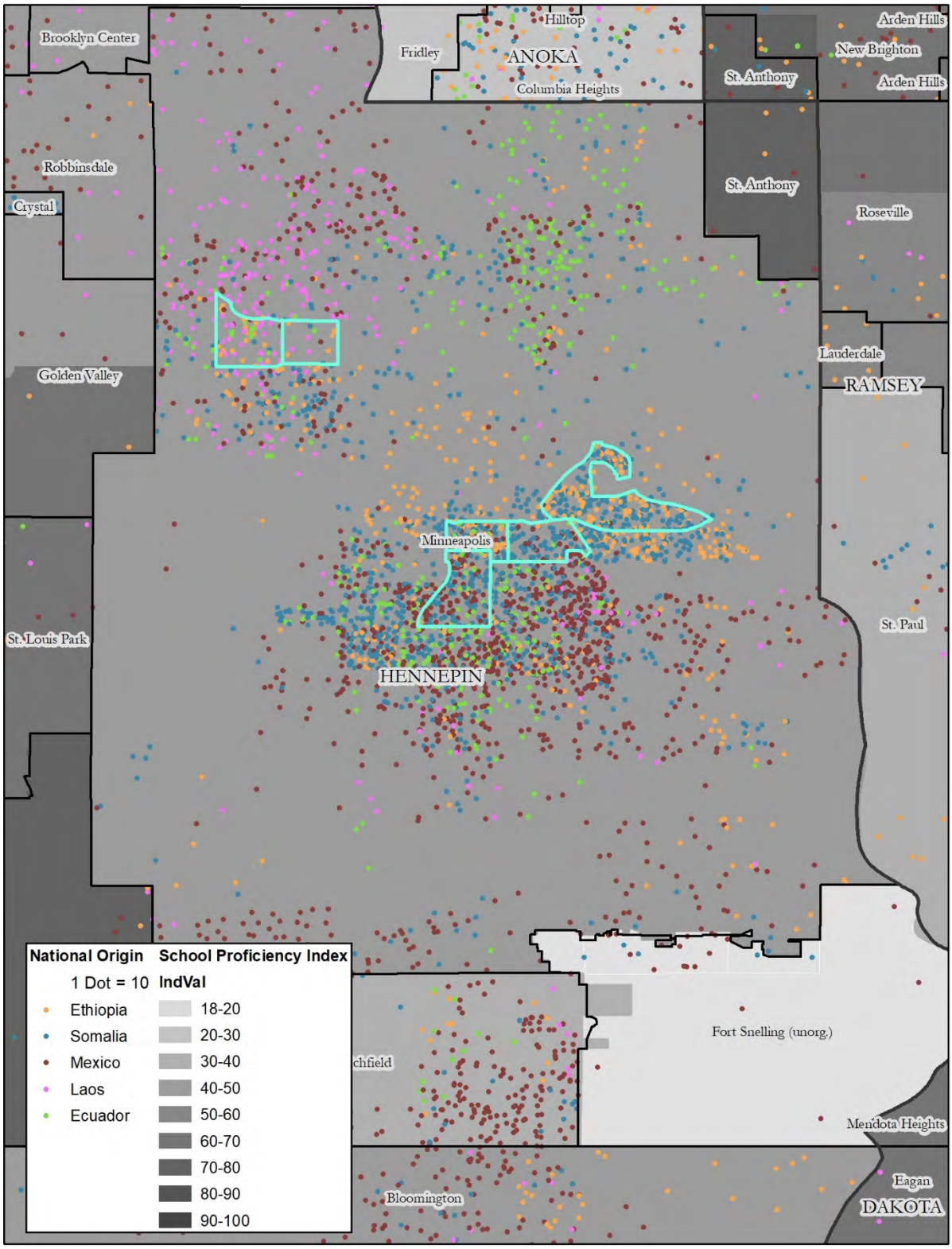
Map 12: Eden Prairie, National Origin, School Proficiency



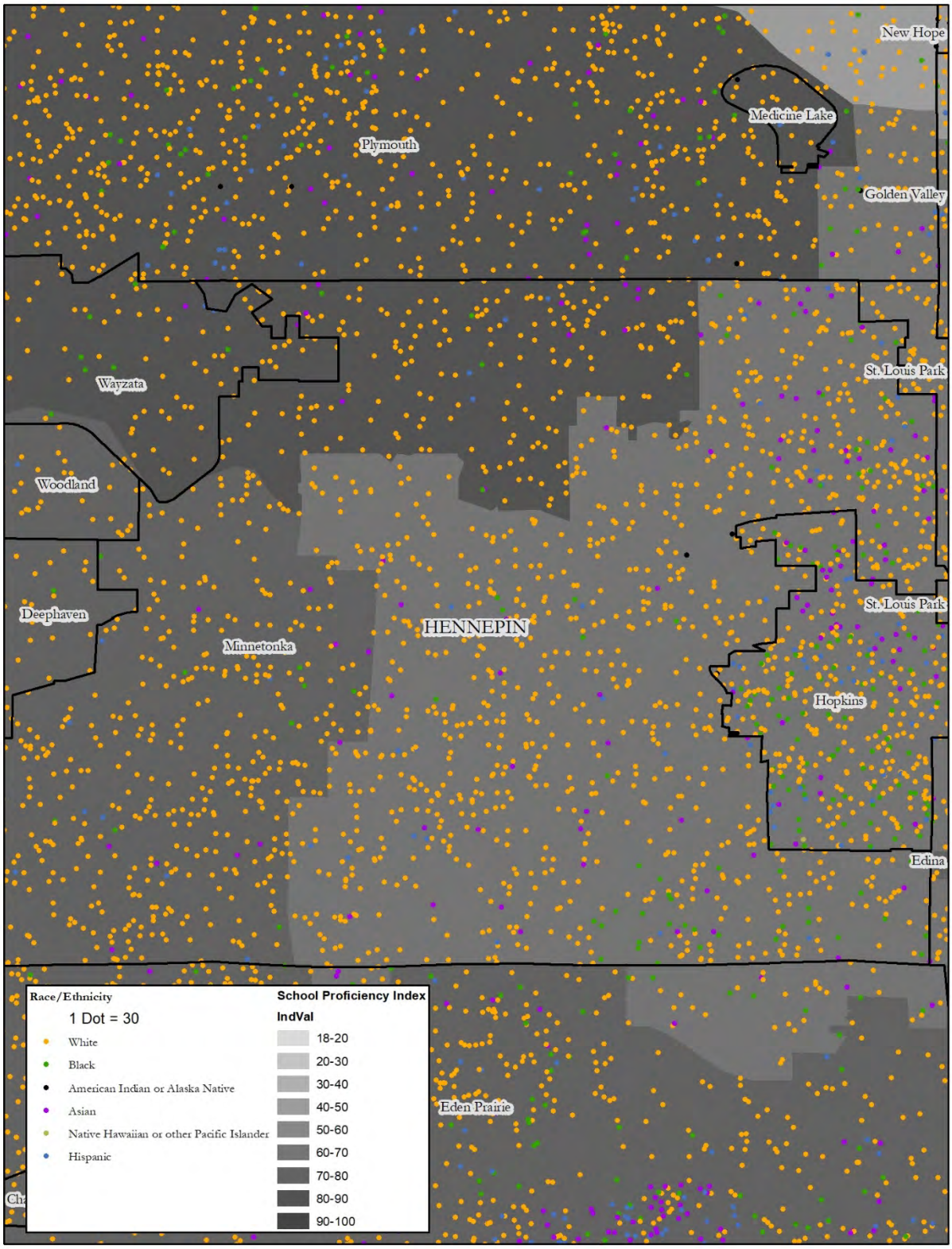
Map 13: Minneapolis, Race, School Proficiency



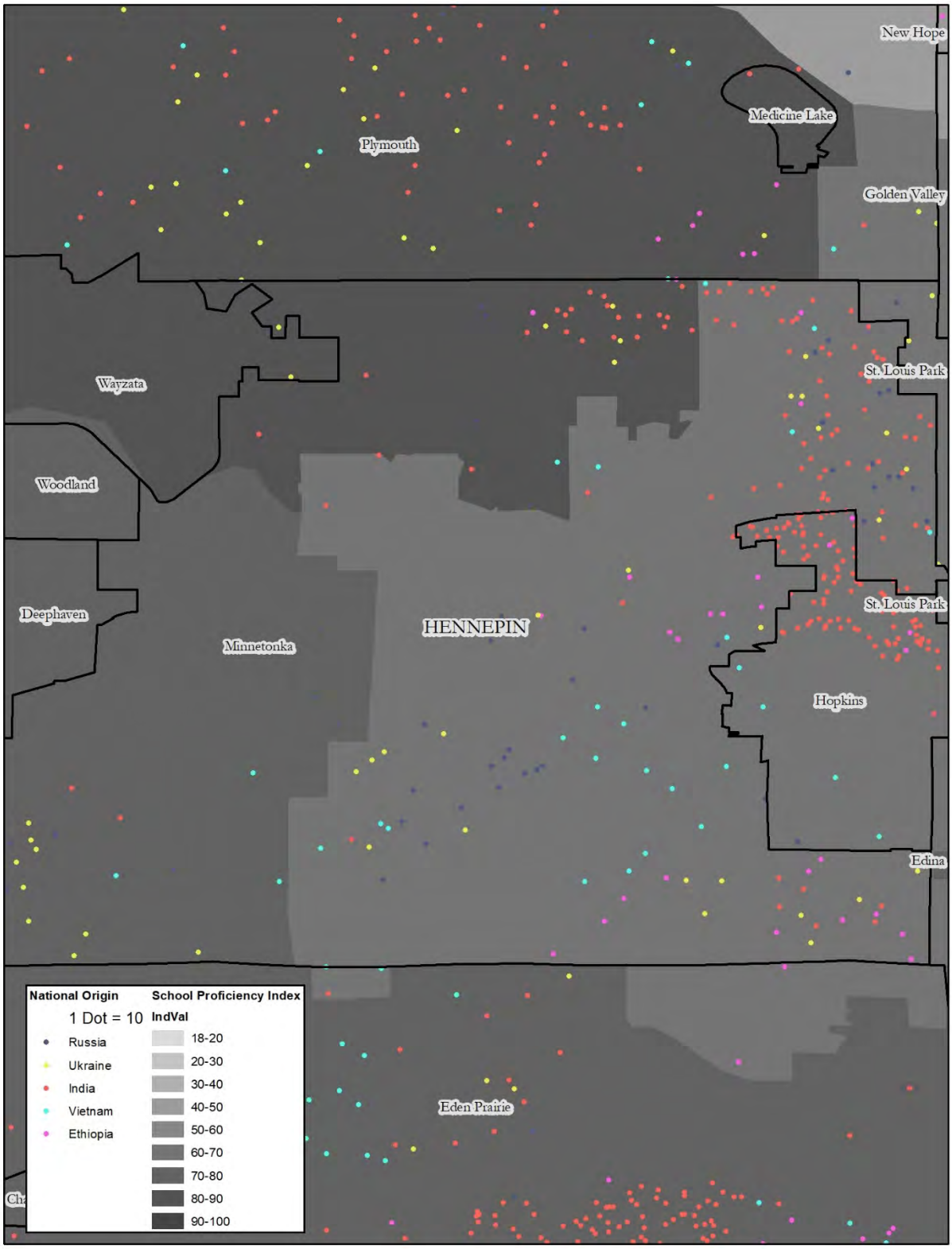
Map 14: Minneapolis, National Origin, School Proficiency



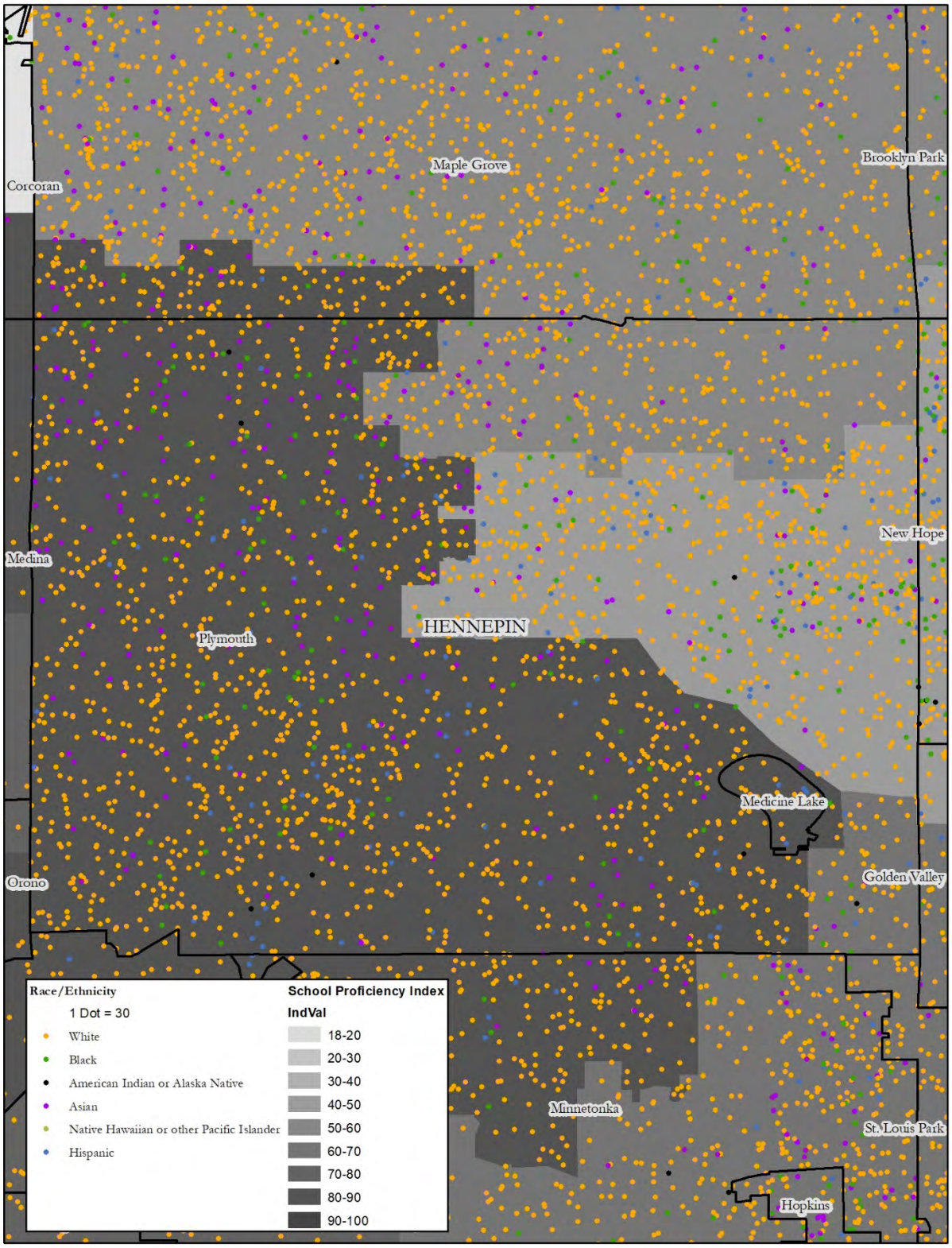
Map 15: Minnetonka, Race, School Proficiency



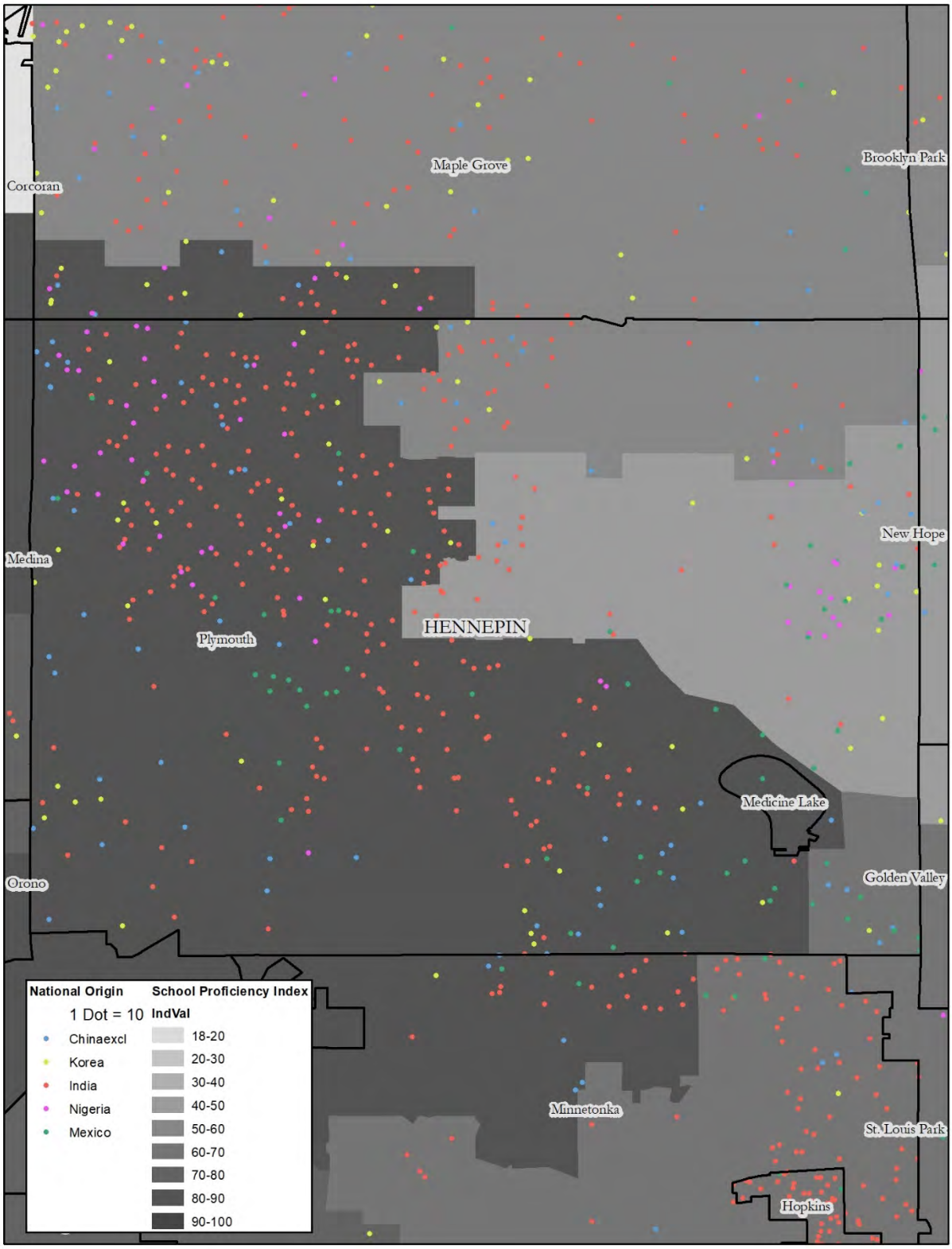
Map 16: Minnetonka, National Origin, School Proficiency



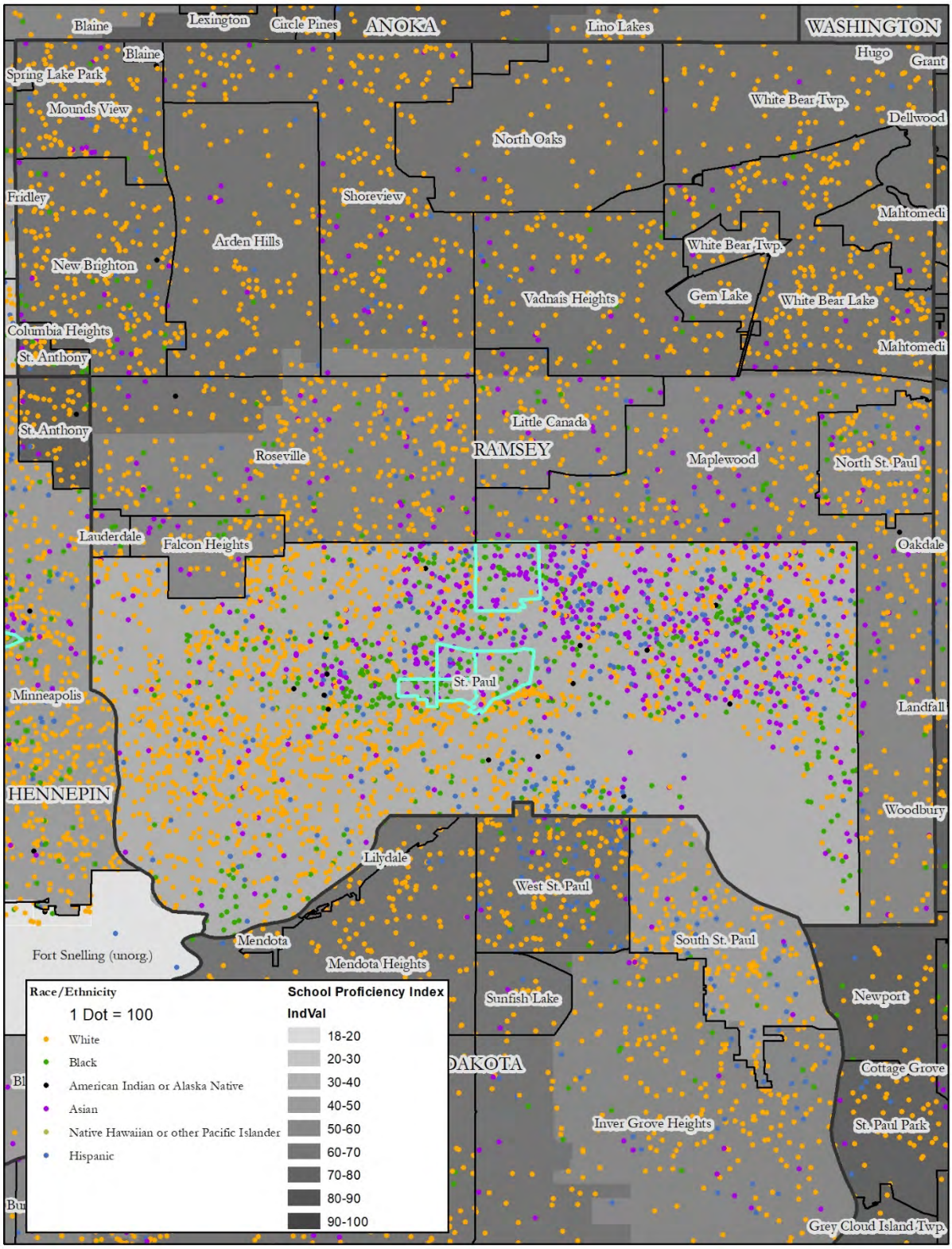
Map 17: Plymouth, Race, School Proficiency



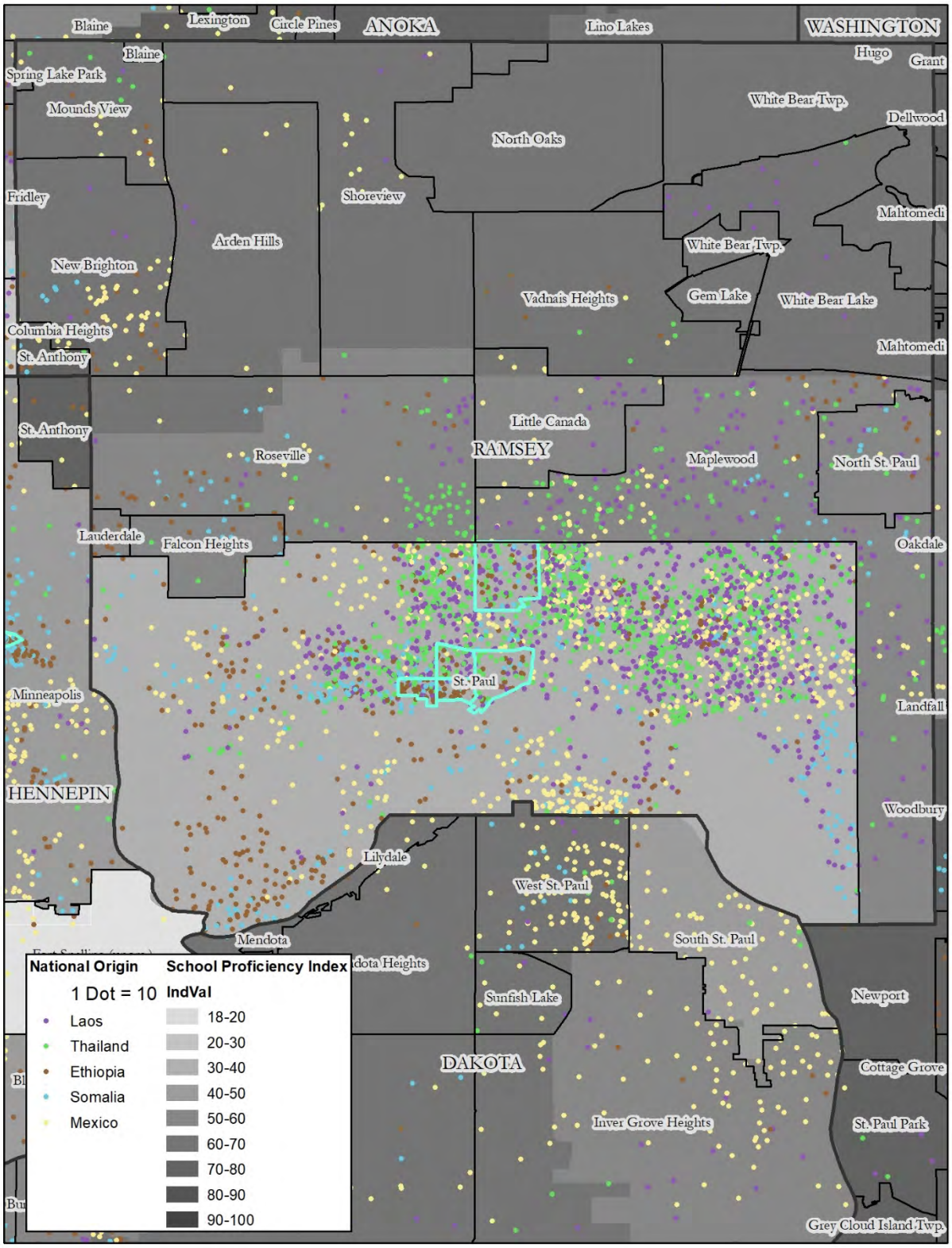
Map 18: Plymouth, National Origin, School Proficiency



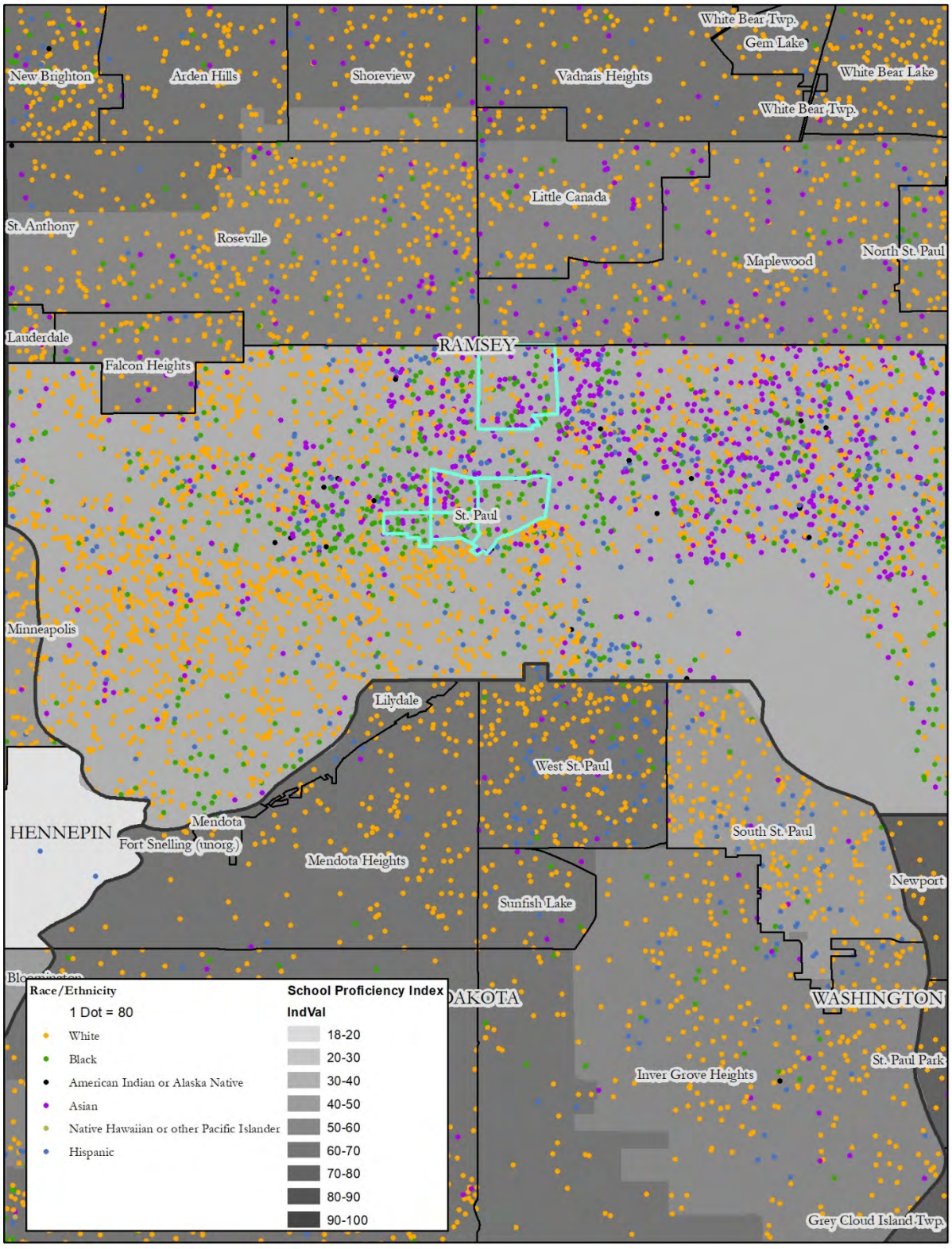
Map 19: Ramsey County, Race, School Proficiency



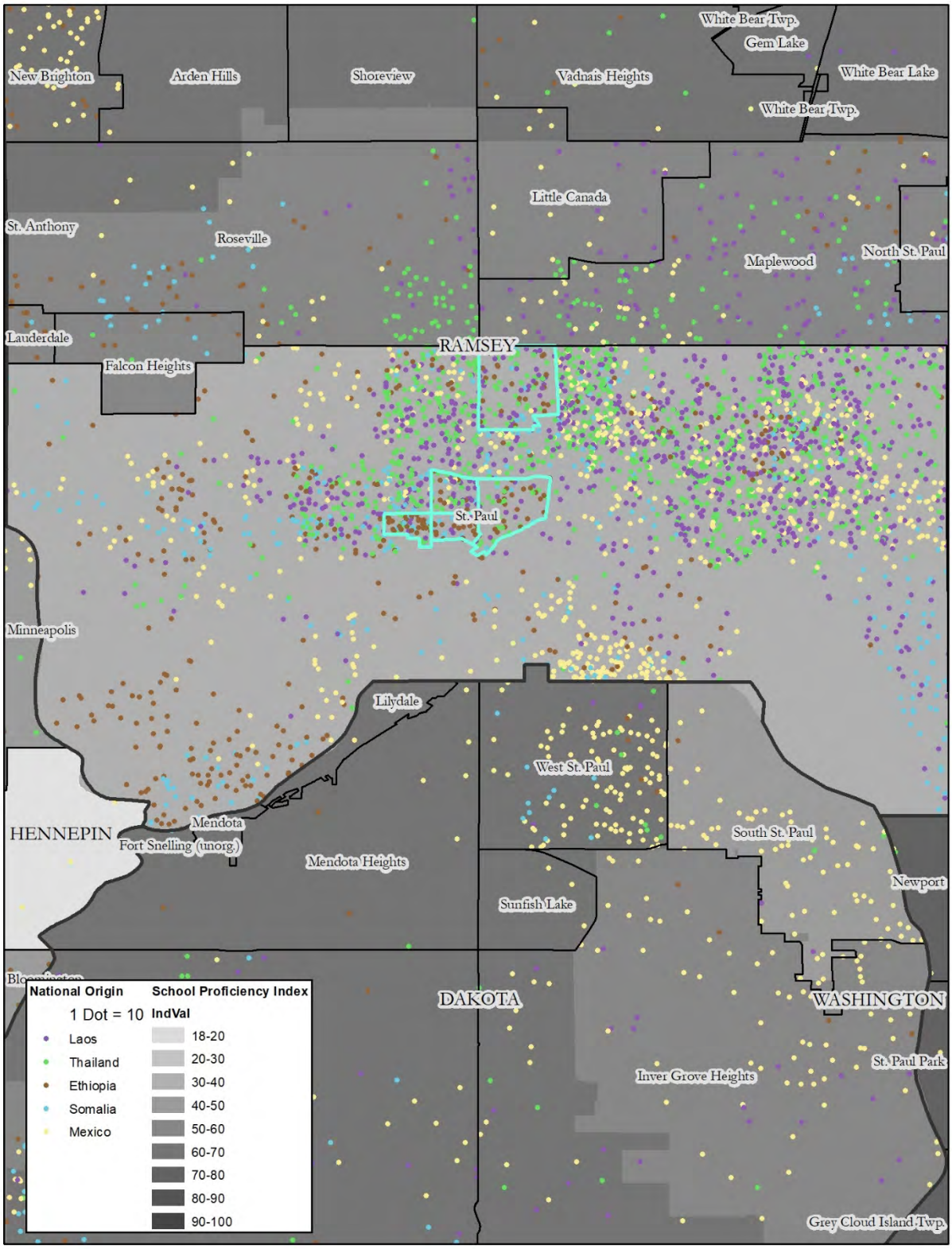
Map 20: Ramsey County, National Origin, School Proficiency



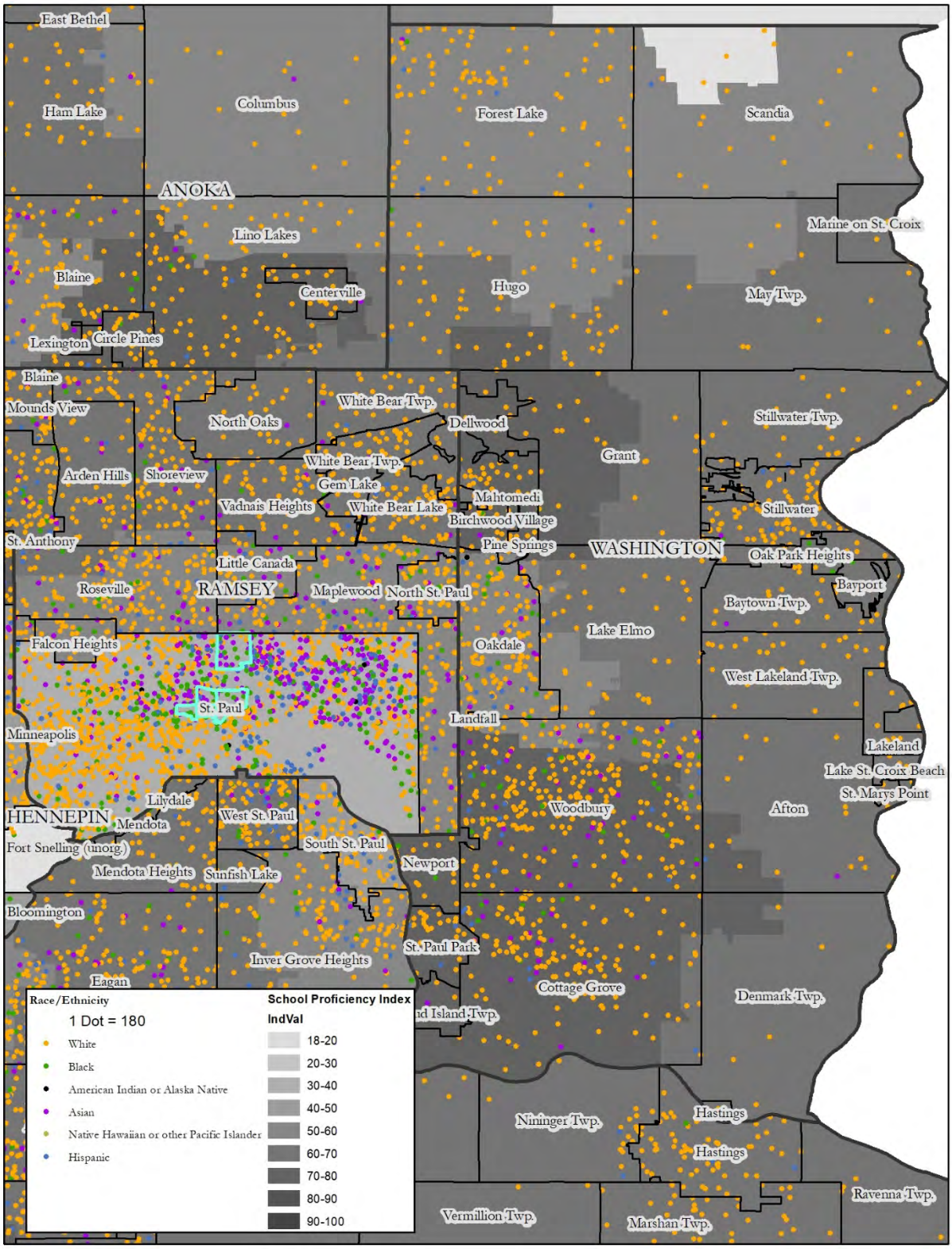
Map 21: St. Paul, Race, School Proficiency



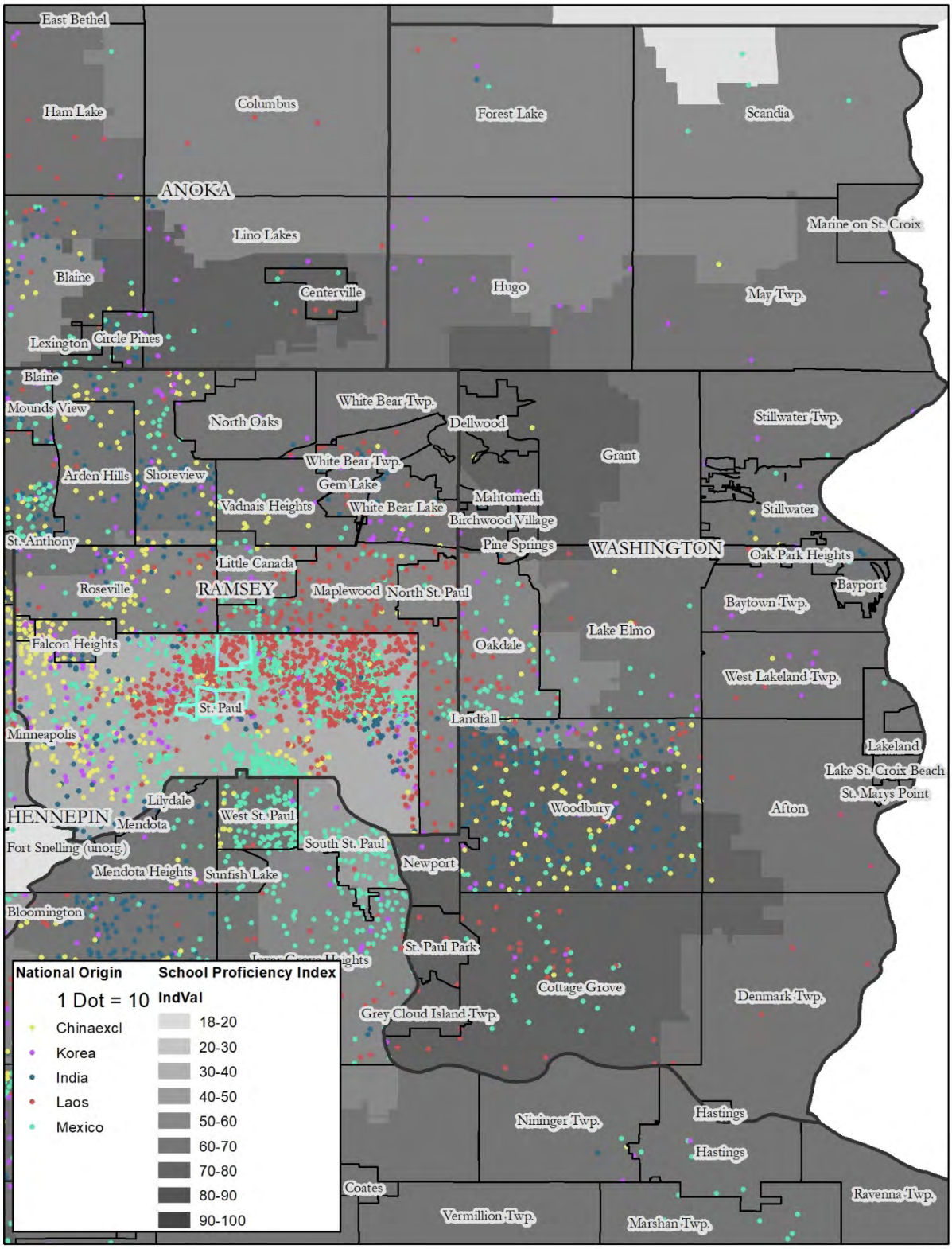
Map 22: St. Paul, National Origin, School Proficiency



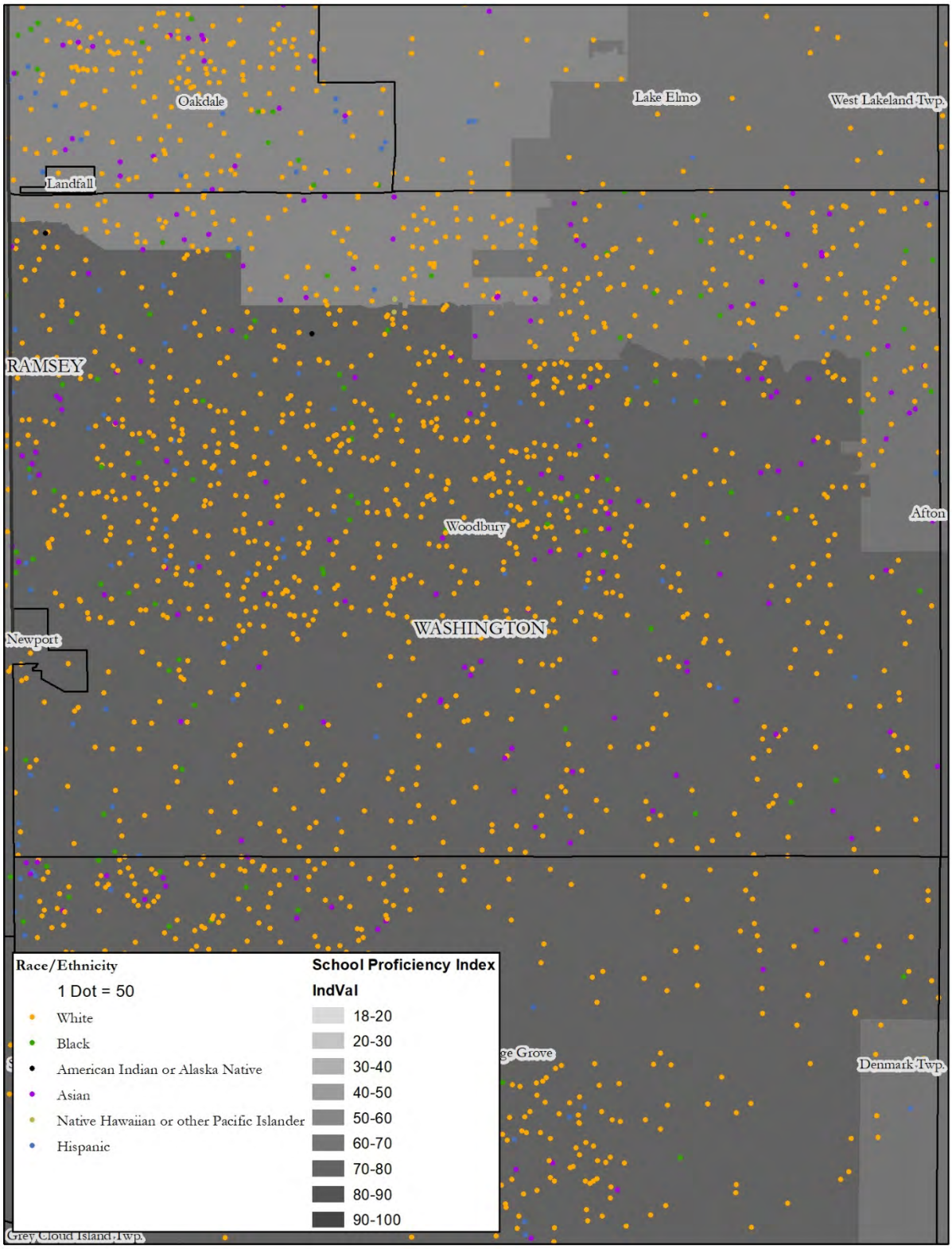
Map 23: Washington County, Race, School Proficiency



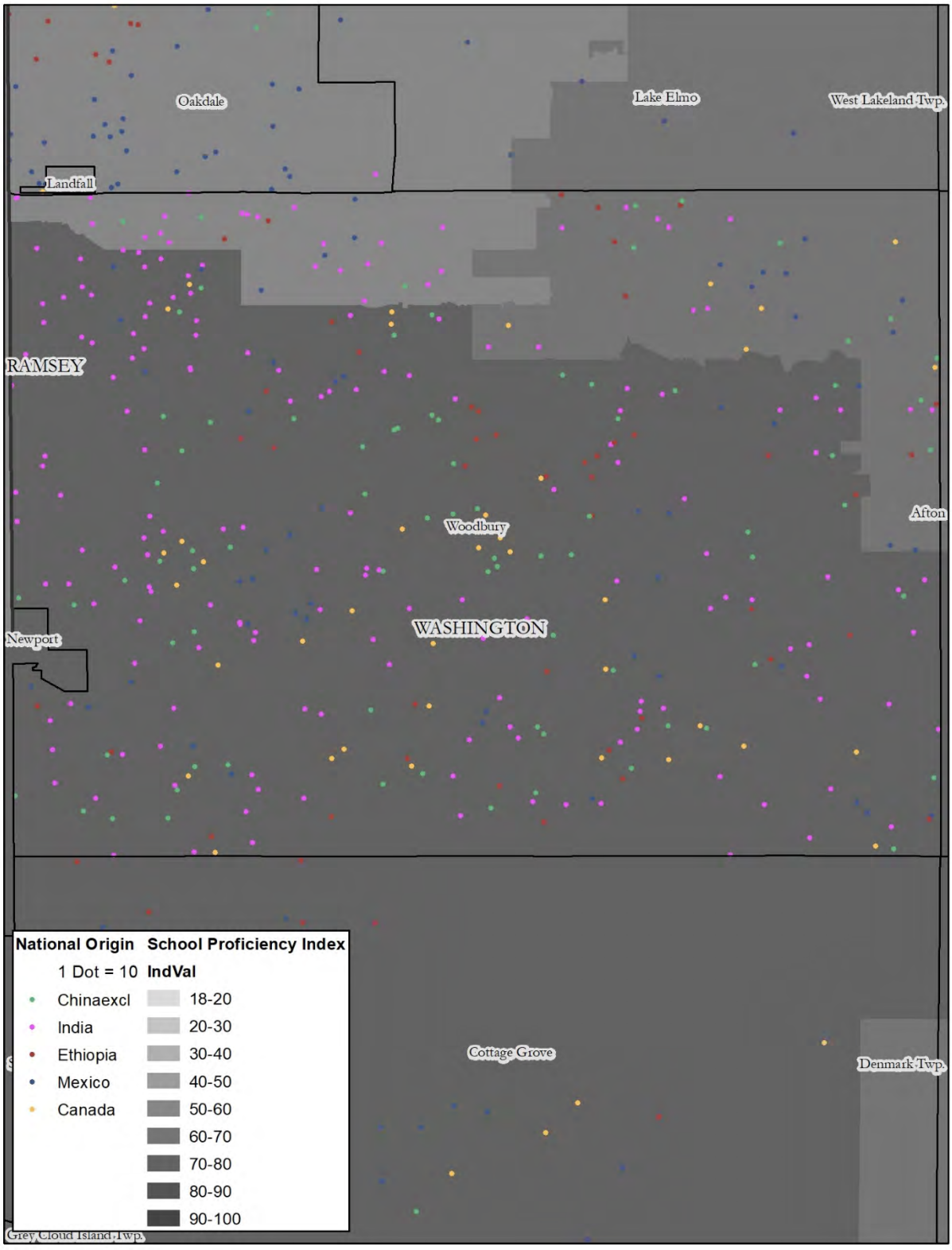
Map 24: Washington County, National Origin, School Proficiency



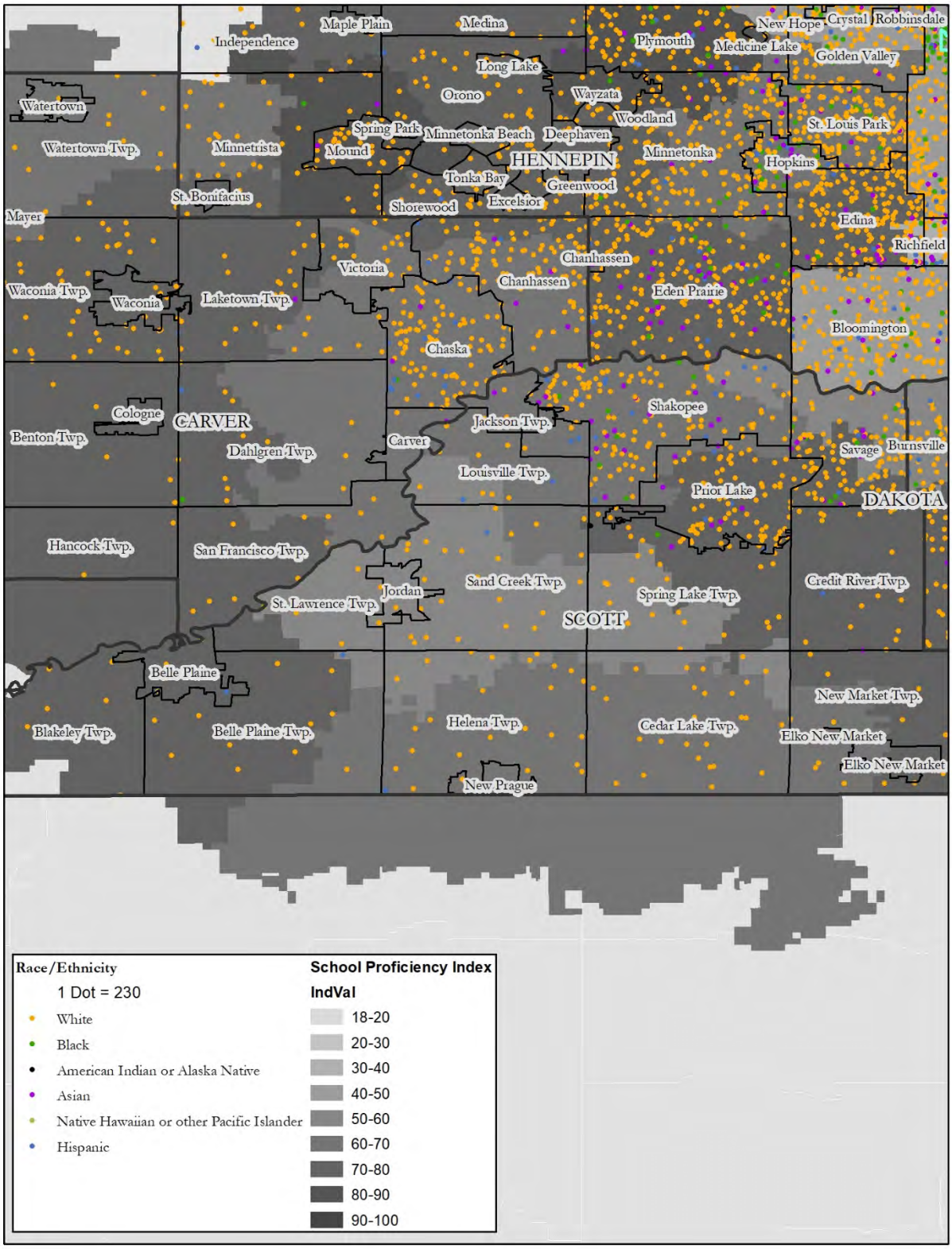
Map 25: Woodbury, Race, School Proficiency



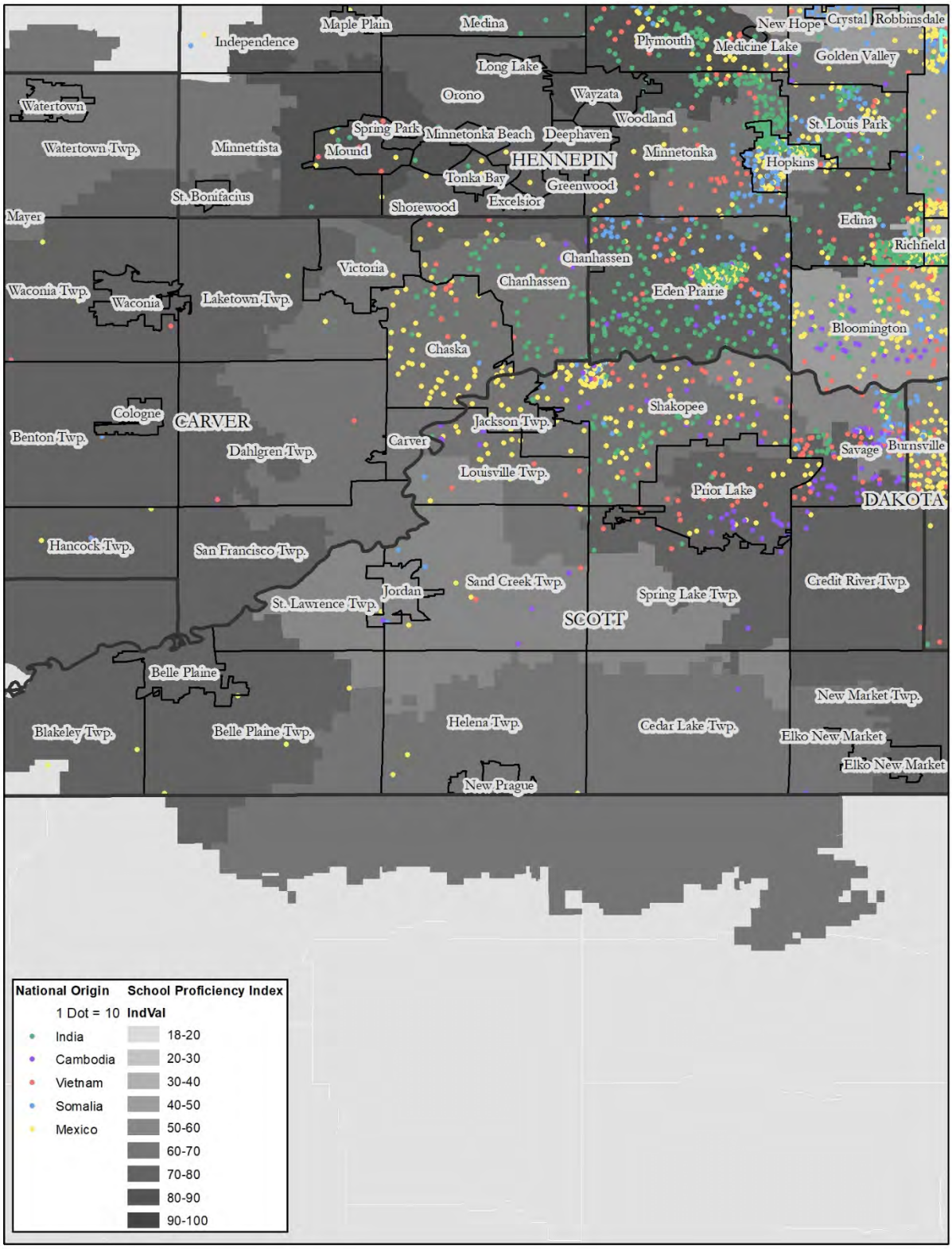
Map 26: Woodbury, National Origin, School Proficiency



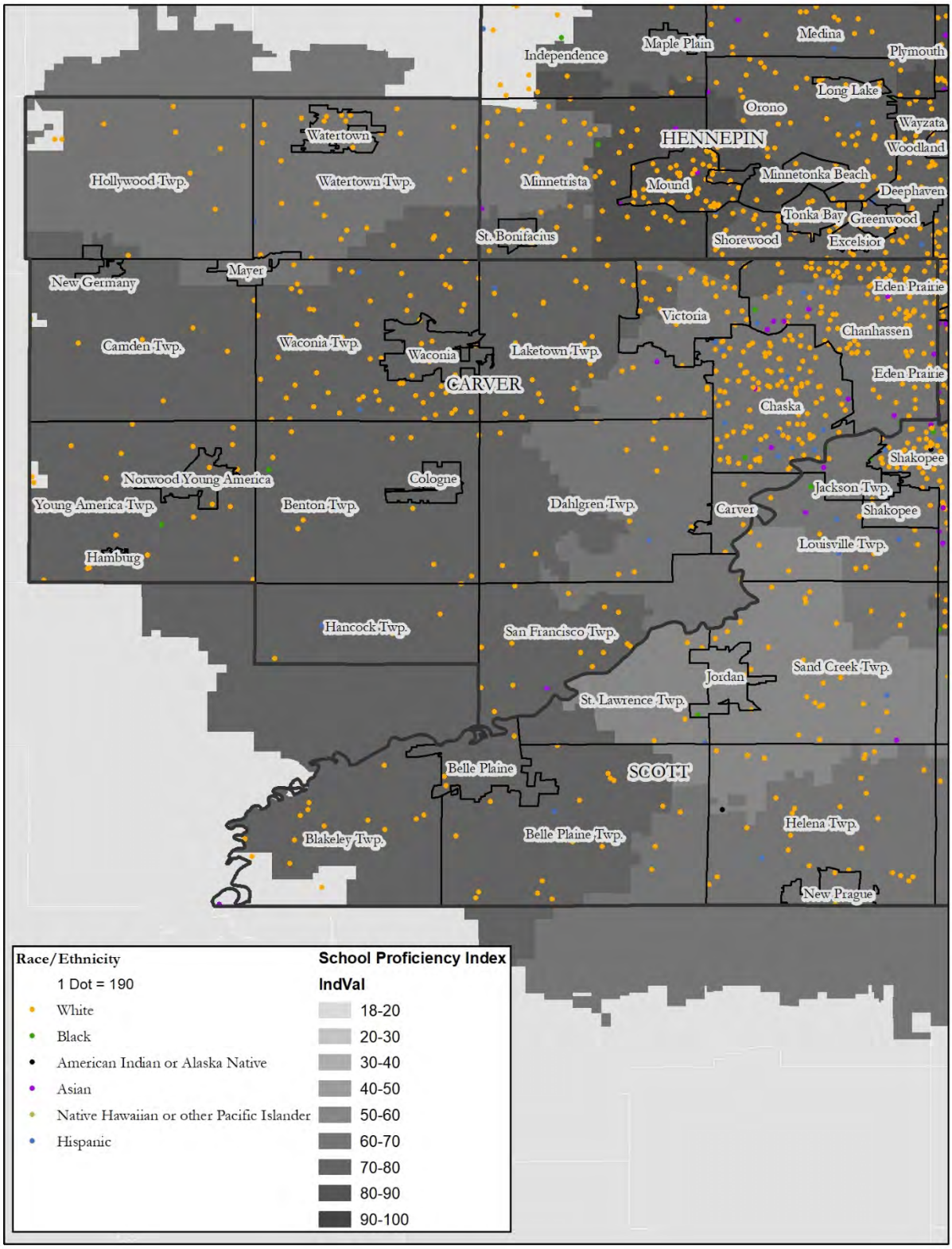
Map 27: Scott County, Race, School Proficiency



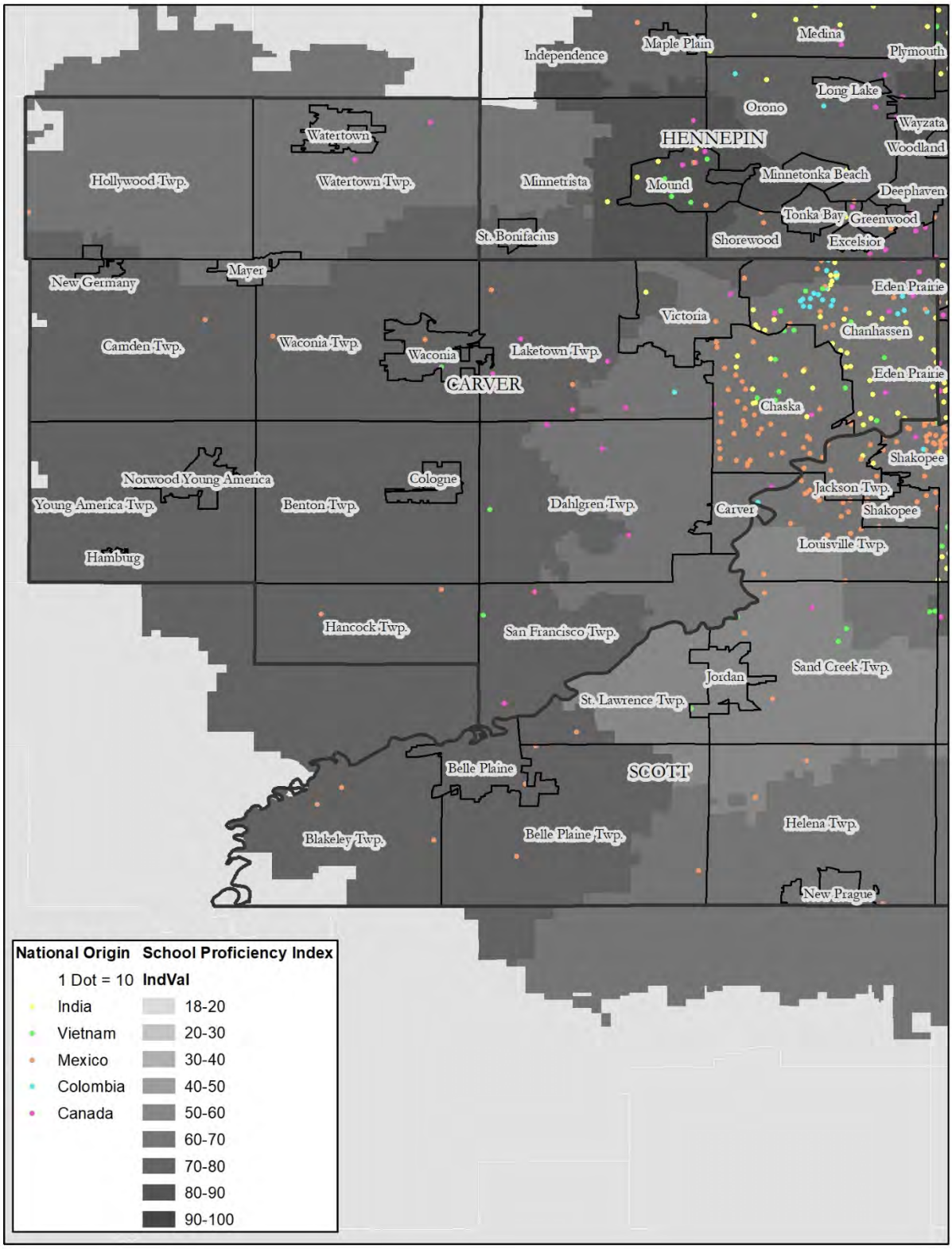
Map 28: Scott County, National Origin, School Proficiency



Map 29: Carver County, Race, School Proficiency

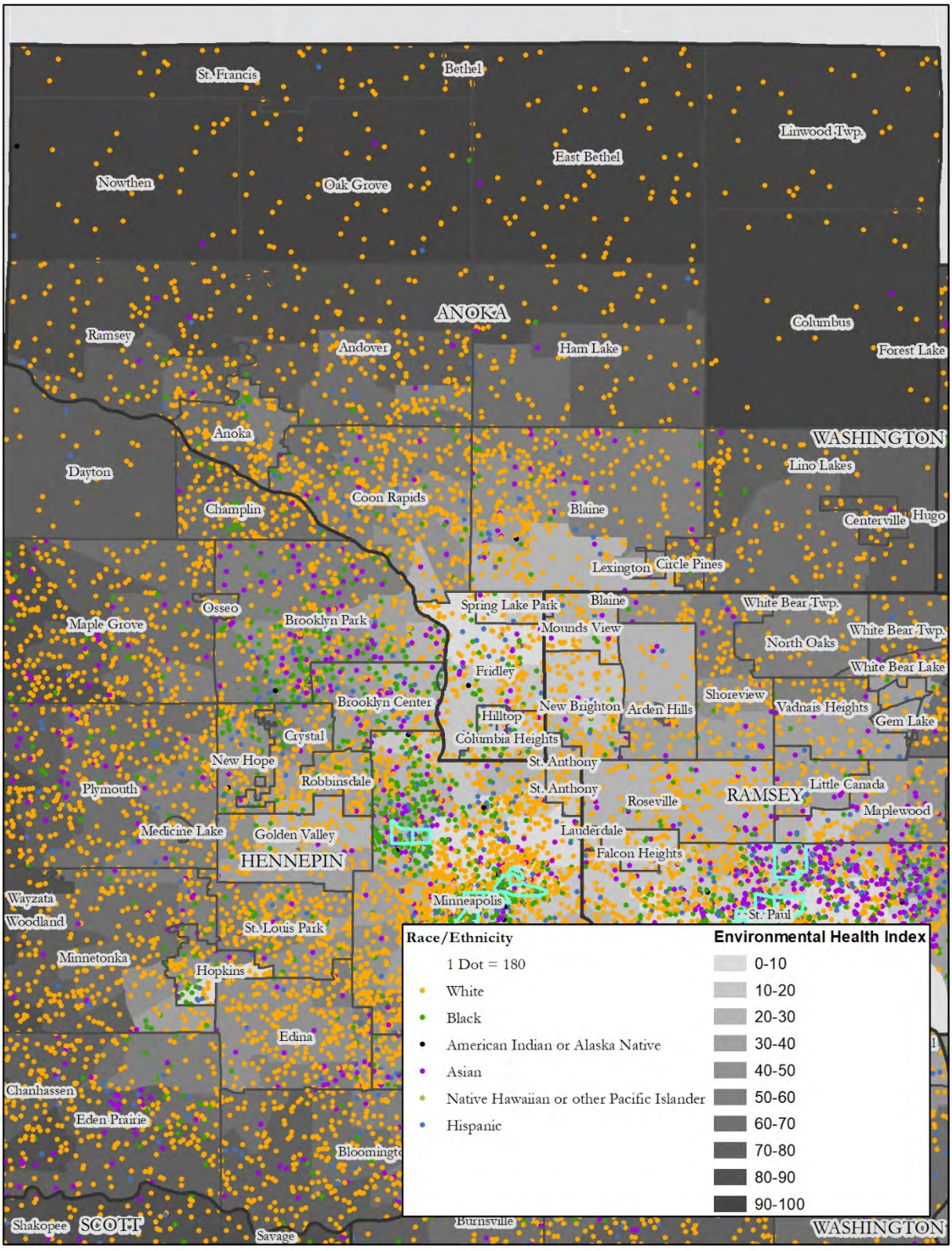


Map 30: Carver County, National Origin, School Proficiency

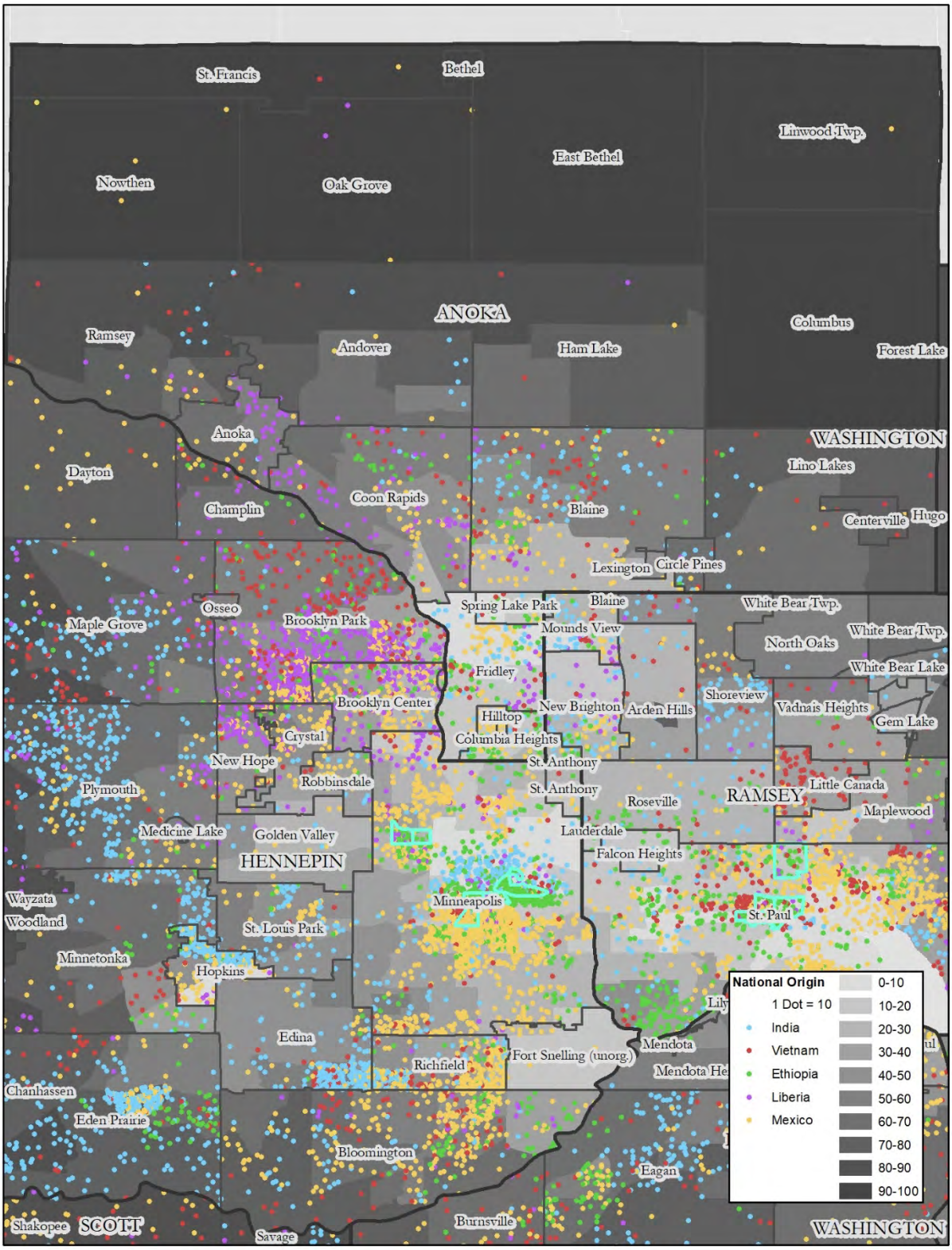


Environmental Index Maps

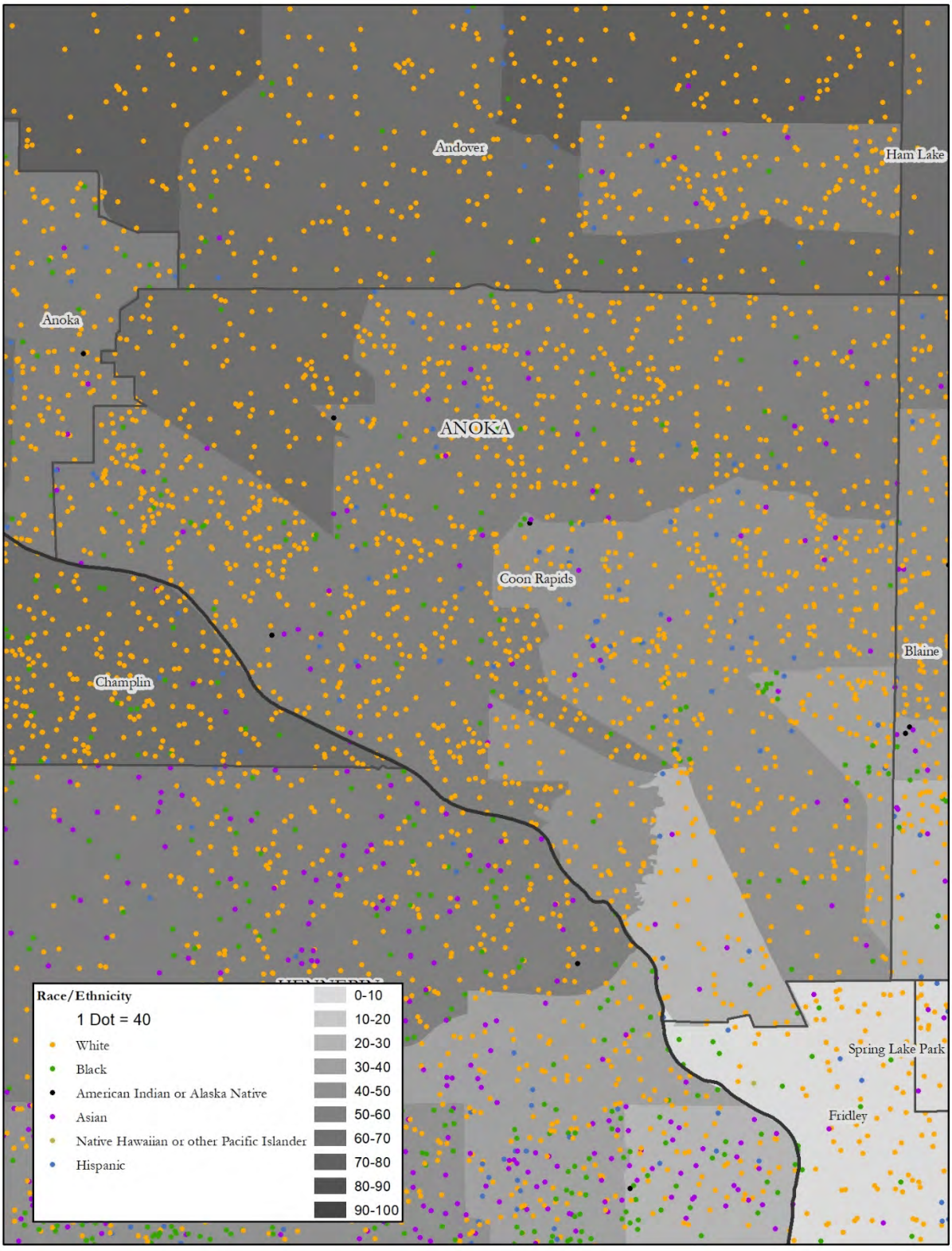
Map 1: Anoka County, Race, Environmental Health



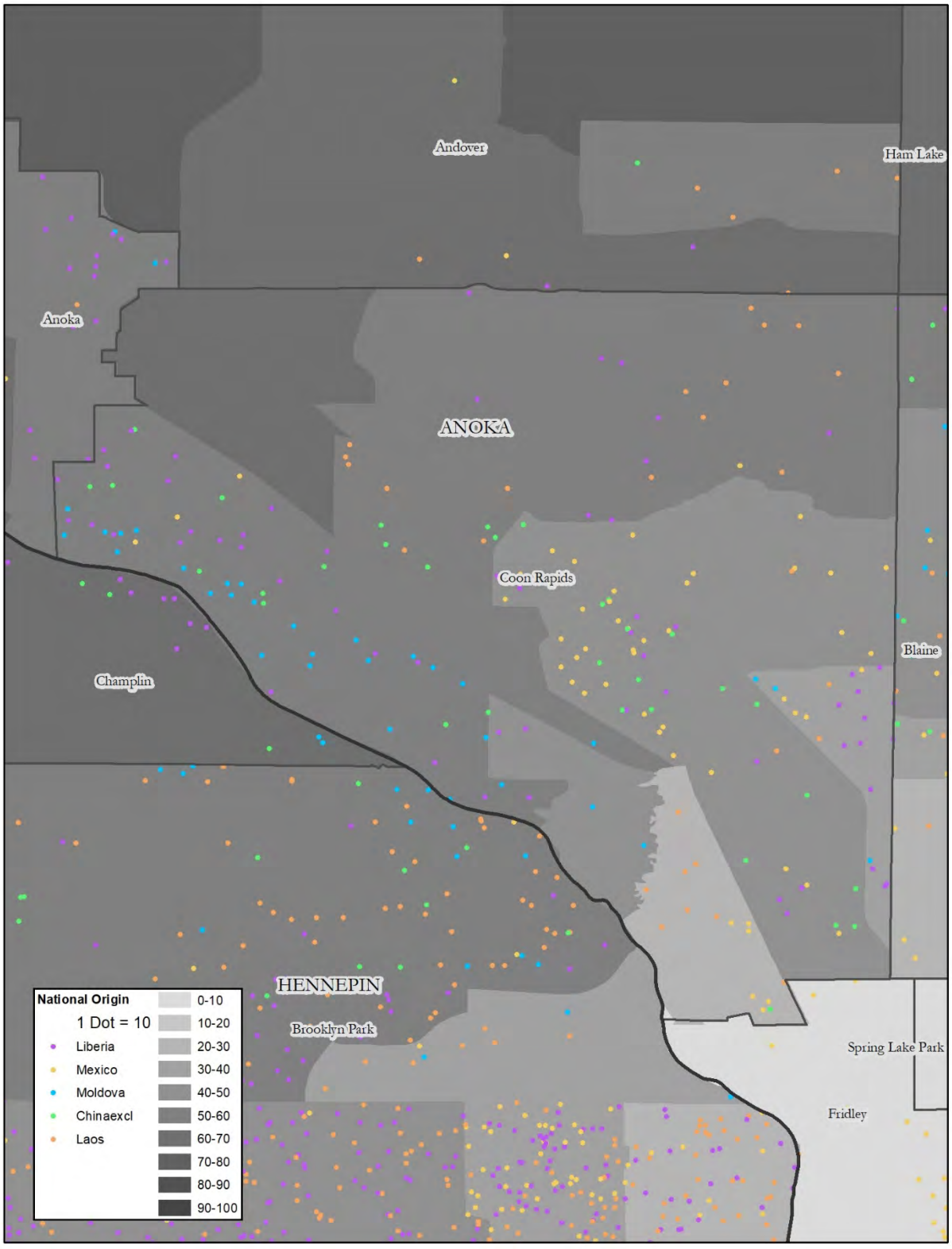
Map 2: Anoka County, National Origin, Environmental Health



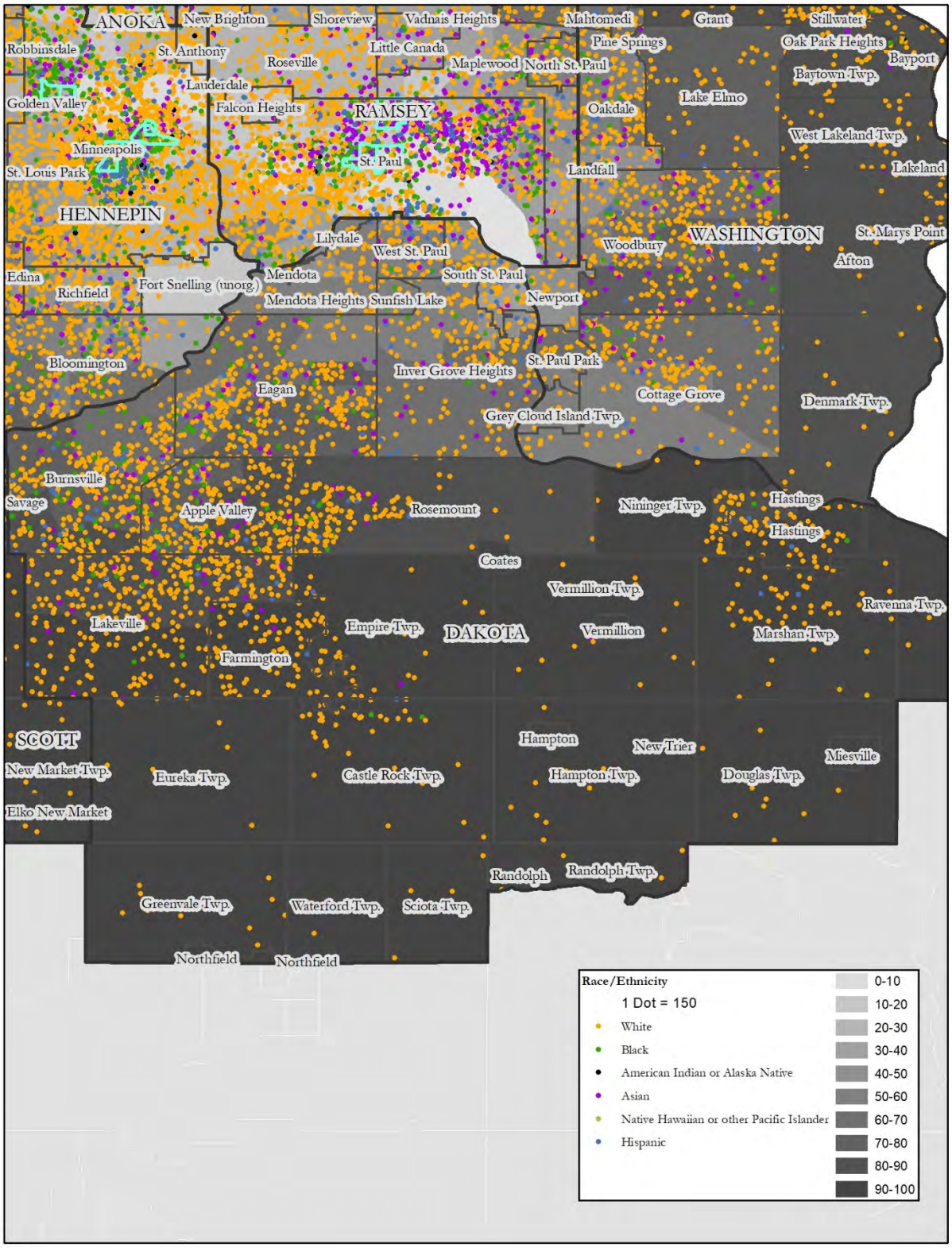
Map 3: Coon Rapids, Race, Environmental Health



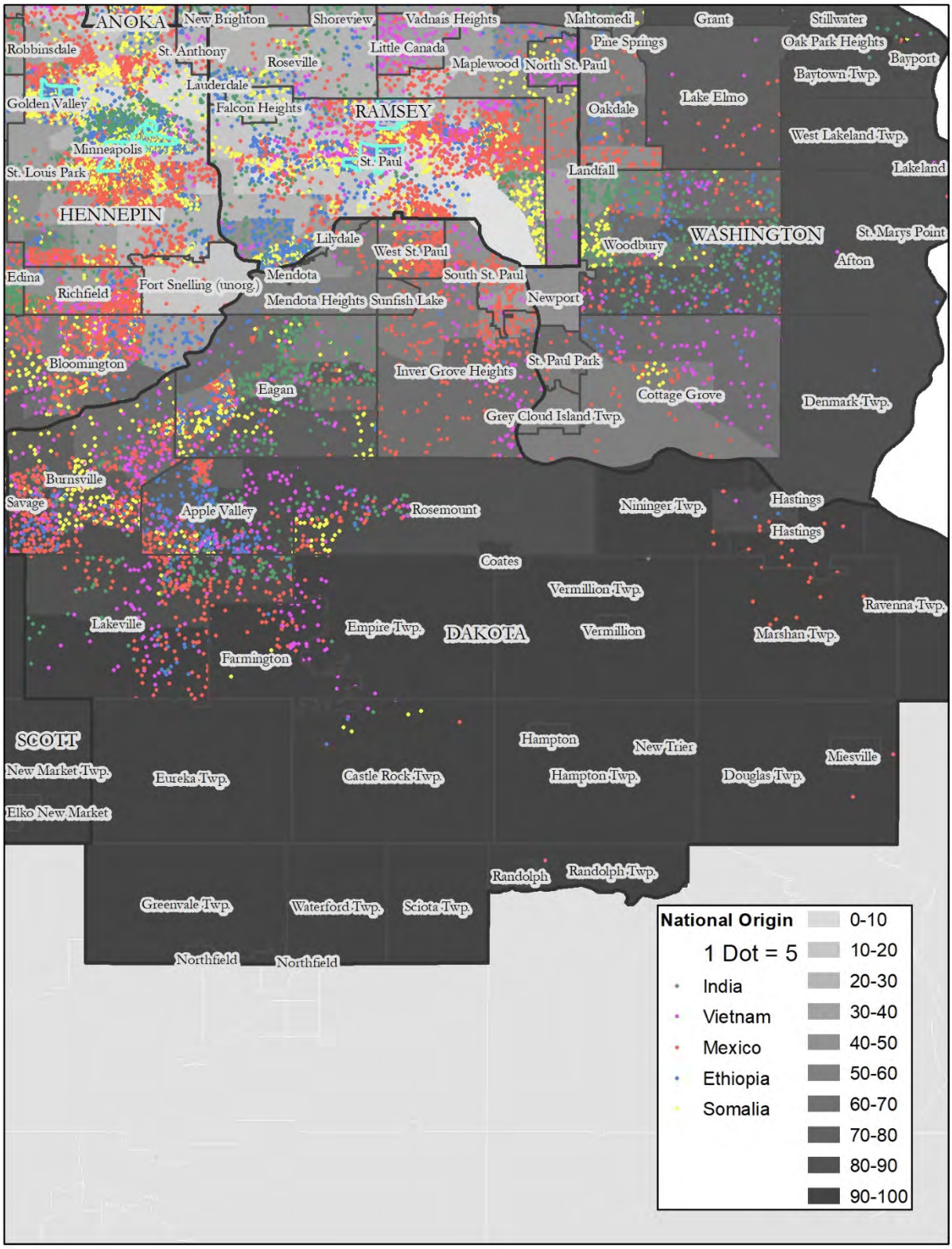
Map 4: Coon Rapids, National Origin, Environmental Health



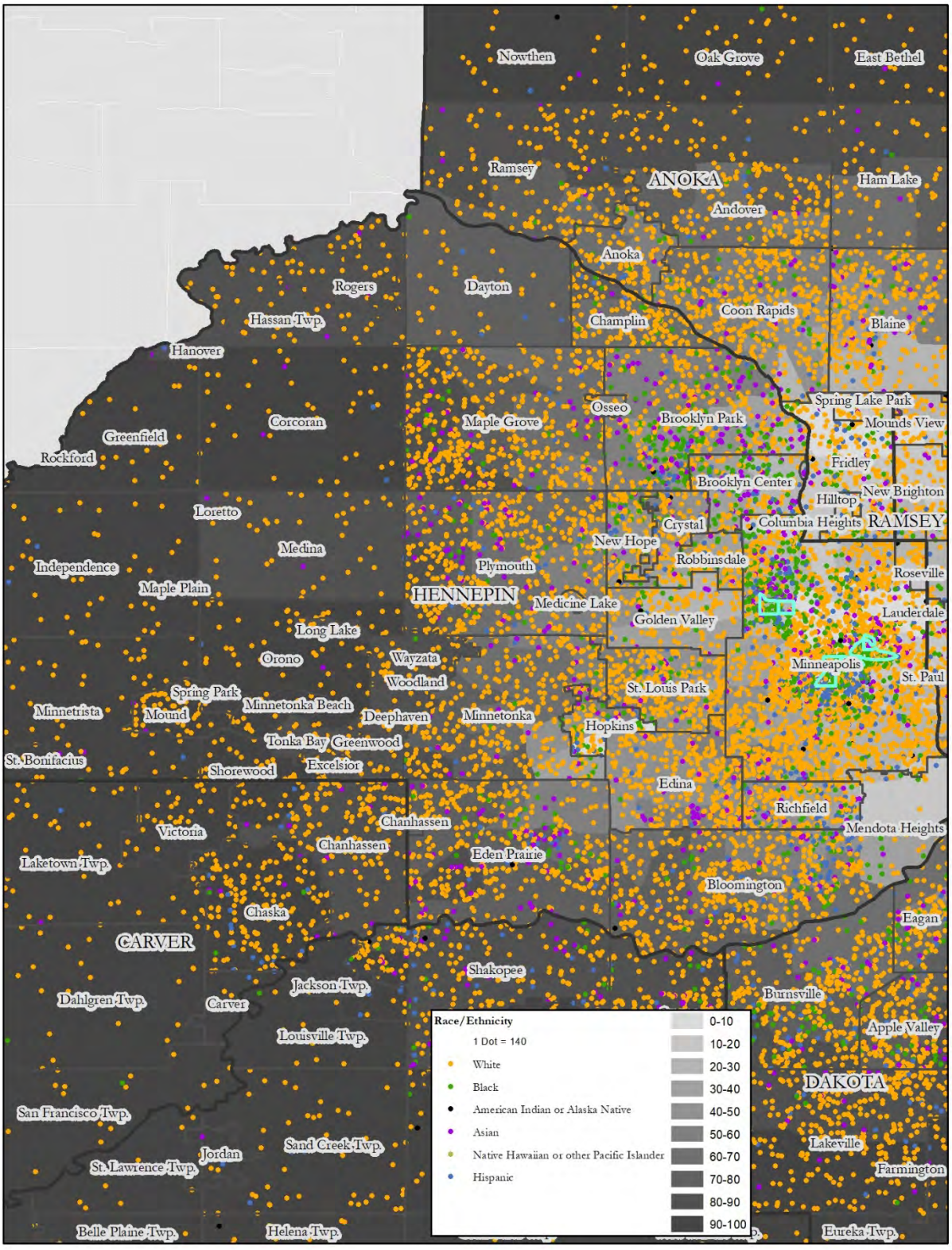
Map 5: Dakota County, Race, Environmental Health



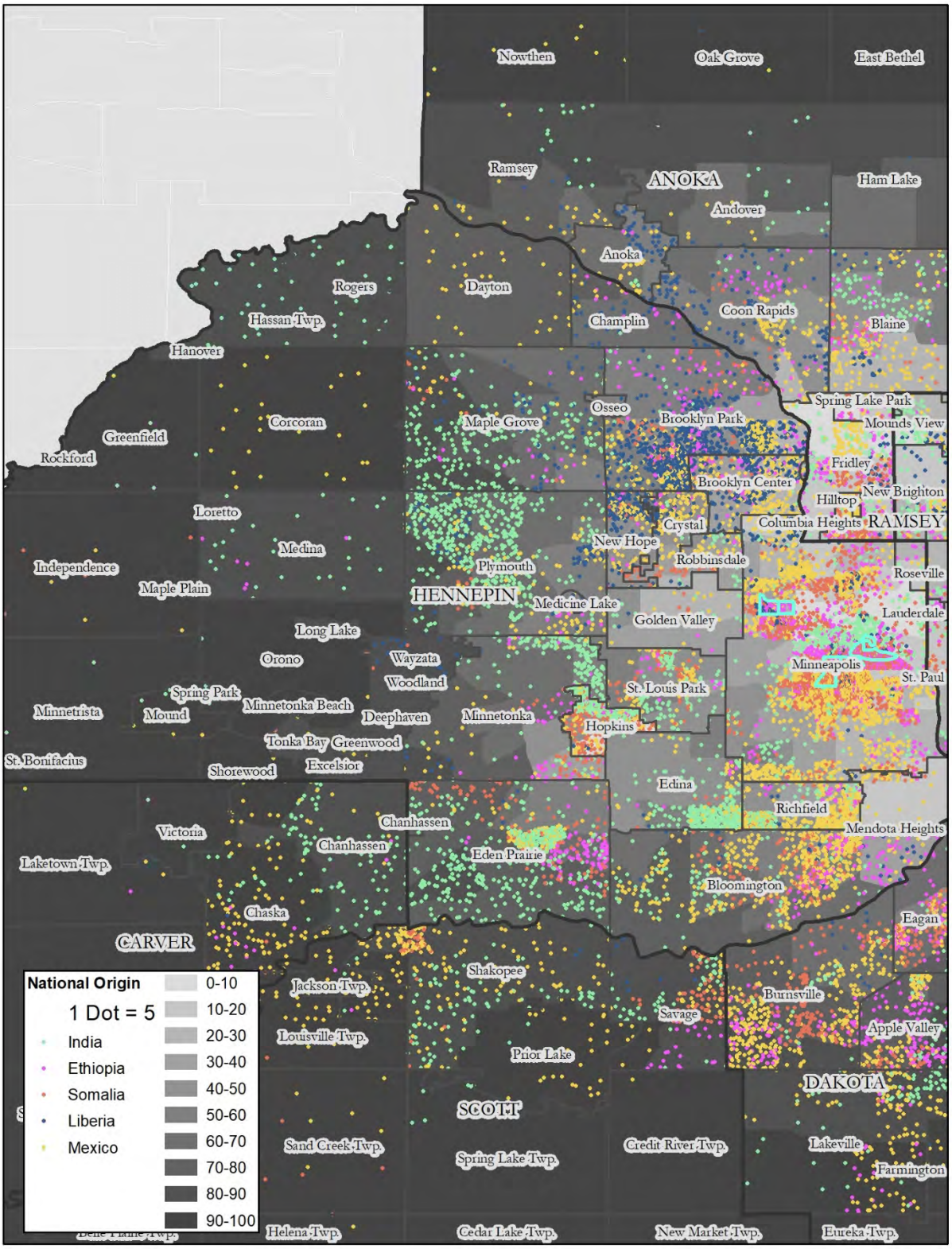
Map 6: Dakota County, National Origin, Environmental Health



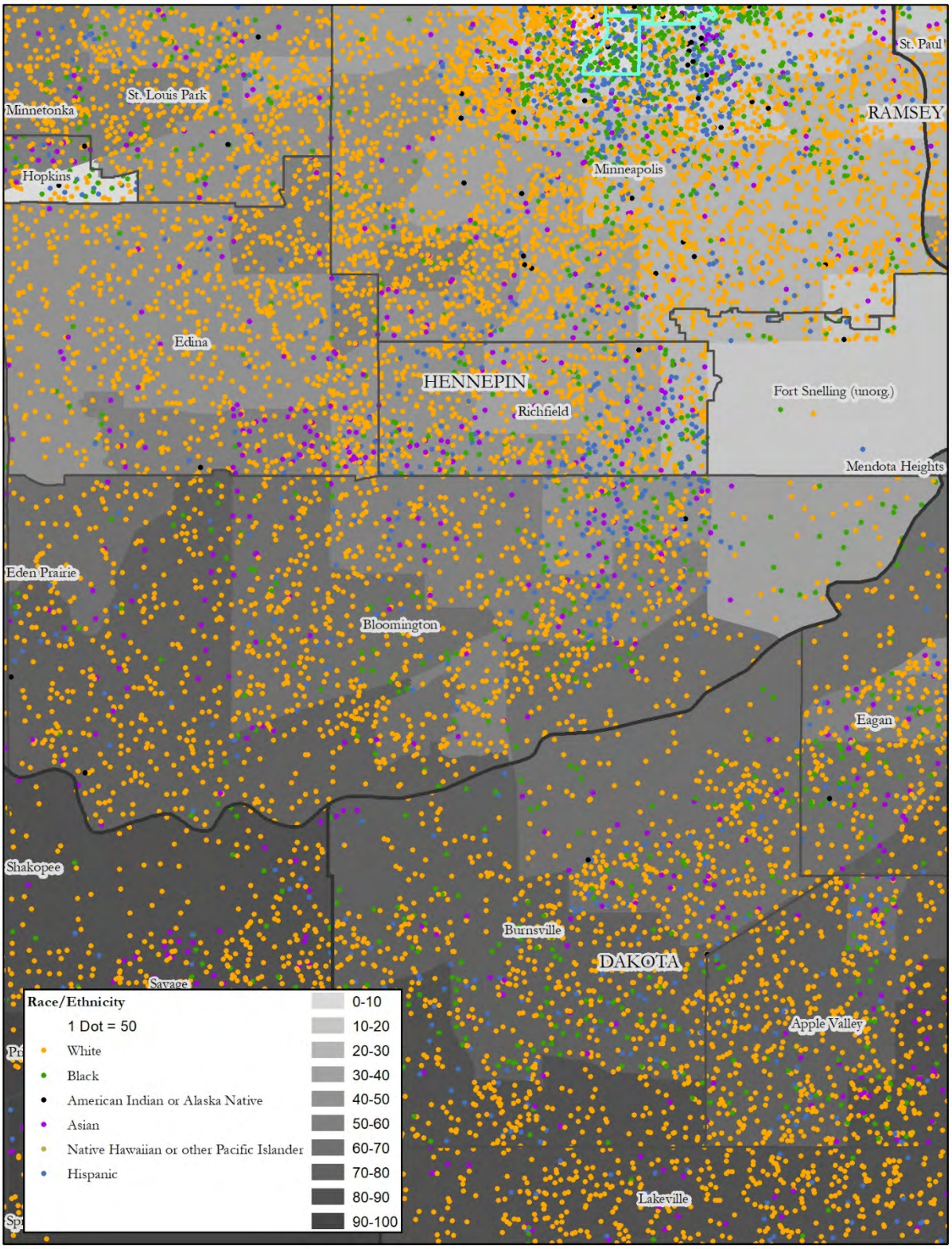
Map 7: Hennepin County, Race, Environmental Health



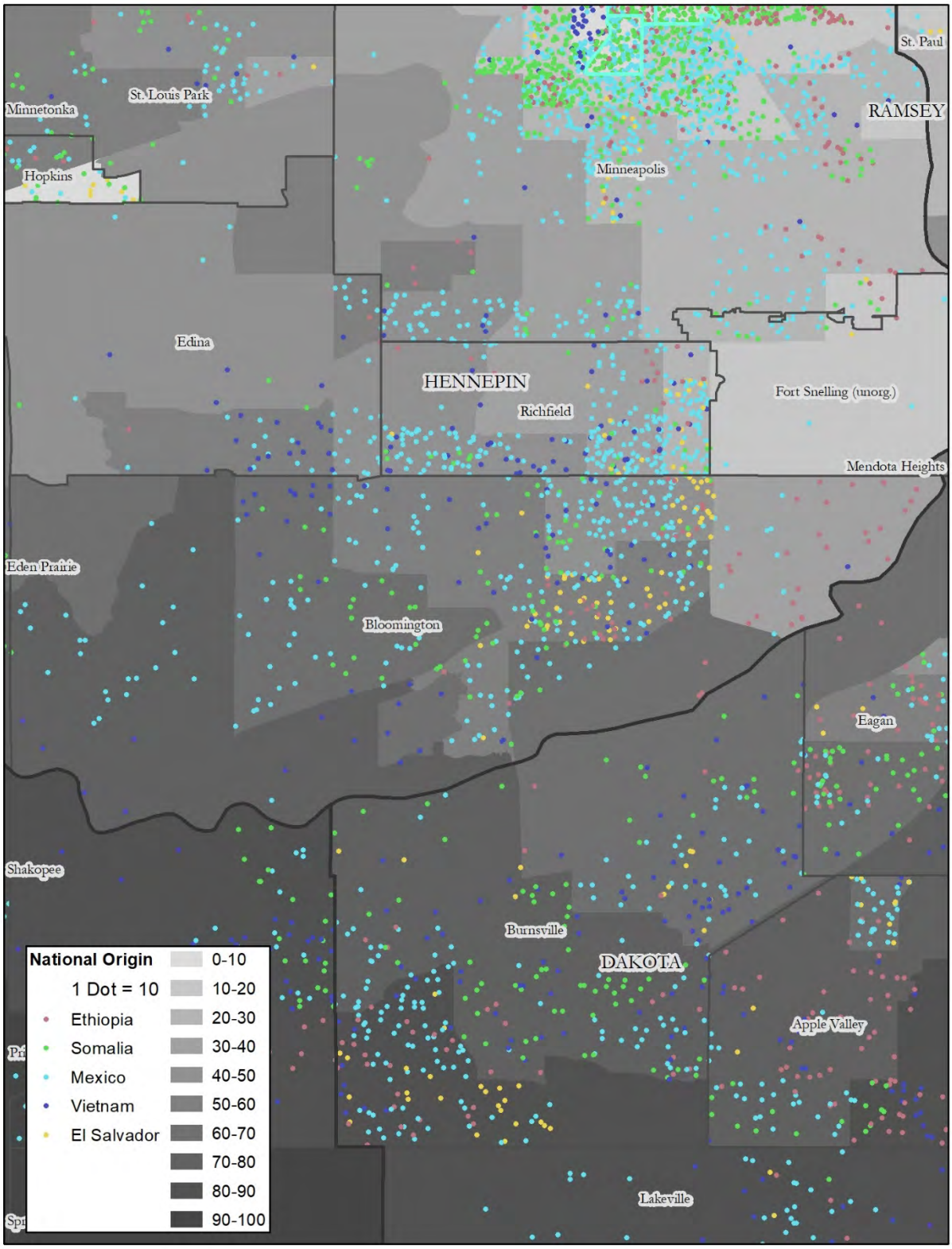
Map 8: Hennepin County, National Origin, Environmental Health



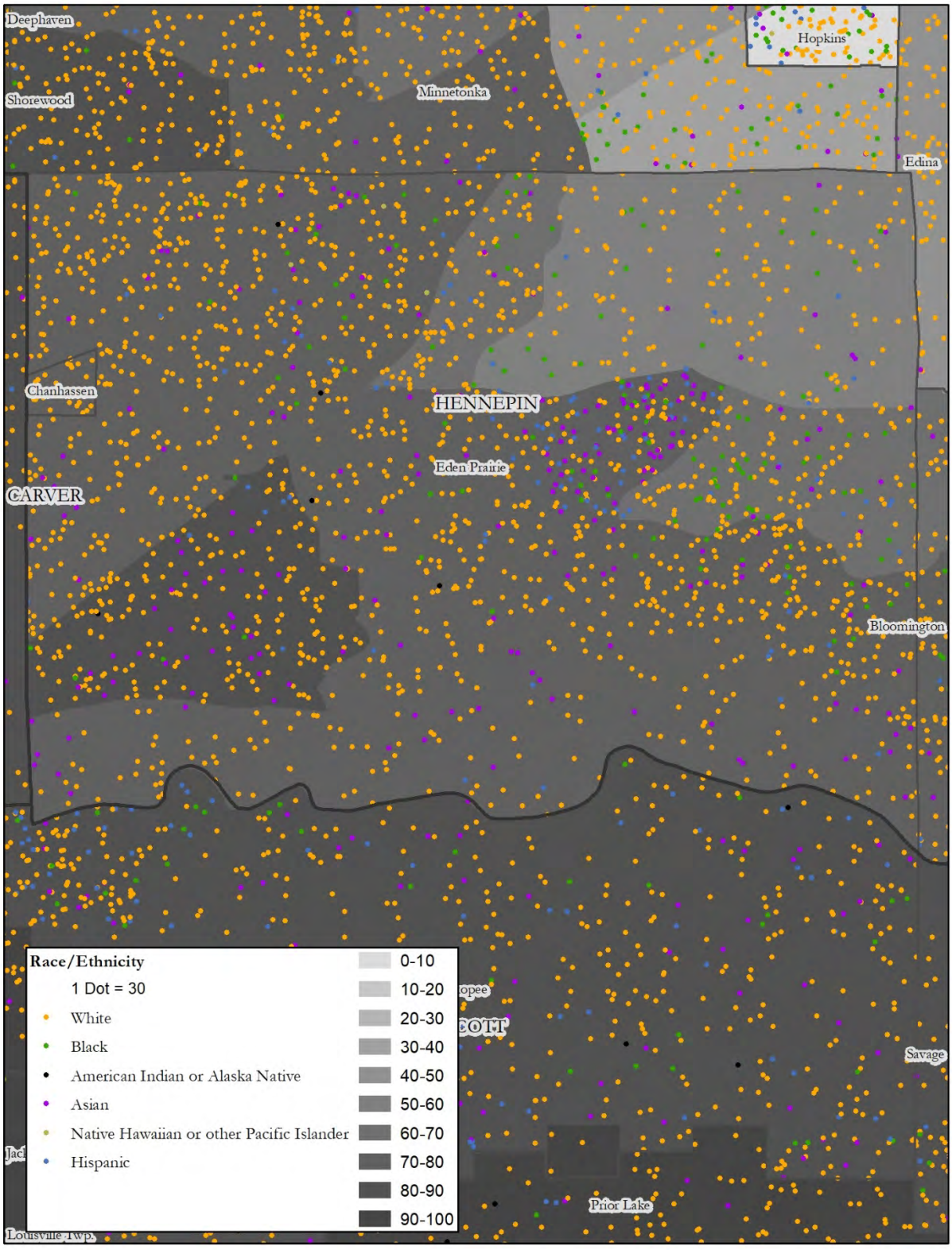
Map 9: Bloomington, Race, Environmental Health



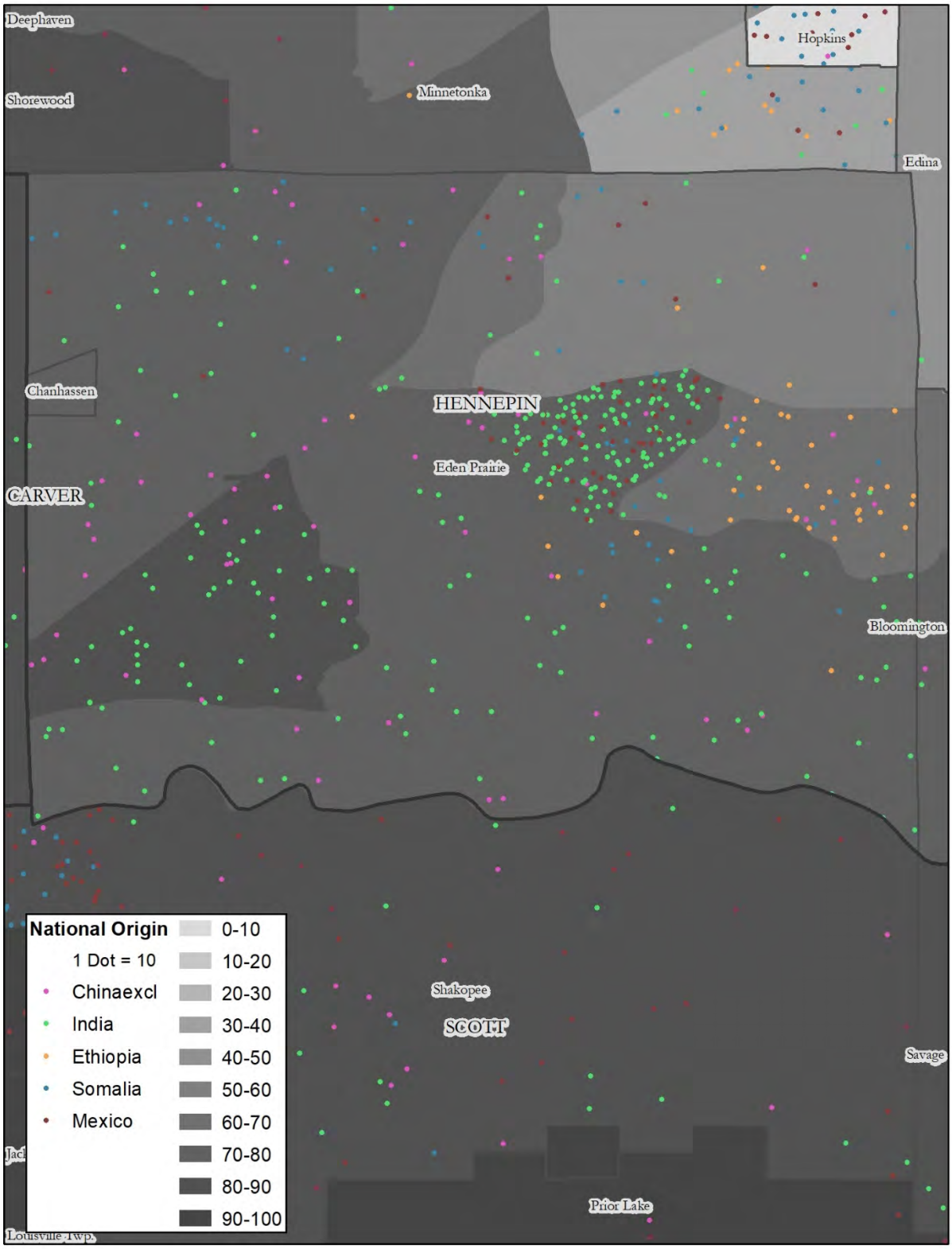
Map 10: Bloomington, National Origin, Environmental Health



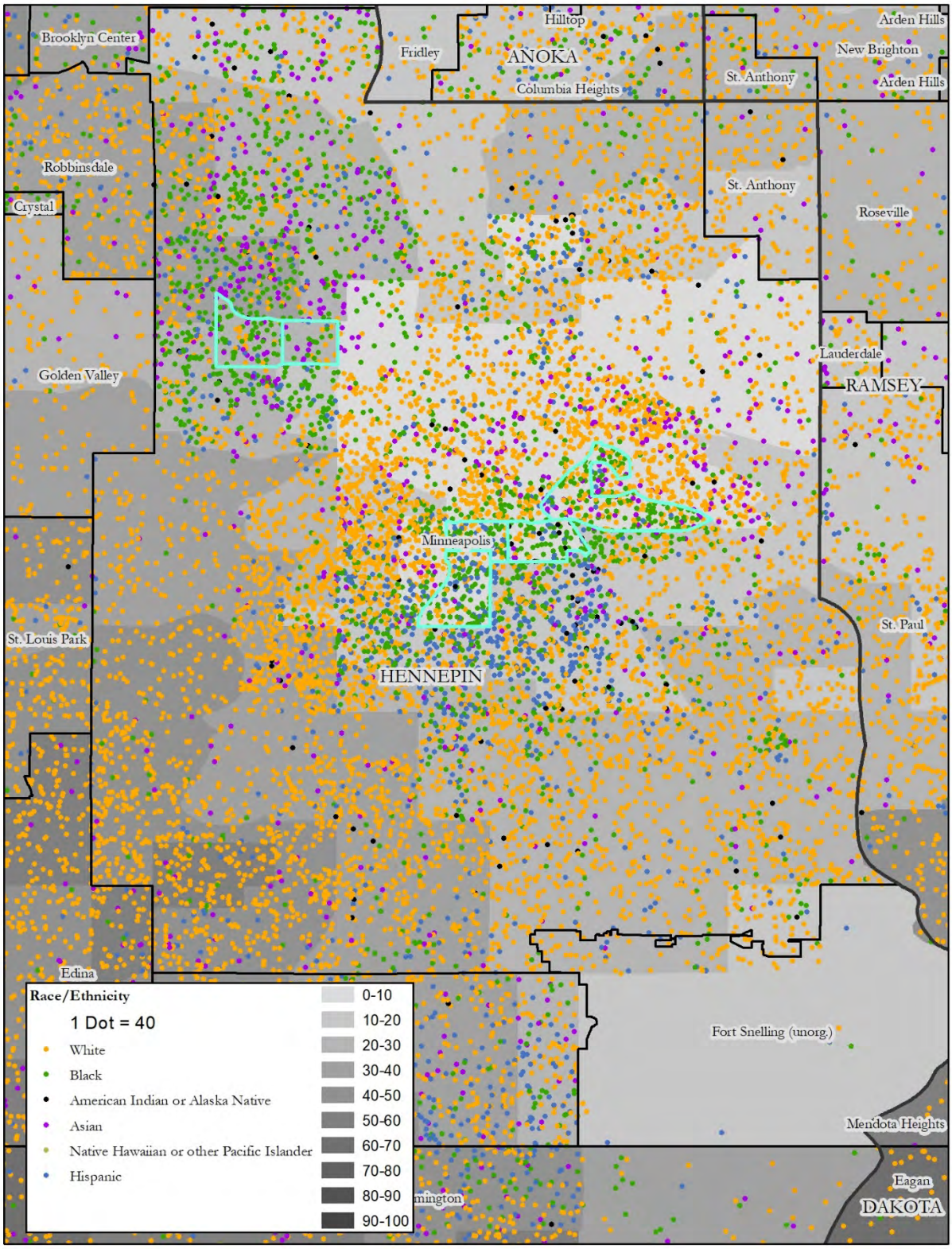
Map 11: Eden Prairie, Race, Environmental Health



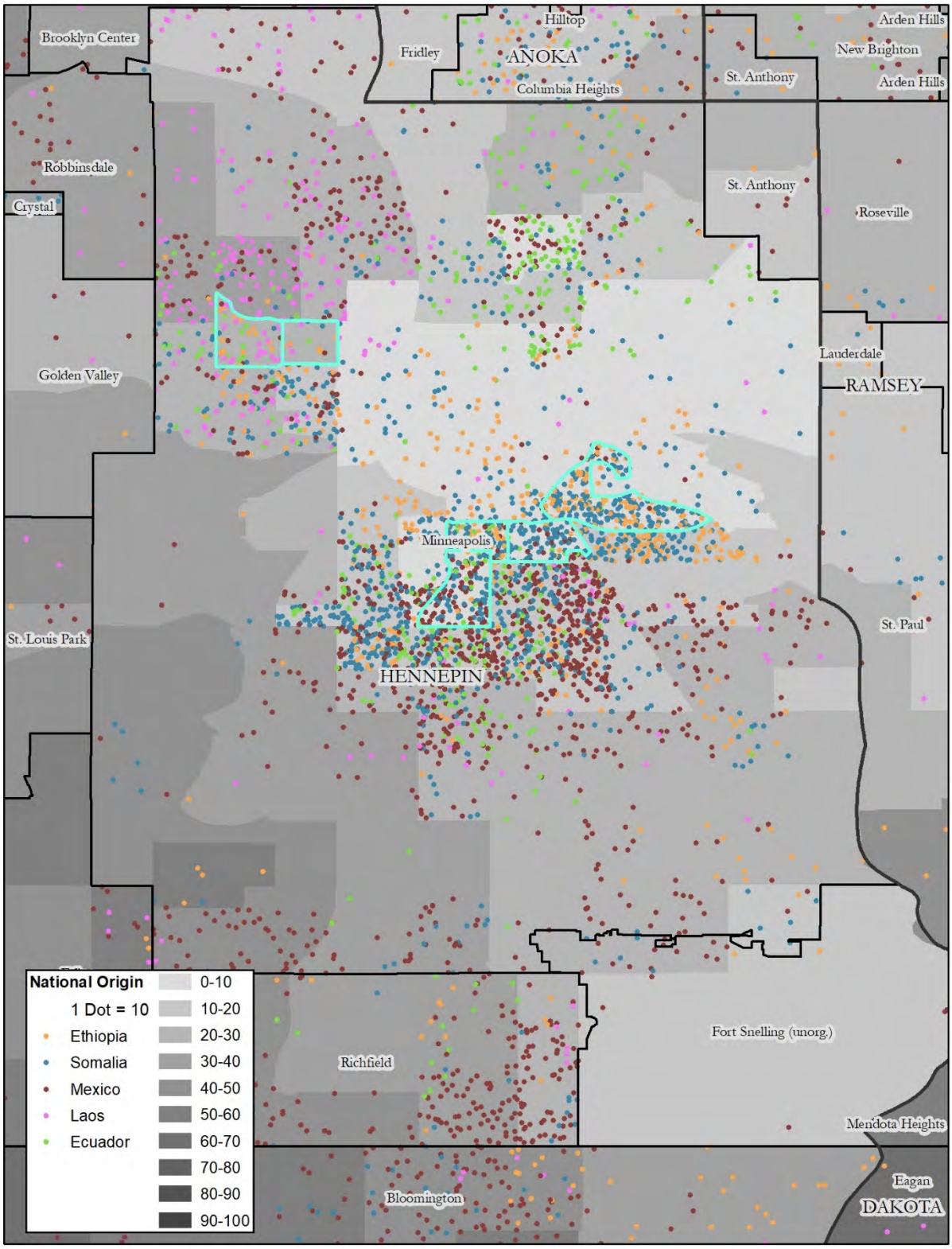
Map 12: Eden Prairie, National Origin, Environmental Health



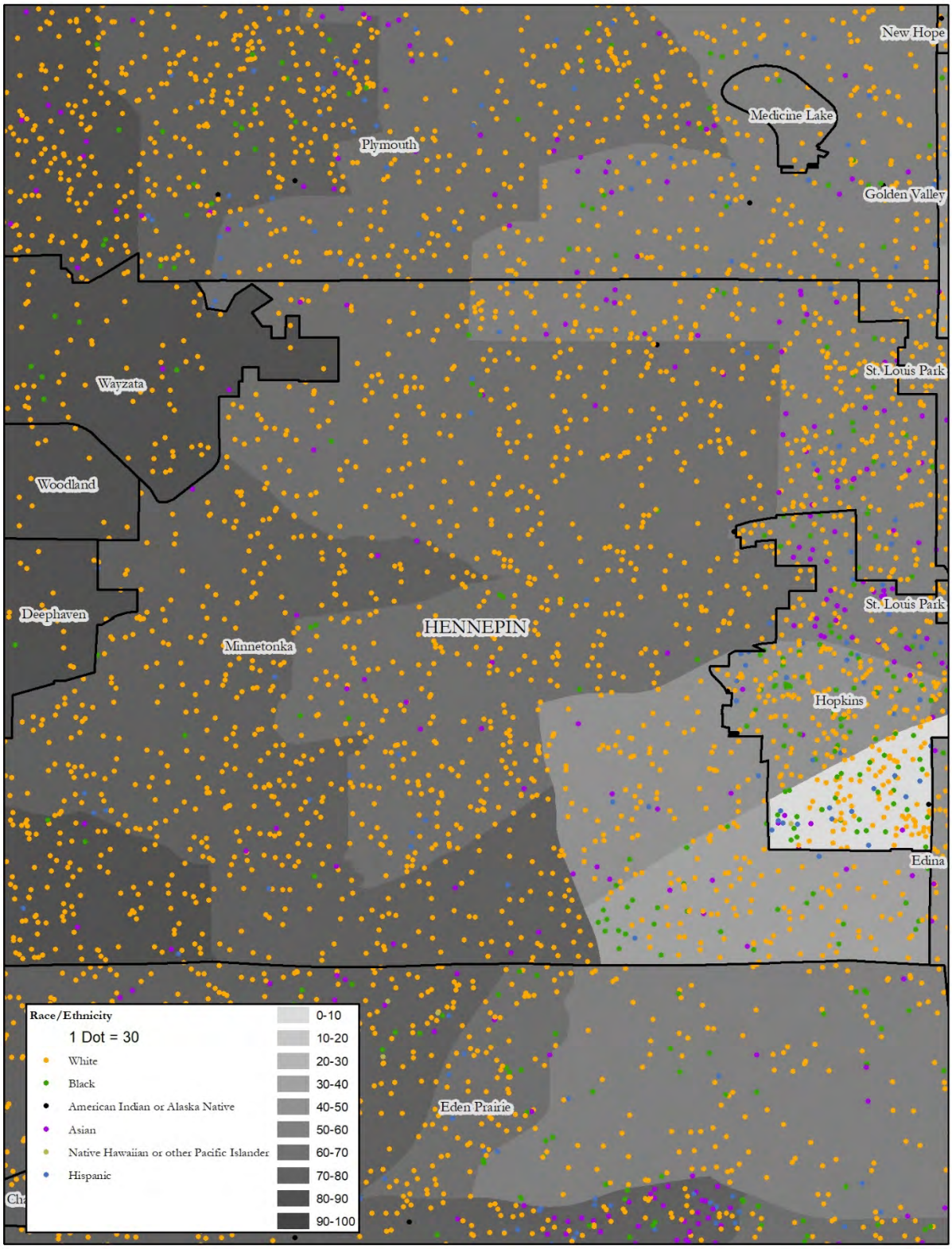
Map 13: Minneapolis, Race, Environmental Health



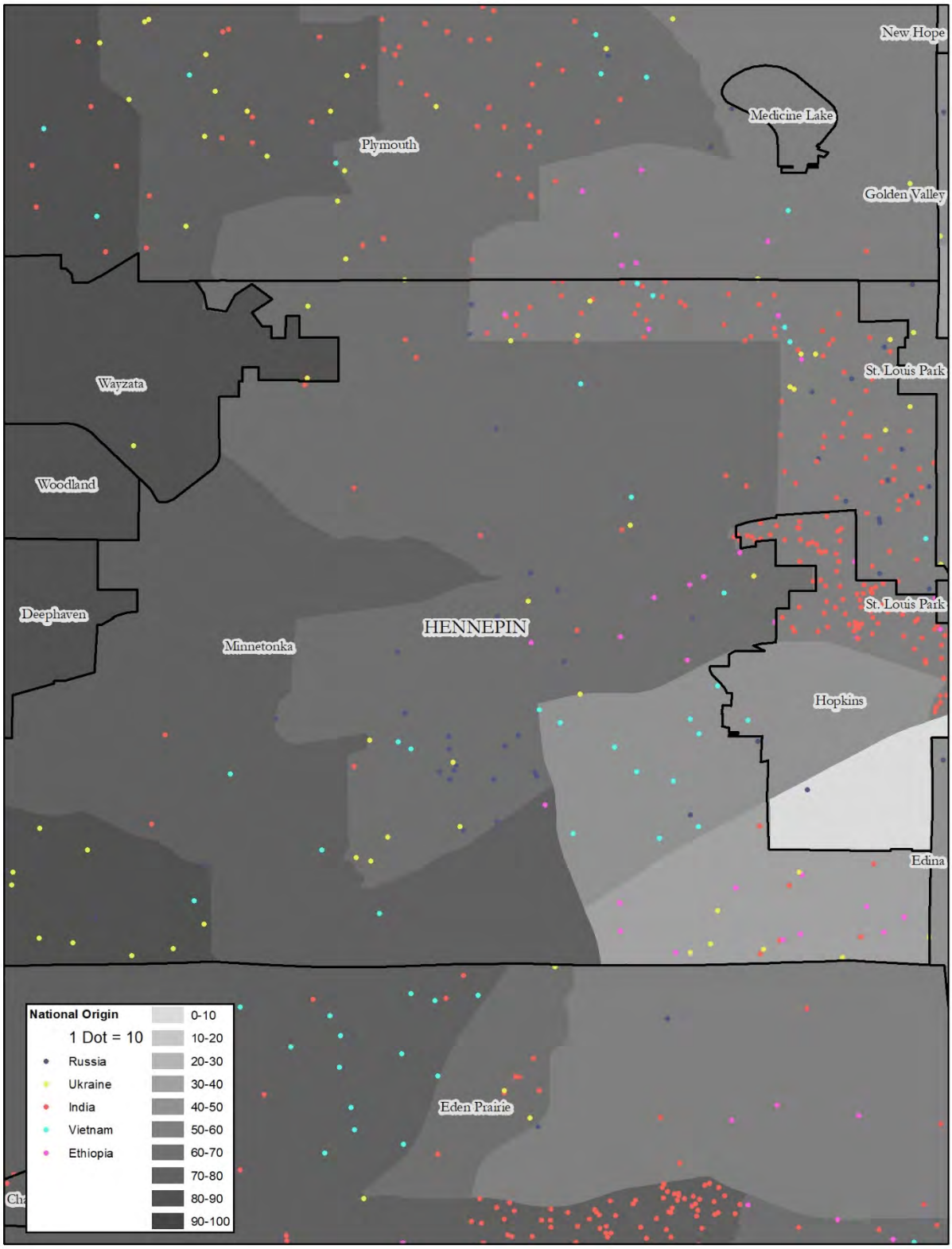
Map 14: Minneapolis, National Origin, Environmental Health



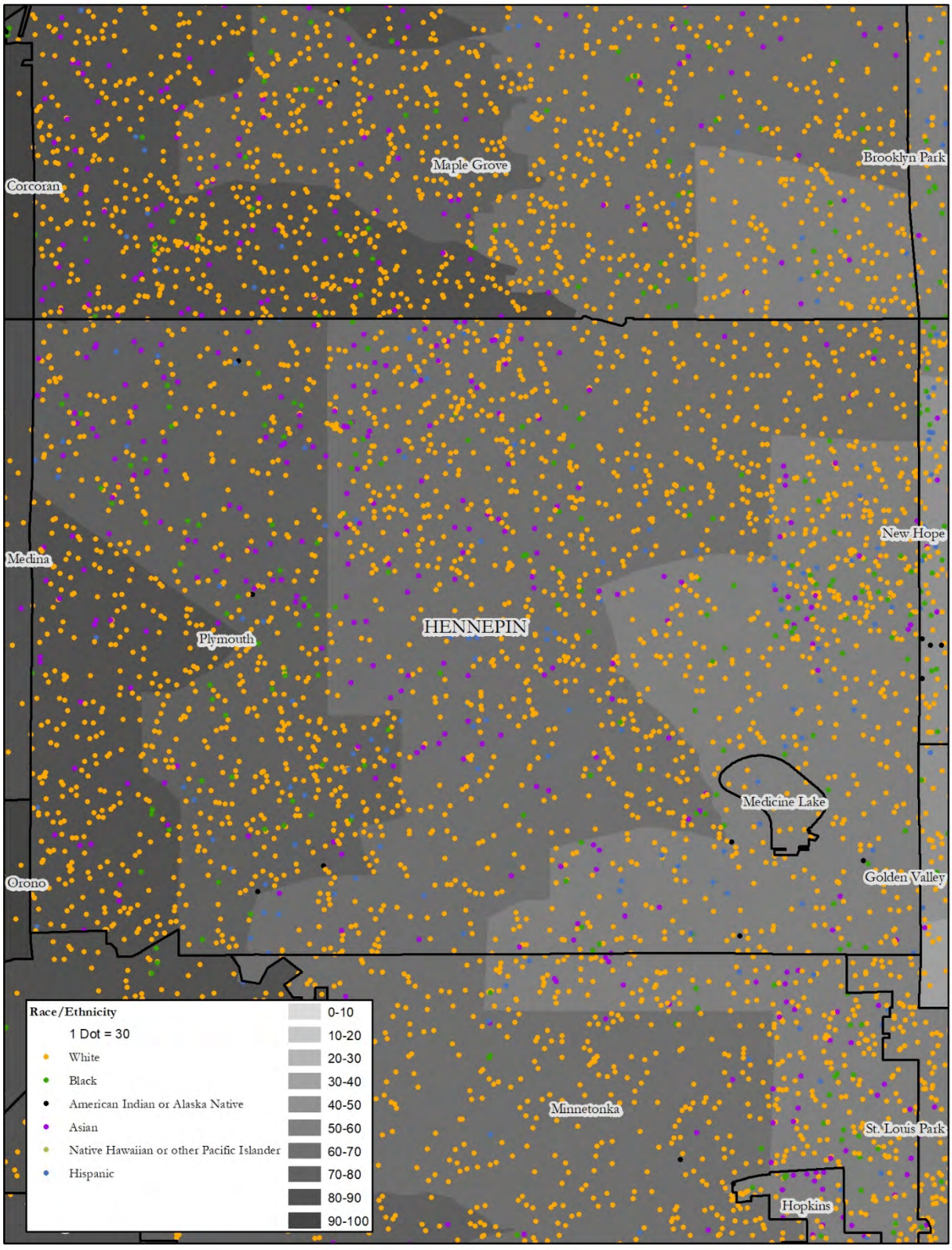
Map 15: Minnetonka, Race, Environmental Health



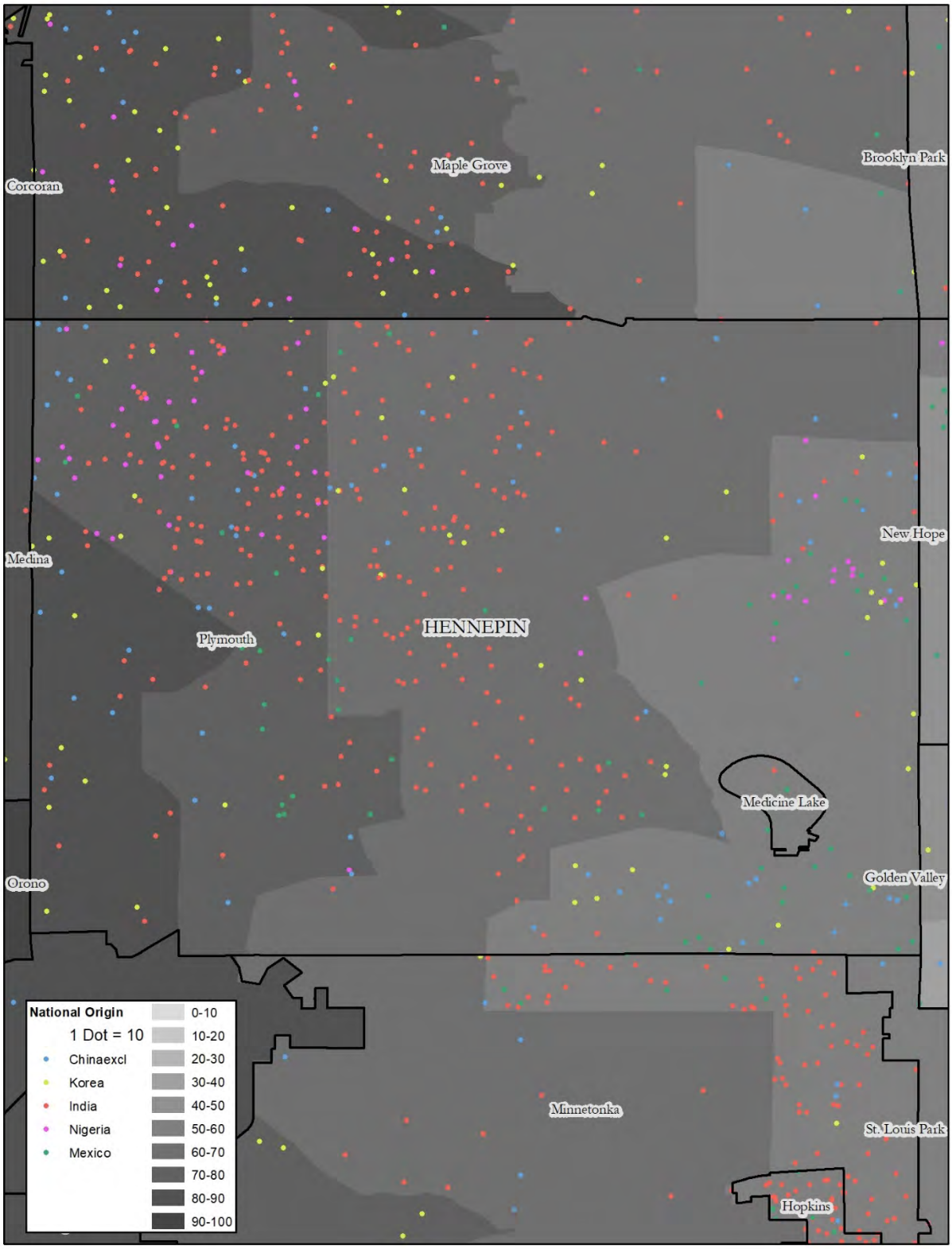
Map 16: Minnetonka, National Origin, Environmental Health



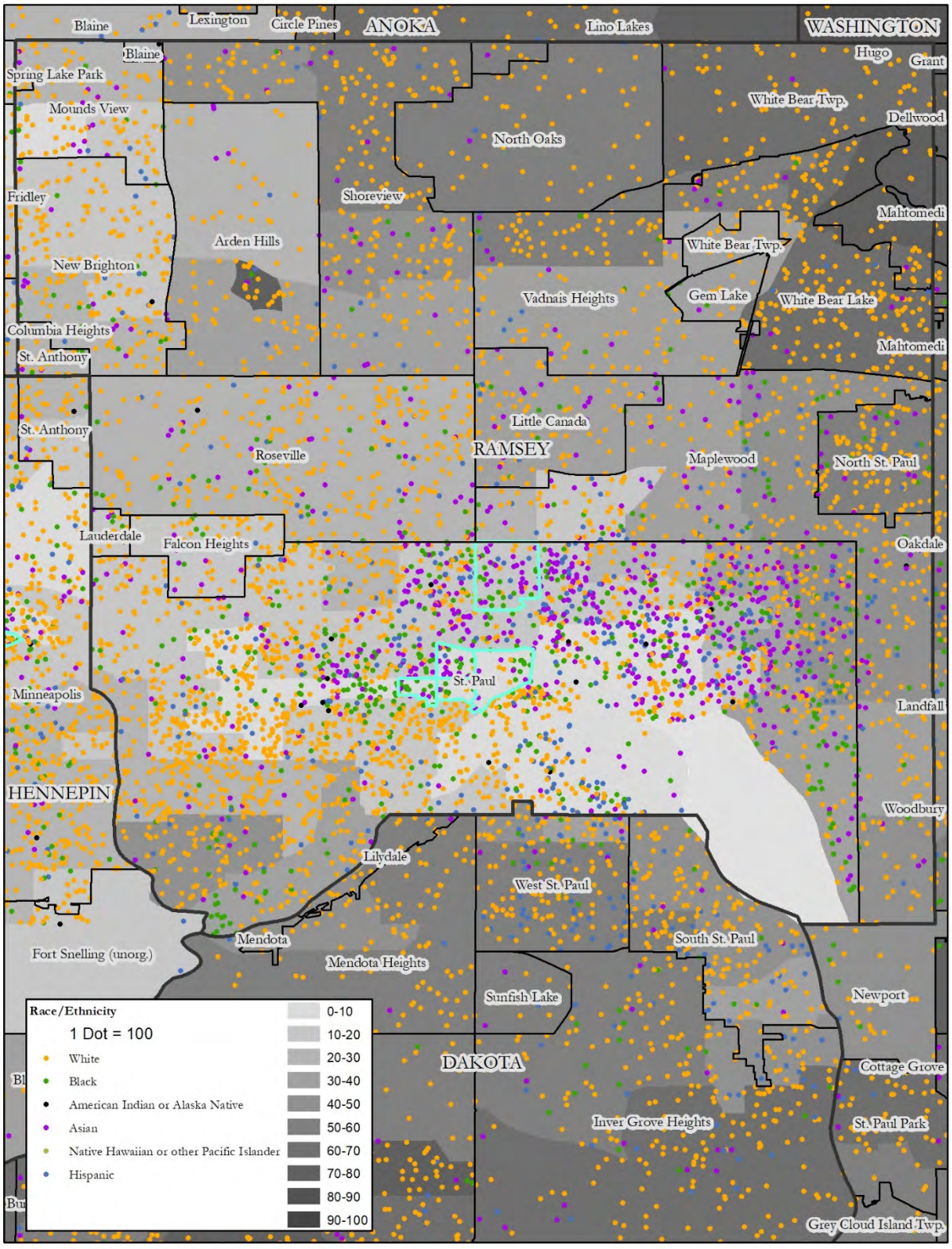
Map 17: Plymouth, Race, Environmental Health



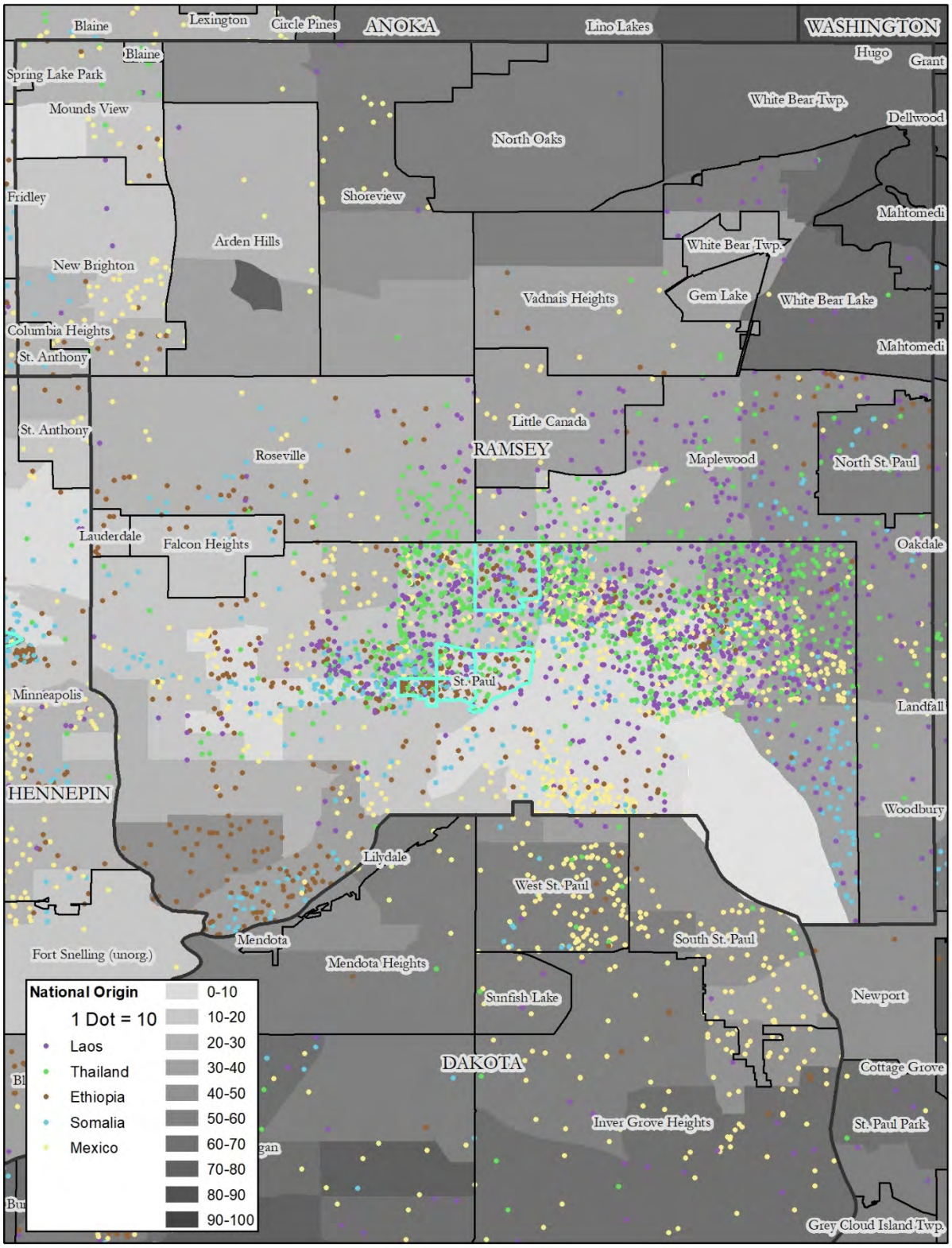
Map 18: Plymouth, National Origin, Environmental Health



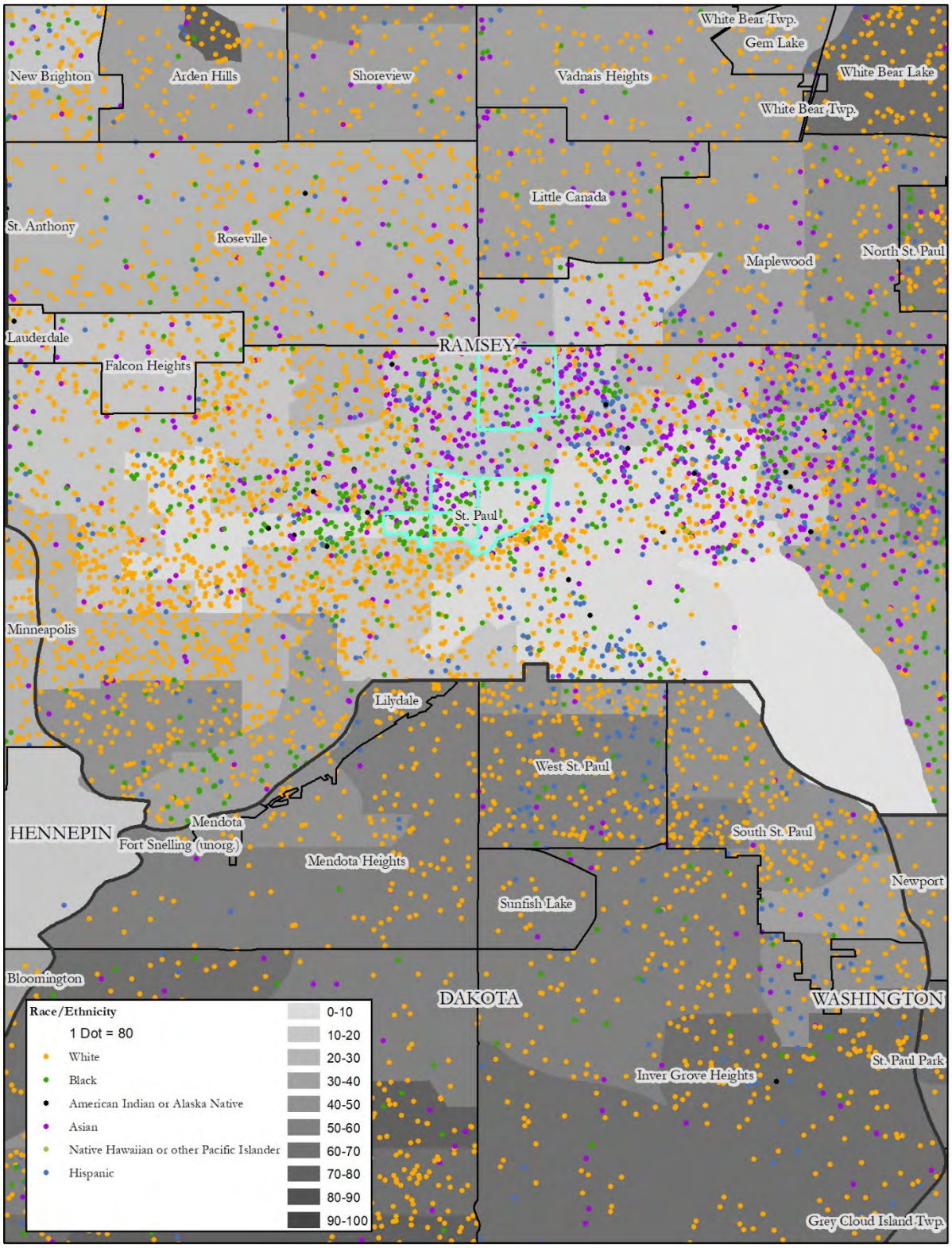
Map 19: Ramsey County, Race, Environmental Health



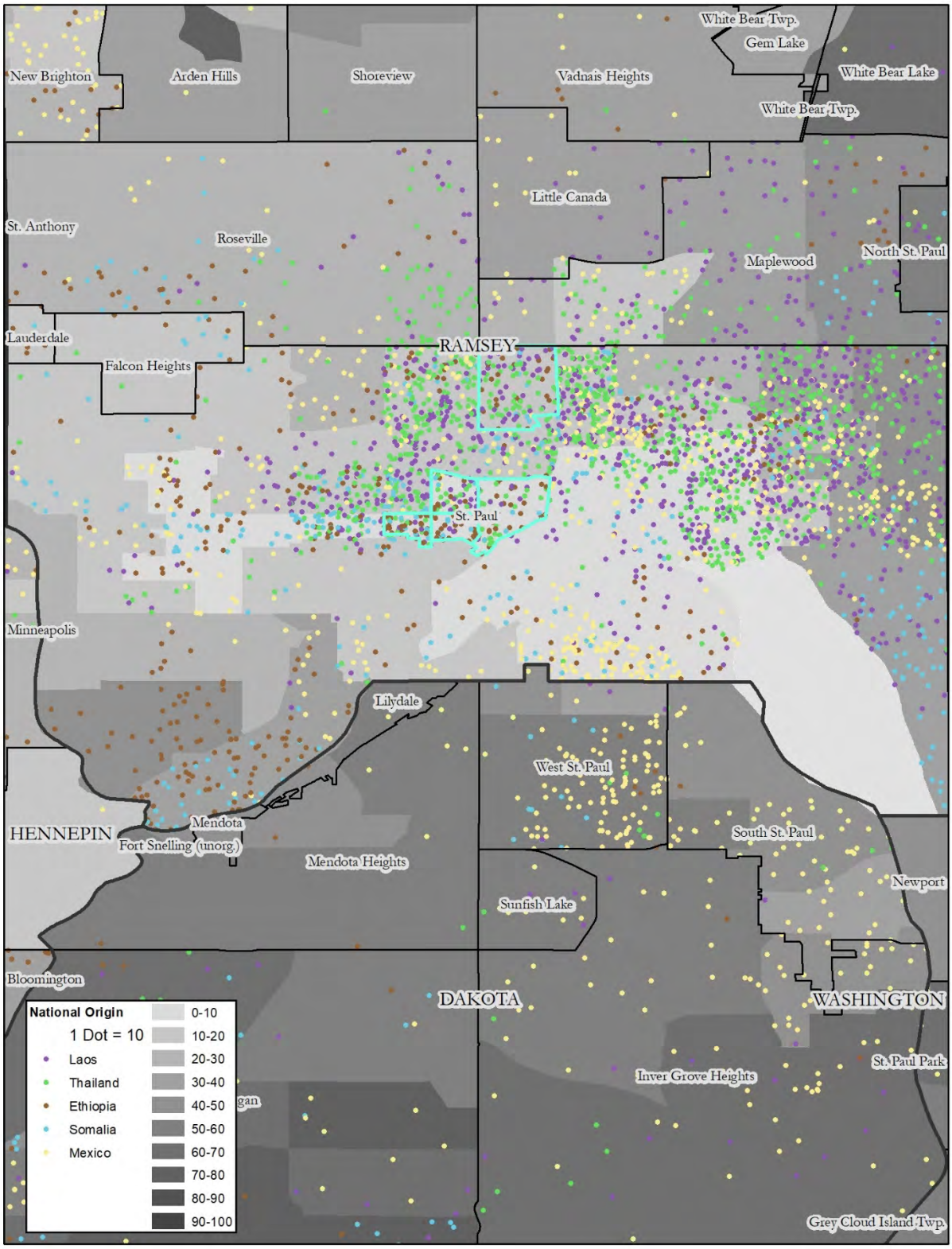
Map 20: Ramsey County, National Origin, Environmental Health



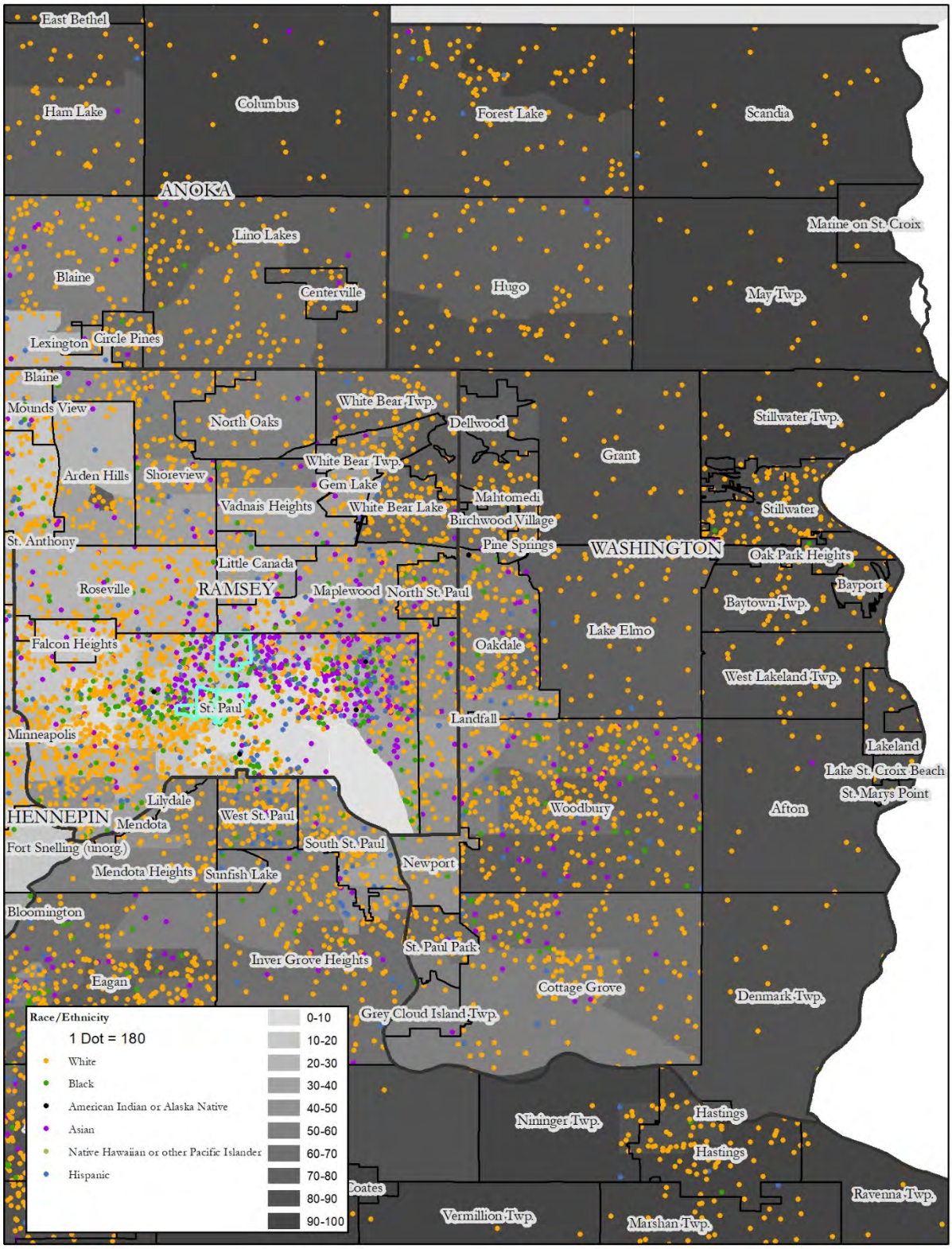
Map 21: St. Paul, Race, Environmental Health



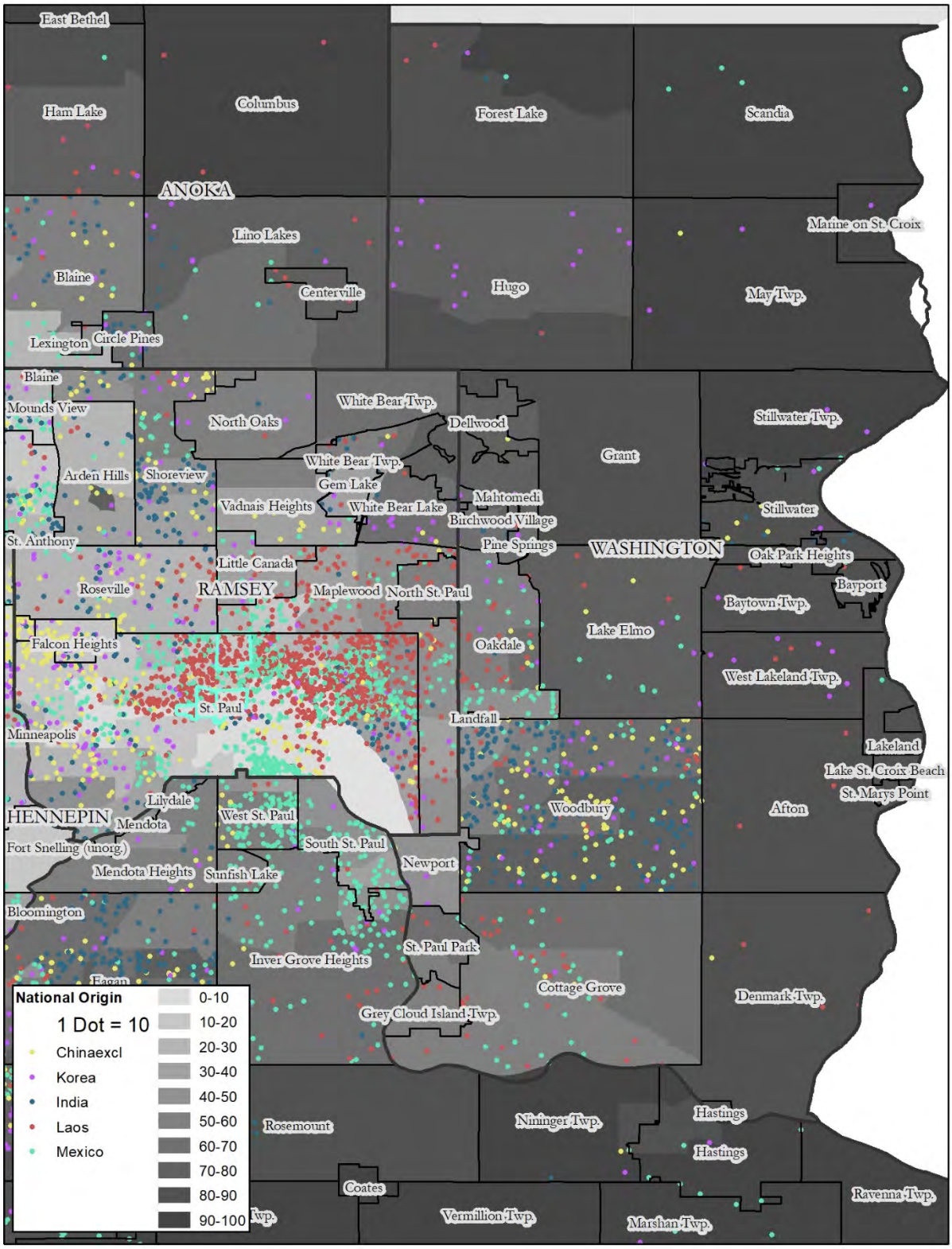
Map 22: St. Paul, National Origin, Environmental Health



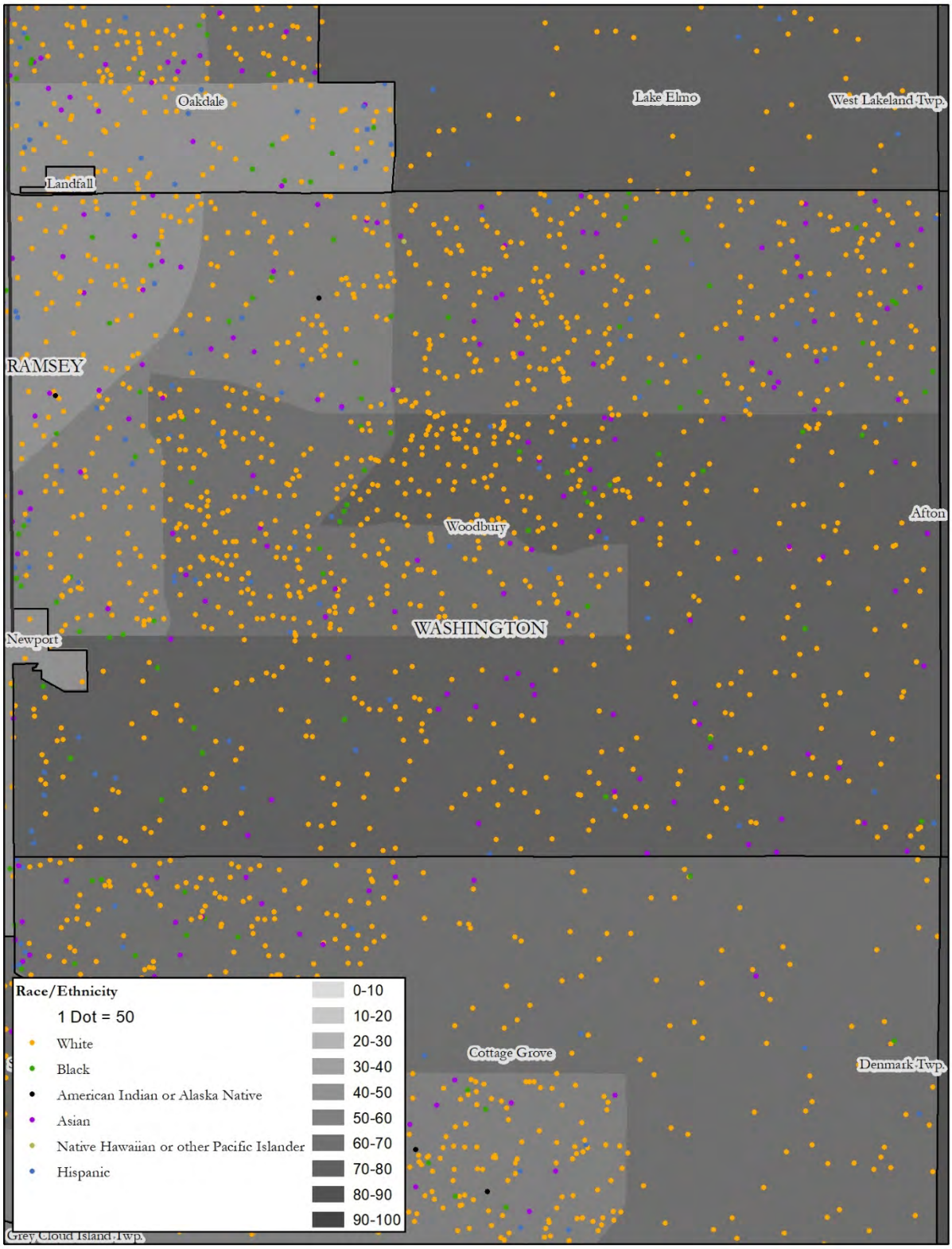
Map 23: Washington County, Race, Environmental Health



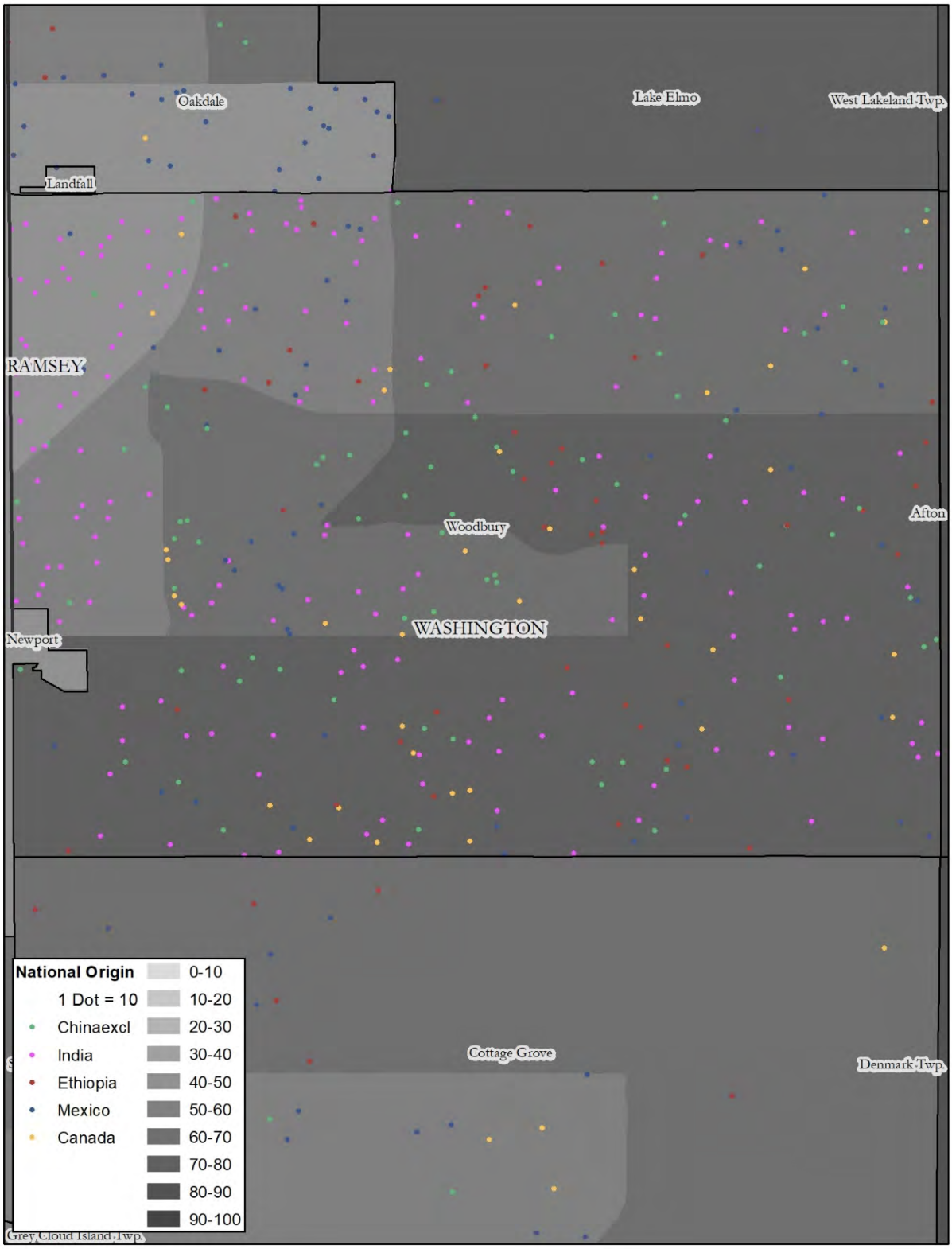
Map 24: Washington County, National Origin, Environmental Health



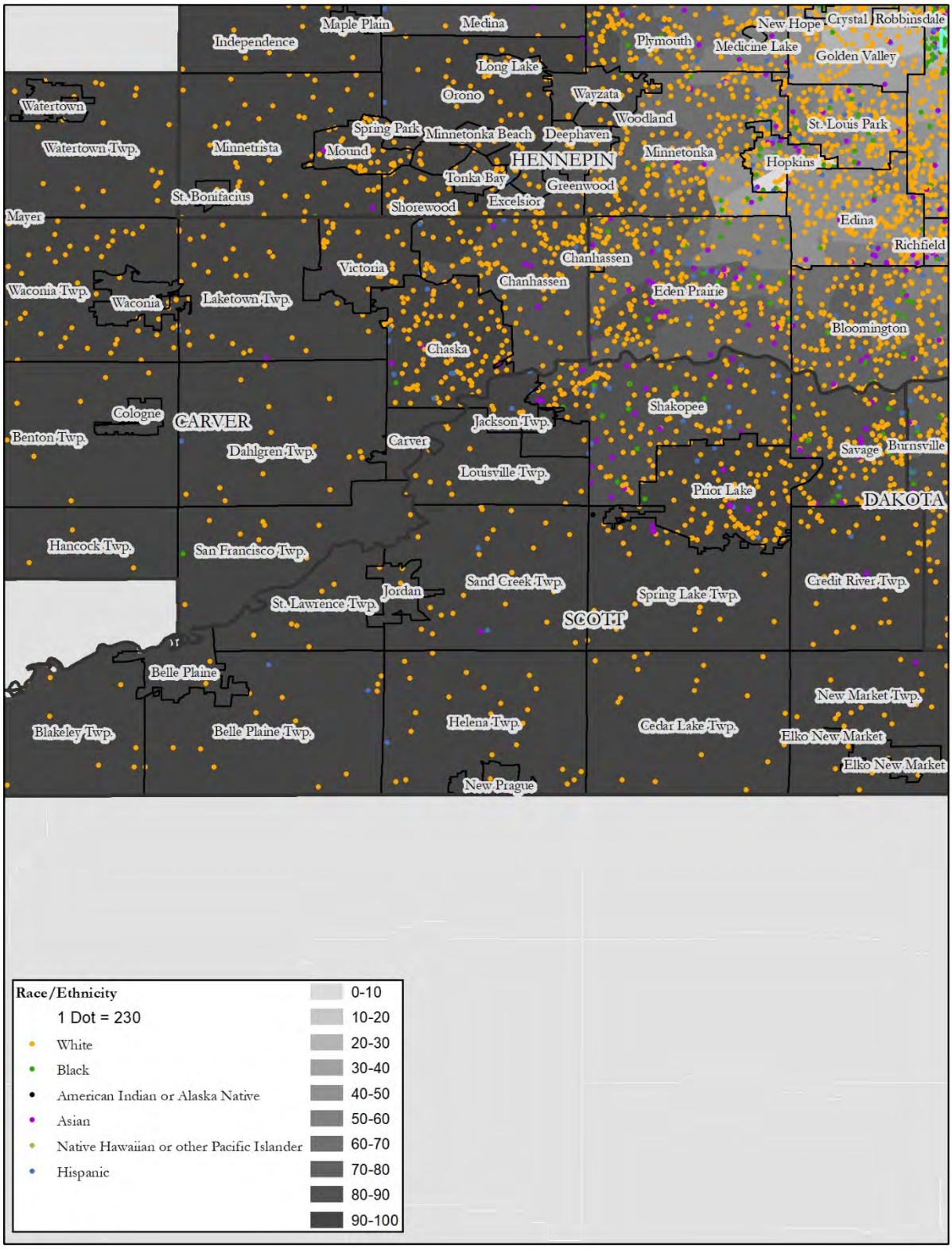
Map 25: Woodbury, Race, Environmental Health



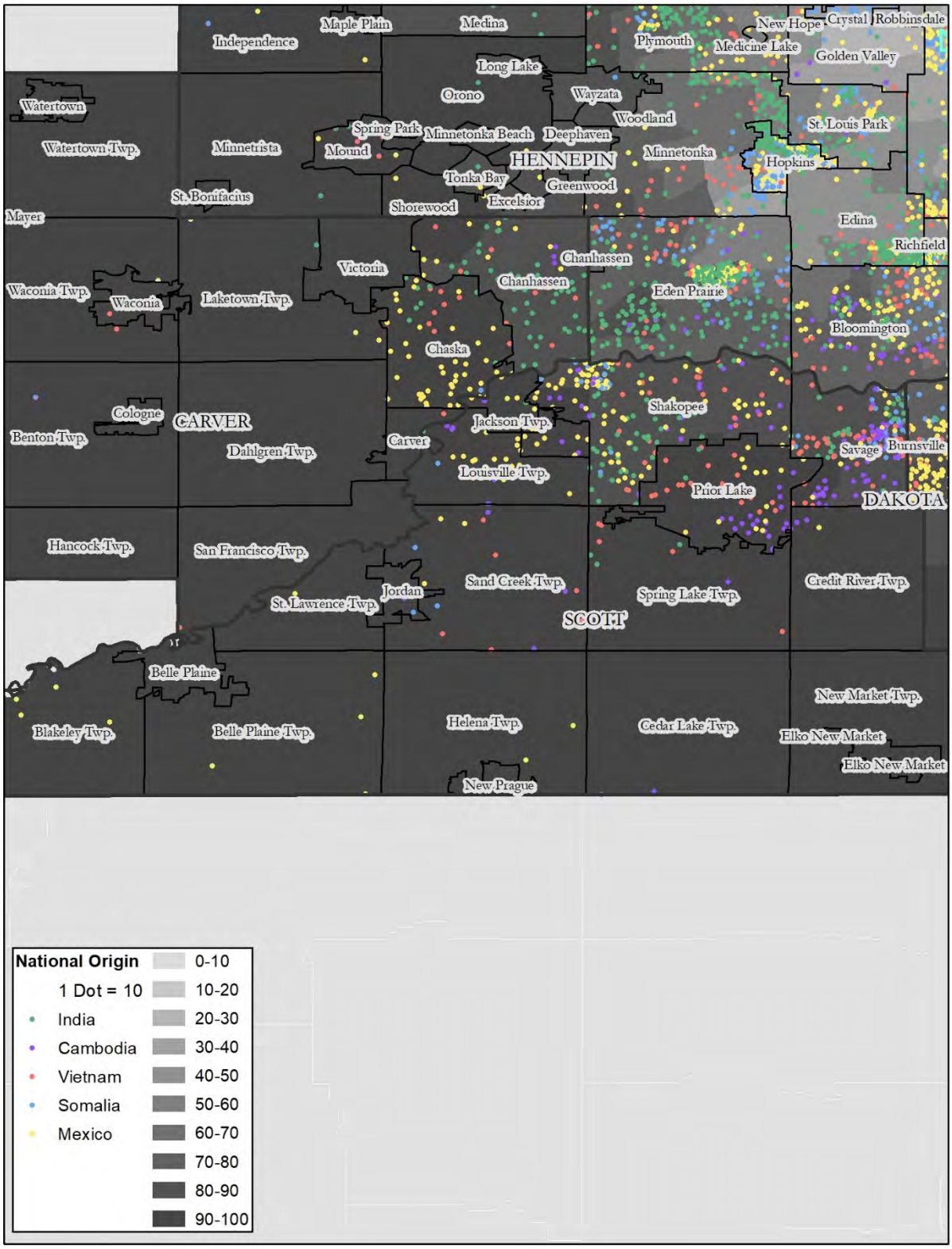
Map 26: Woodbury, National Origin, Environmental Health



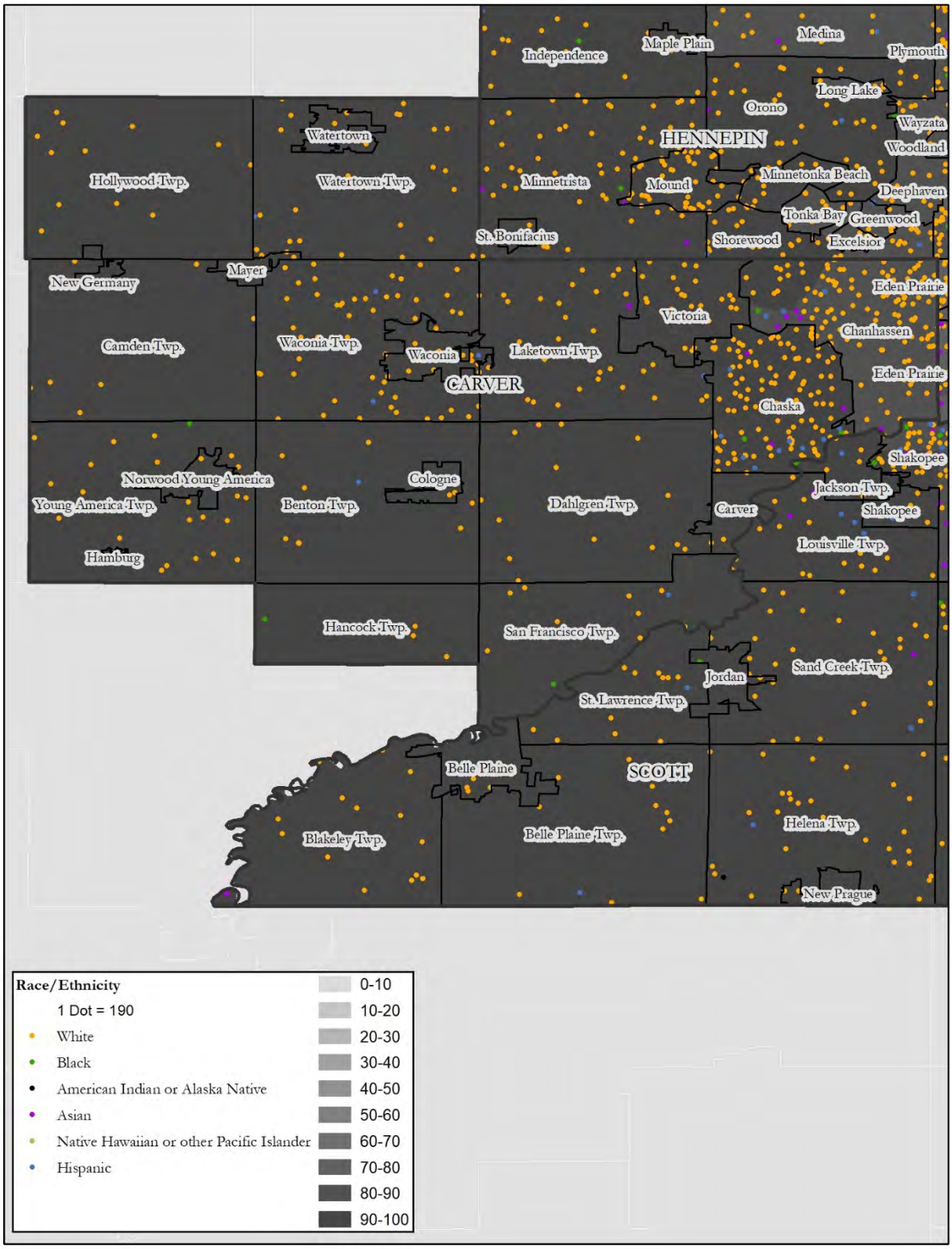
Map 27: Scott County, Race, Environmental Health



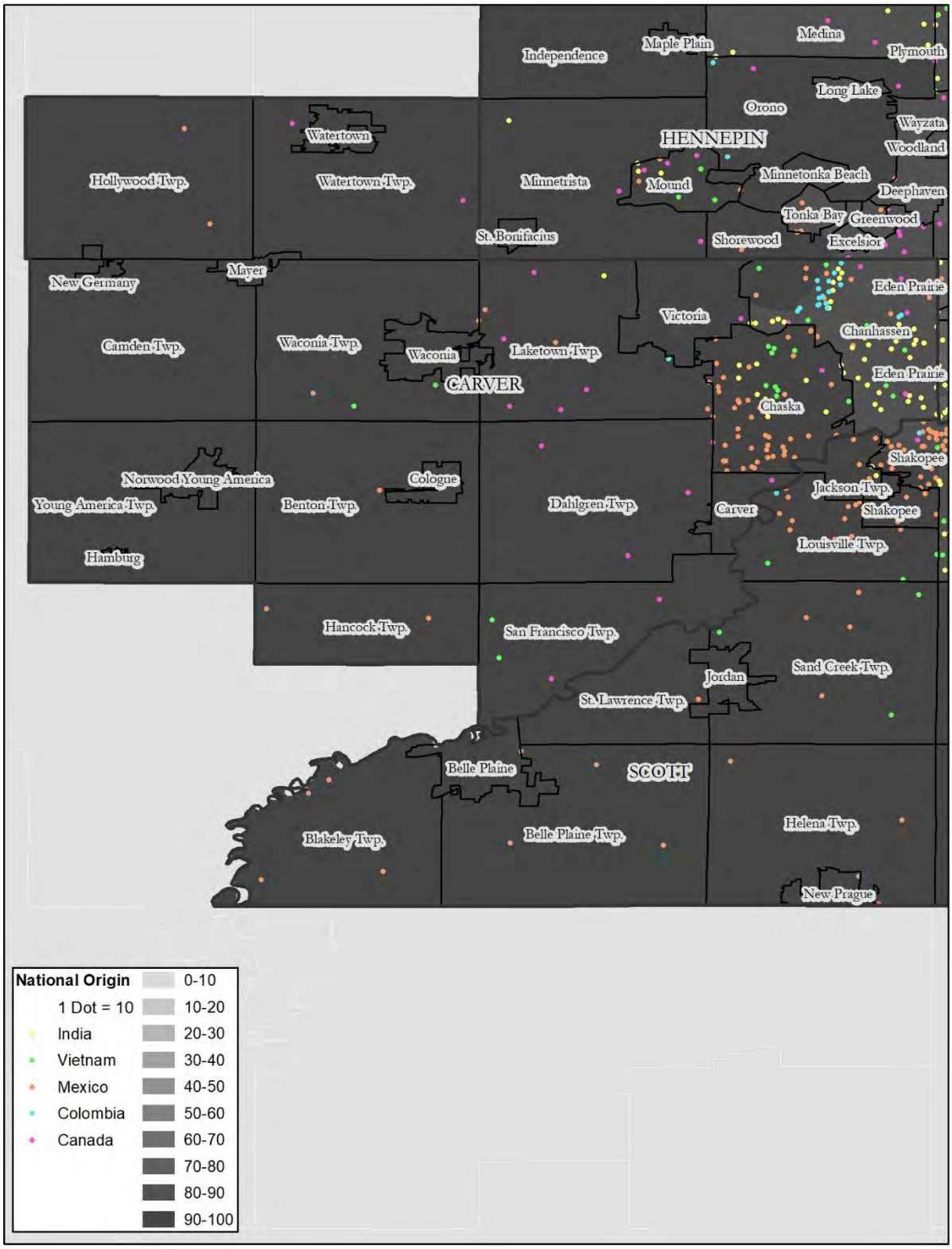
Map 28: Scott County, National Origin, Environmental Health



Map 29: Carver County, Race, Environmental Health



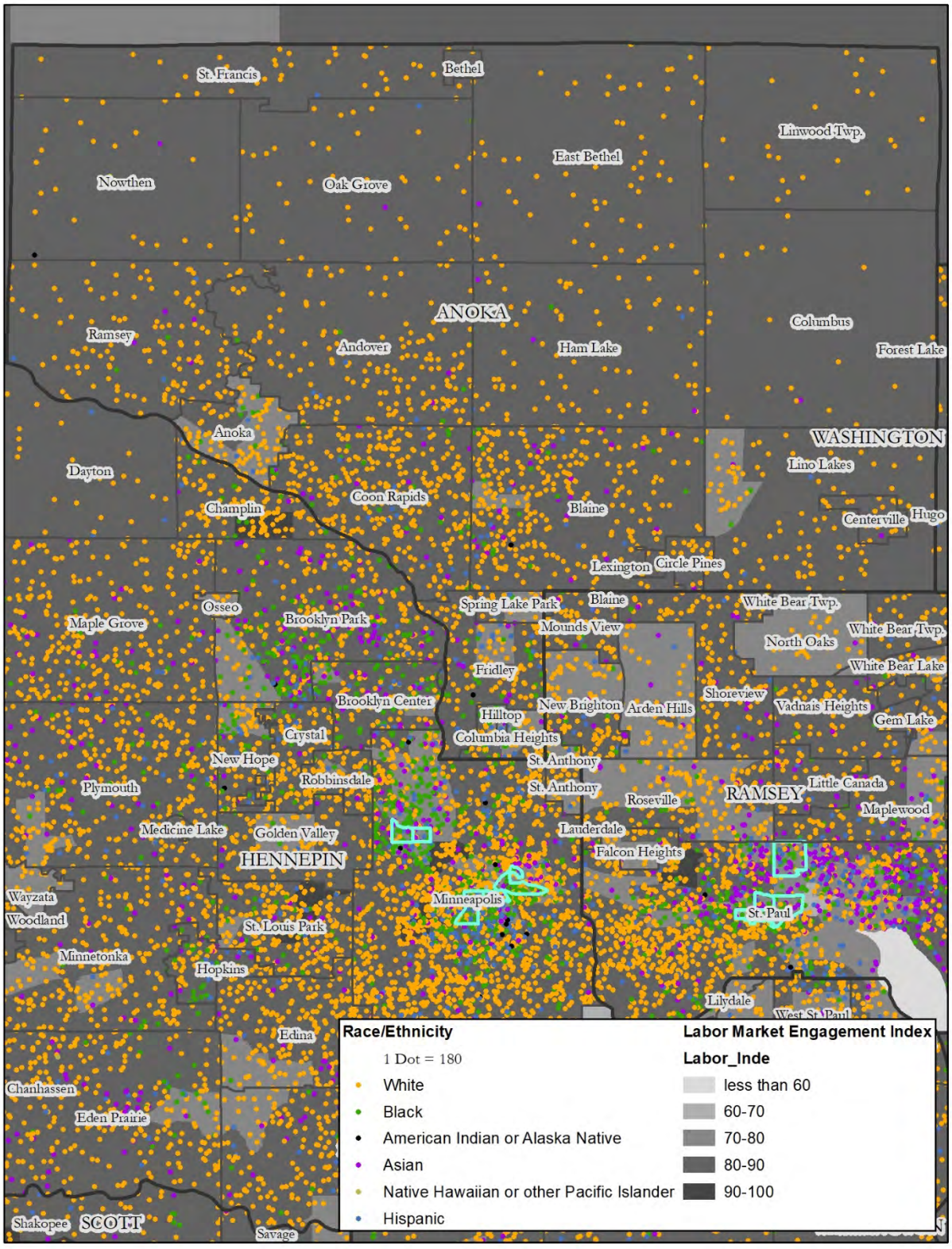
Map 30: Carver County, National Origin, Environmental Health



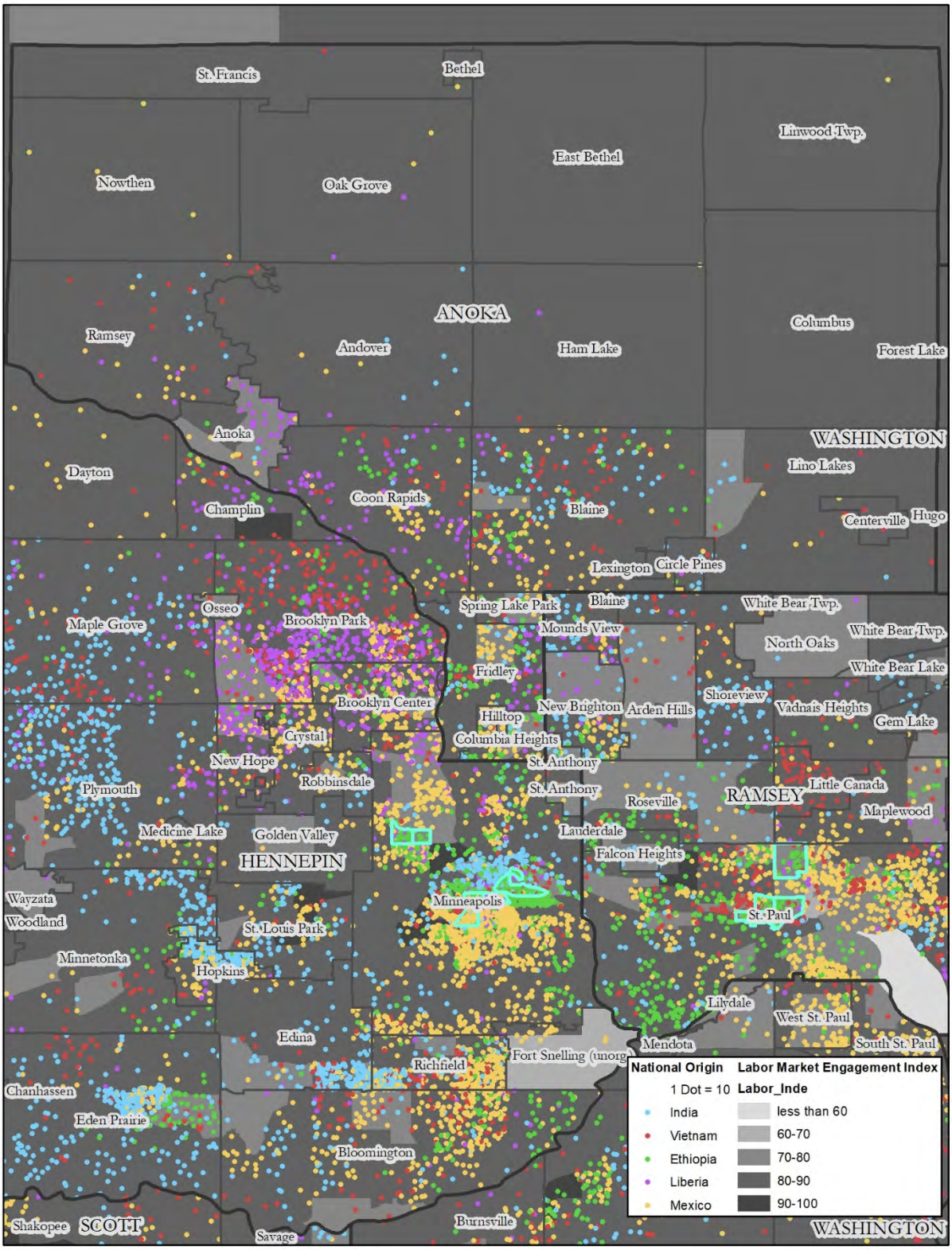
Economic Opportunities Maps

1. **Labor Market Index**
2. **Jobs Proximity Index**

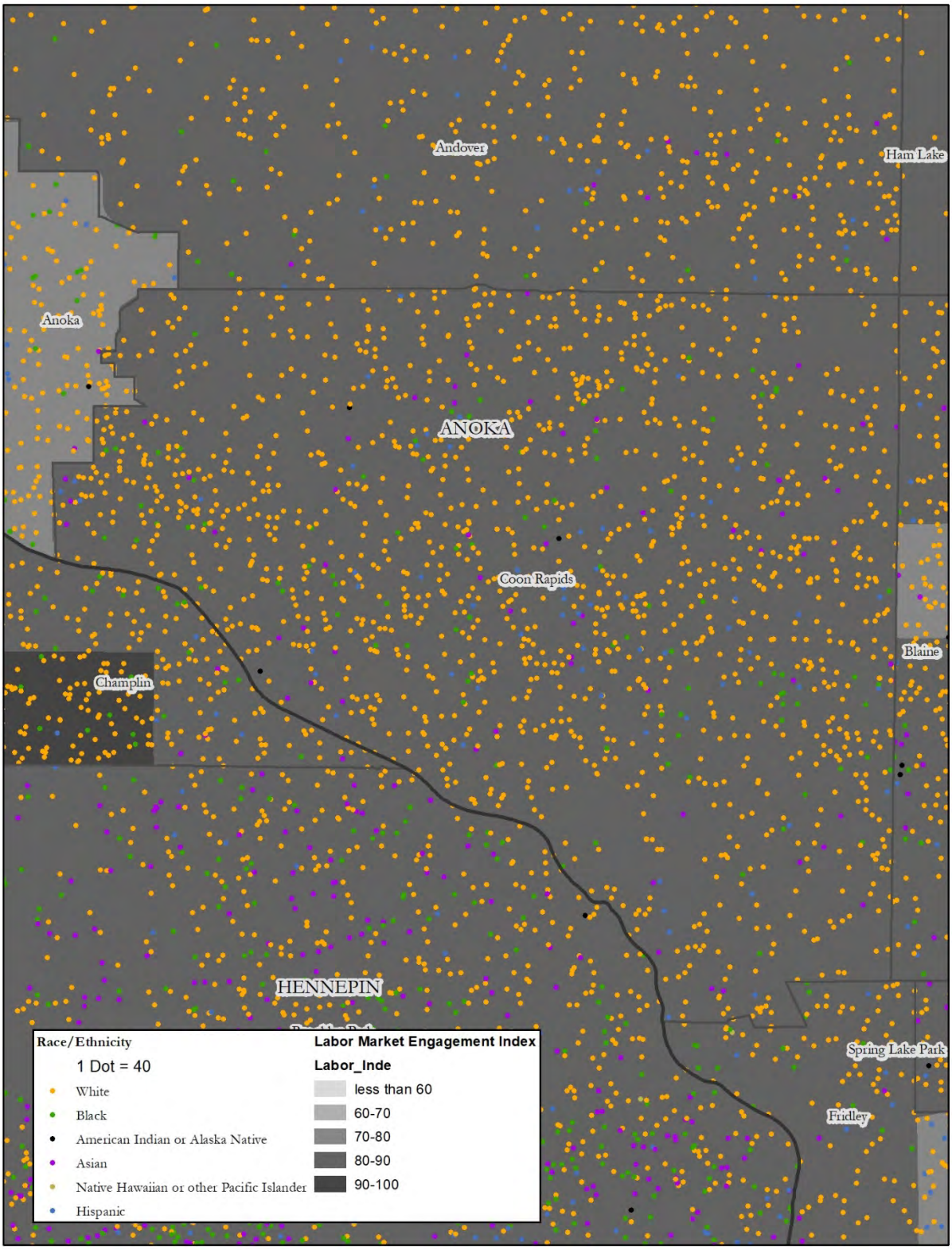
Map 1: Anoka County, Race, Labor Market Index



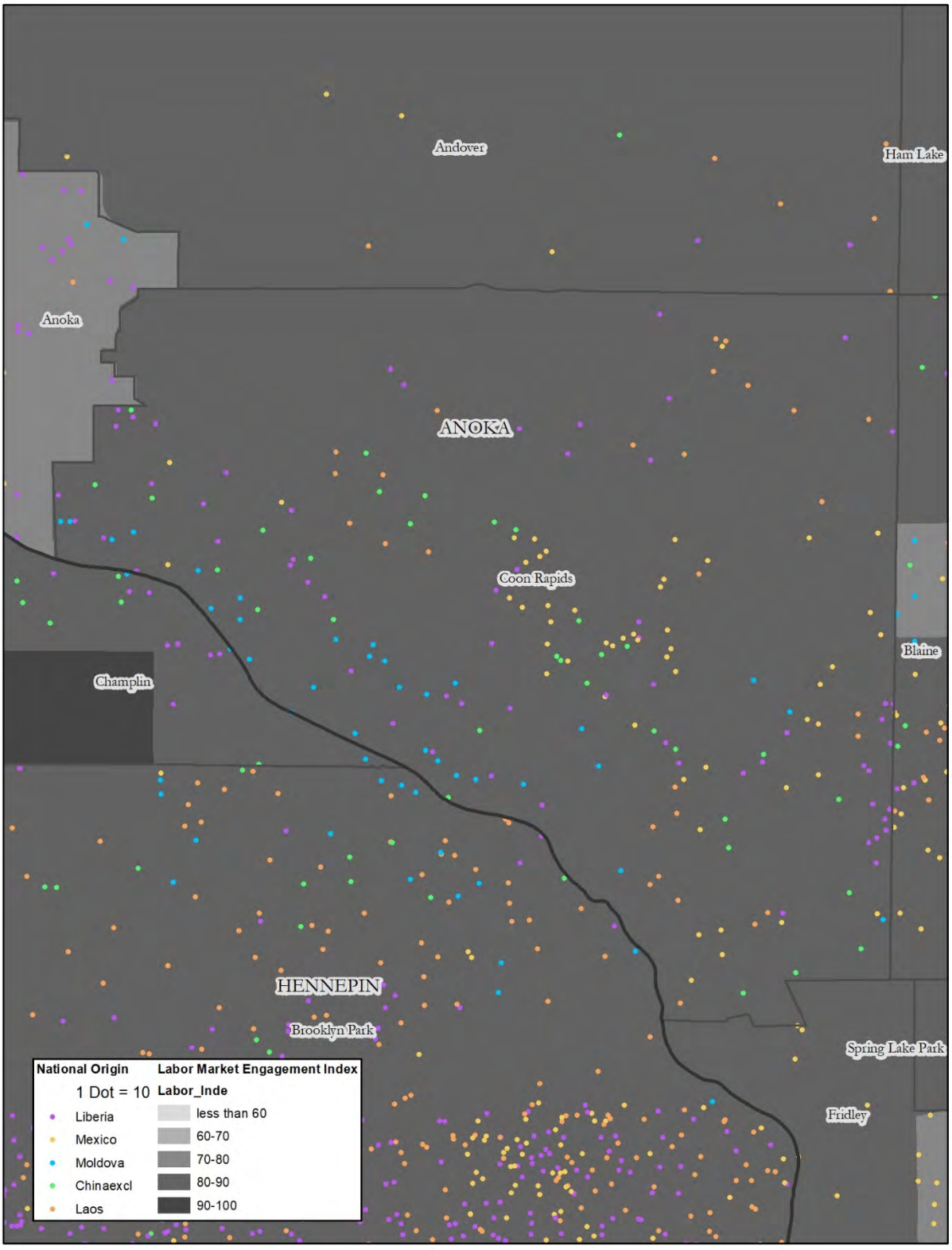
Map 2: Anoka County, National Origin, Labor Market Index



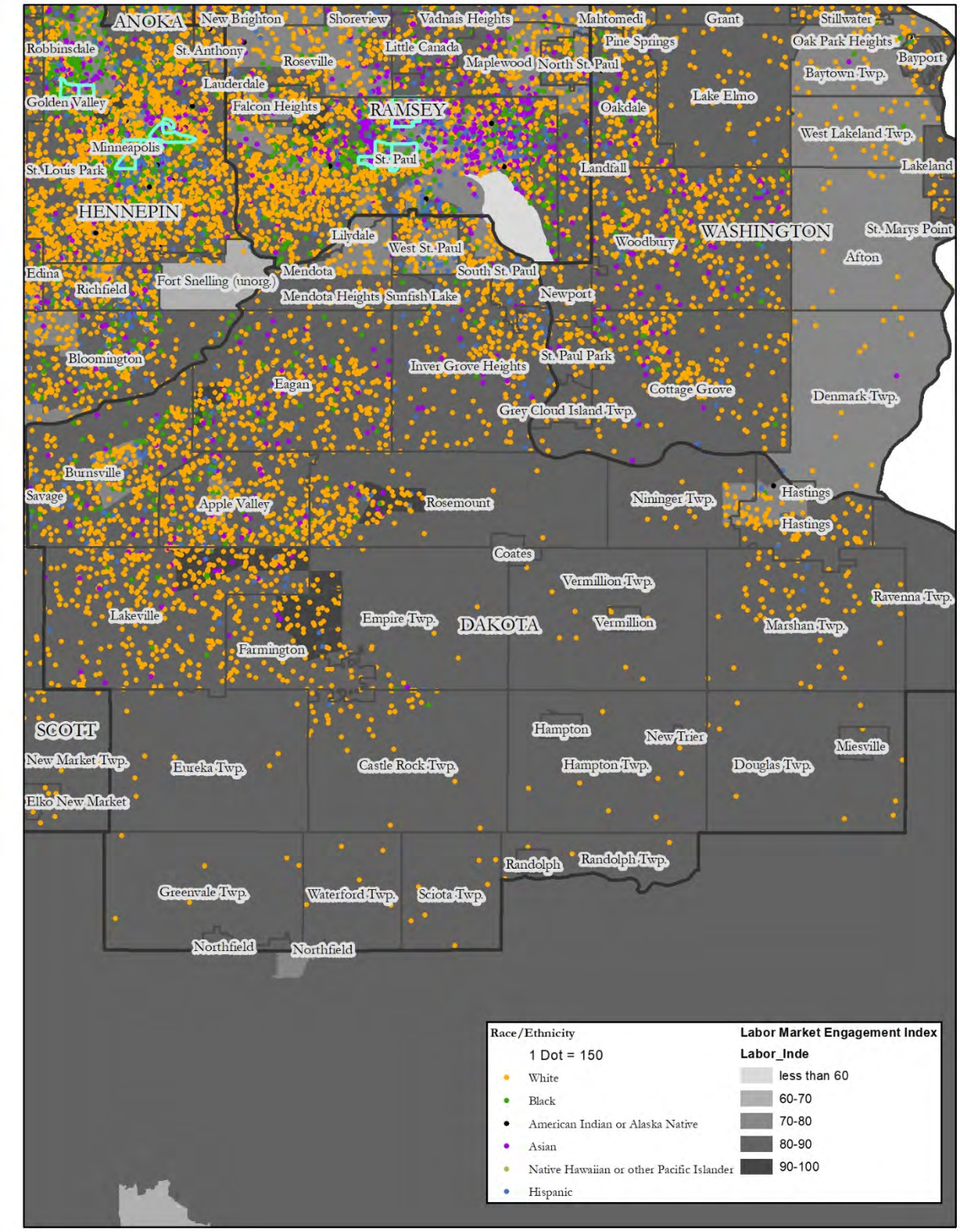
Map 3: Coon Rapids, Race, Labor Market Index



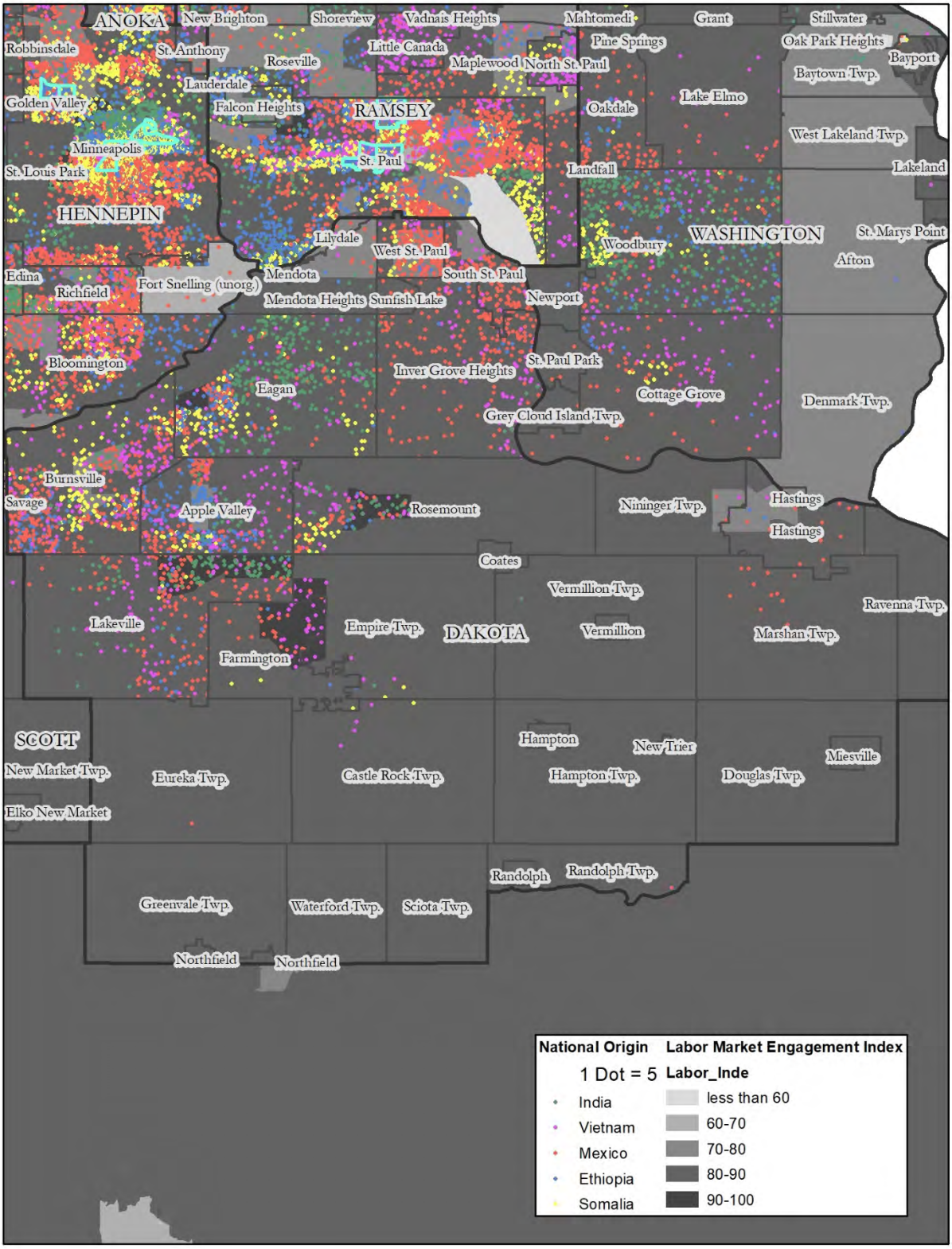
Map 4: Coon Rapids, National Origin, Labor Market Index



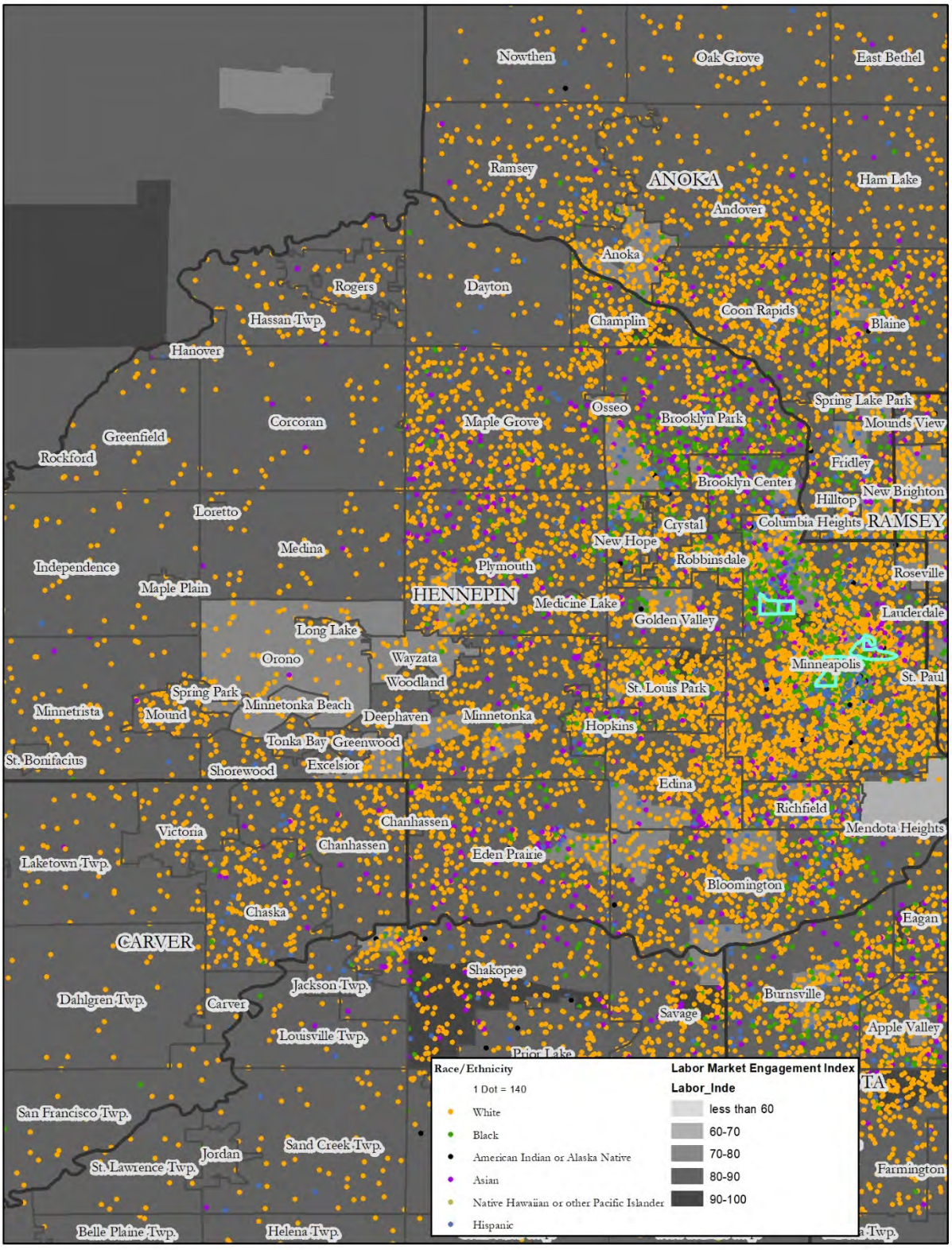
Map 5: Dakota County, Race, Labor Market Index



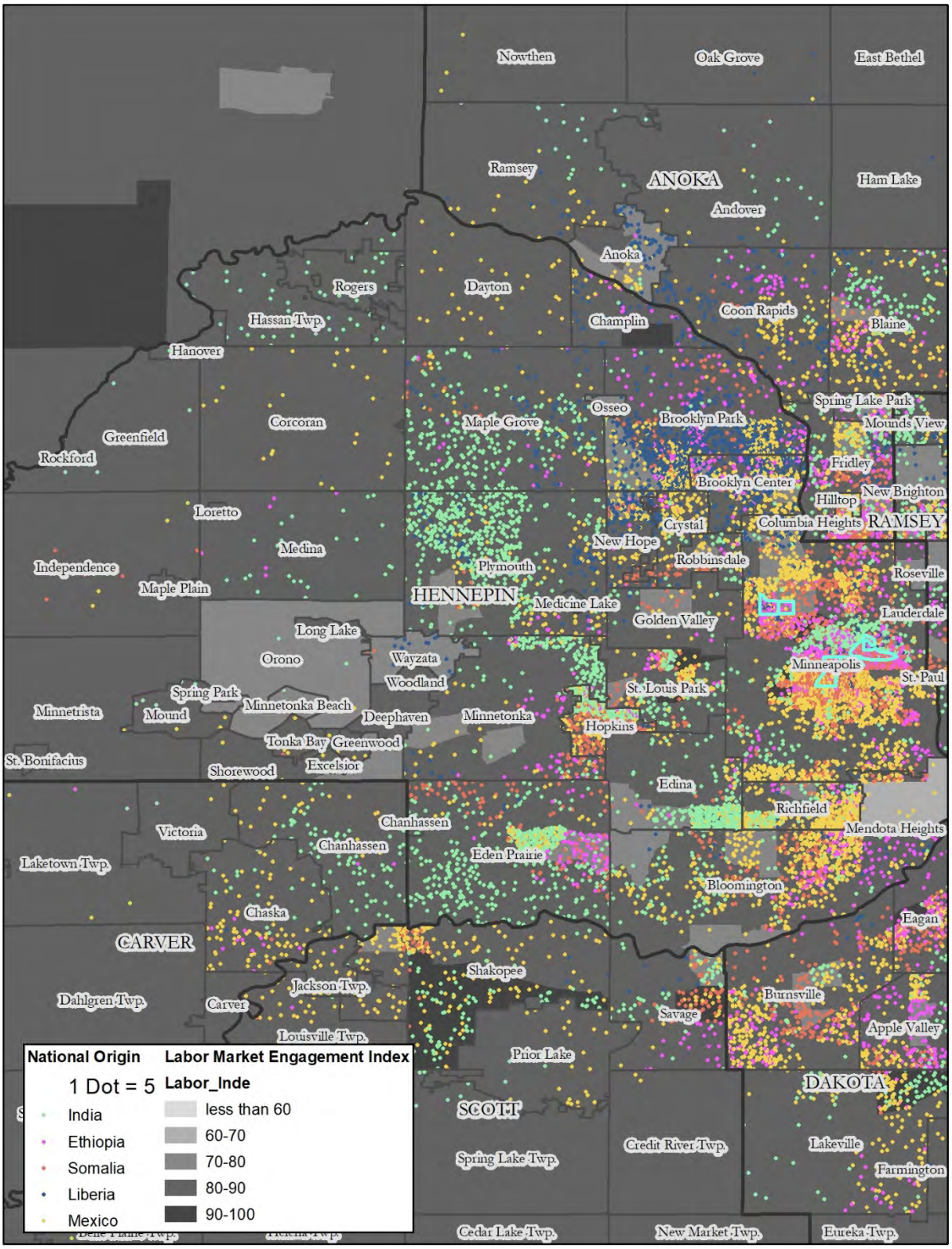
Map 6: Dakota County, National Origin, Labor Market Index



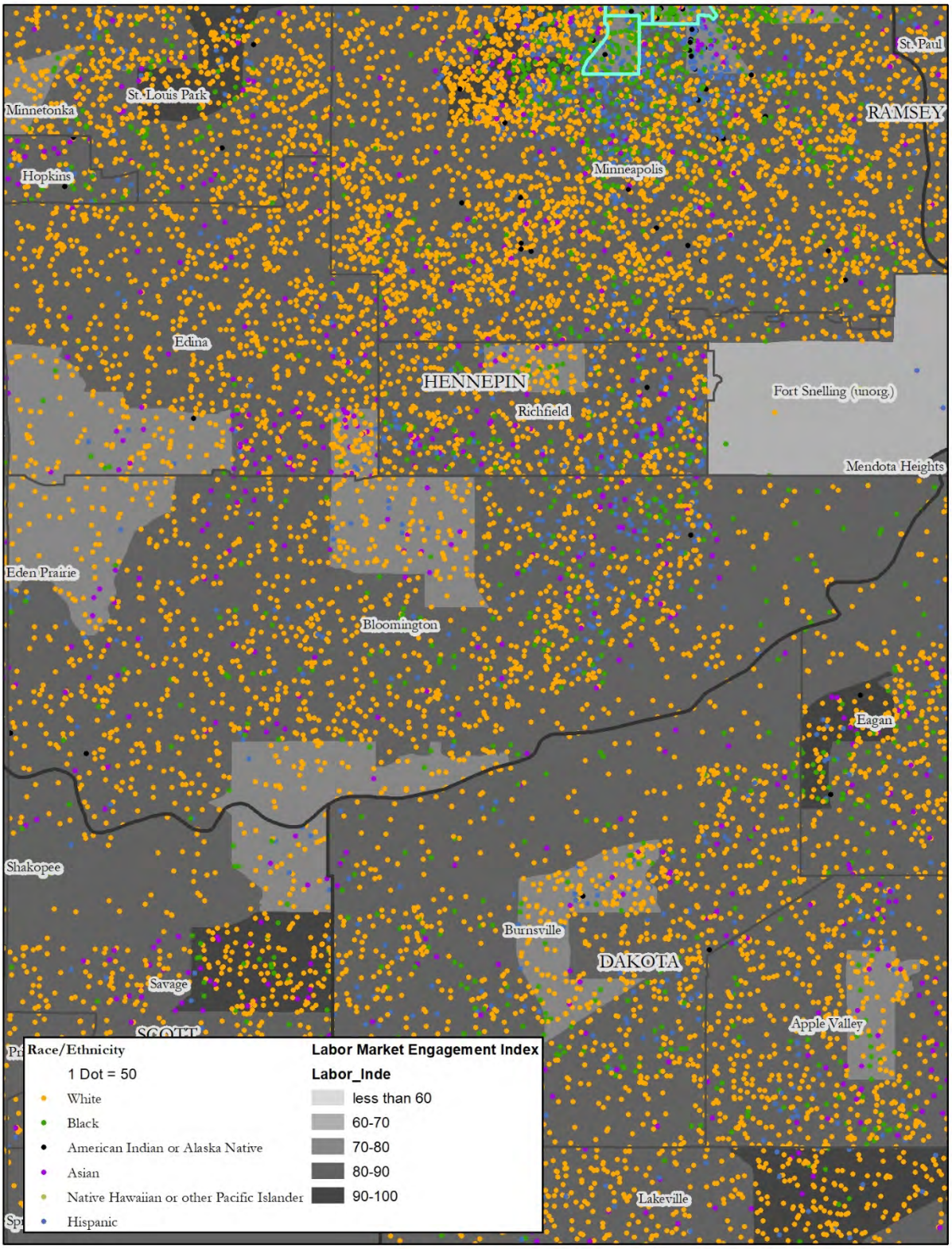
Map 7: Hennepin County, Race, Labor Market Index



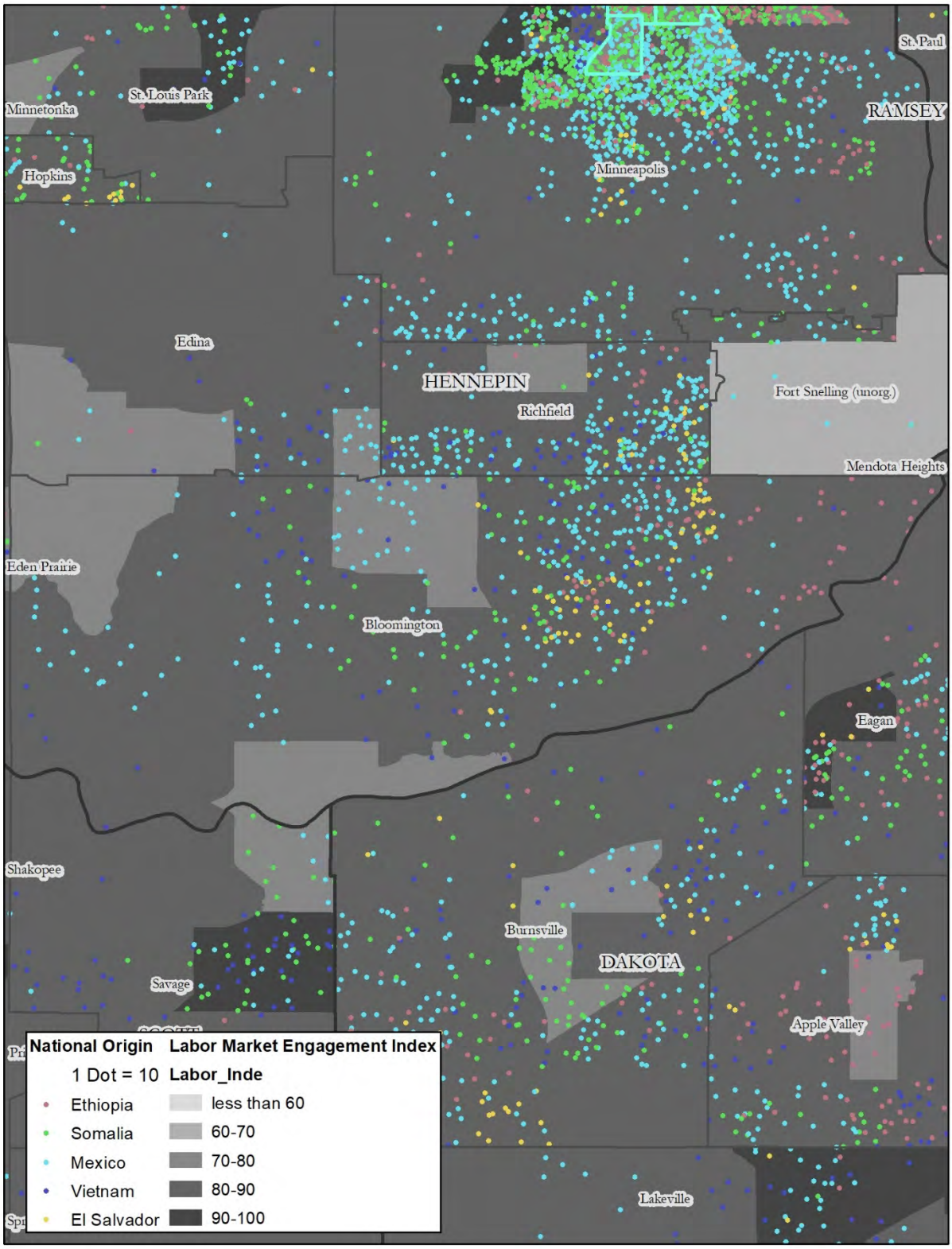
Map 8: Hennepin County, National Origin, Labor Market Index



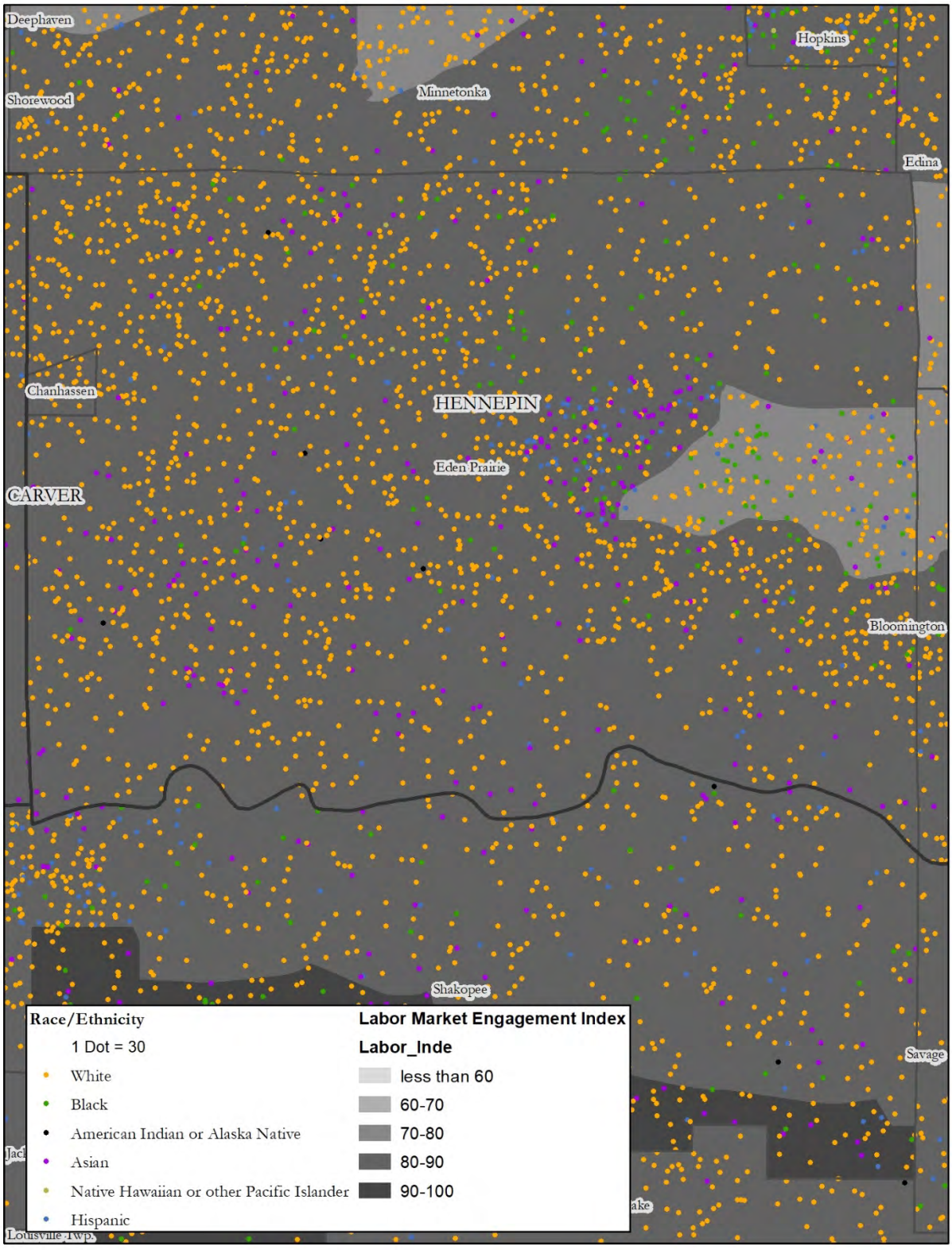
Map 9: Bloomington, Race, Labor Market Index



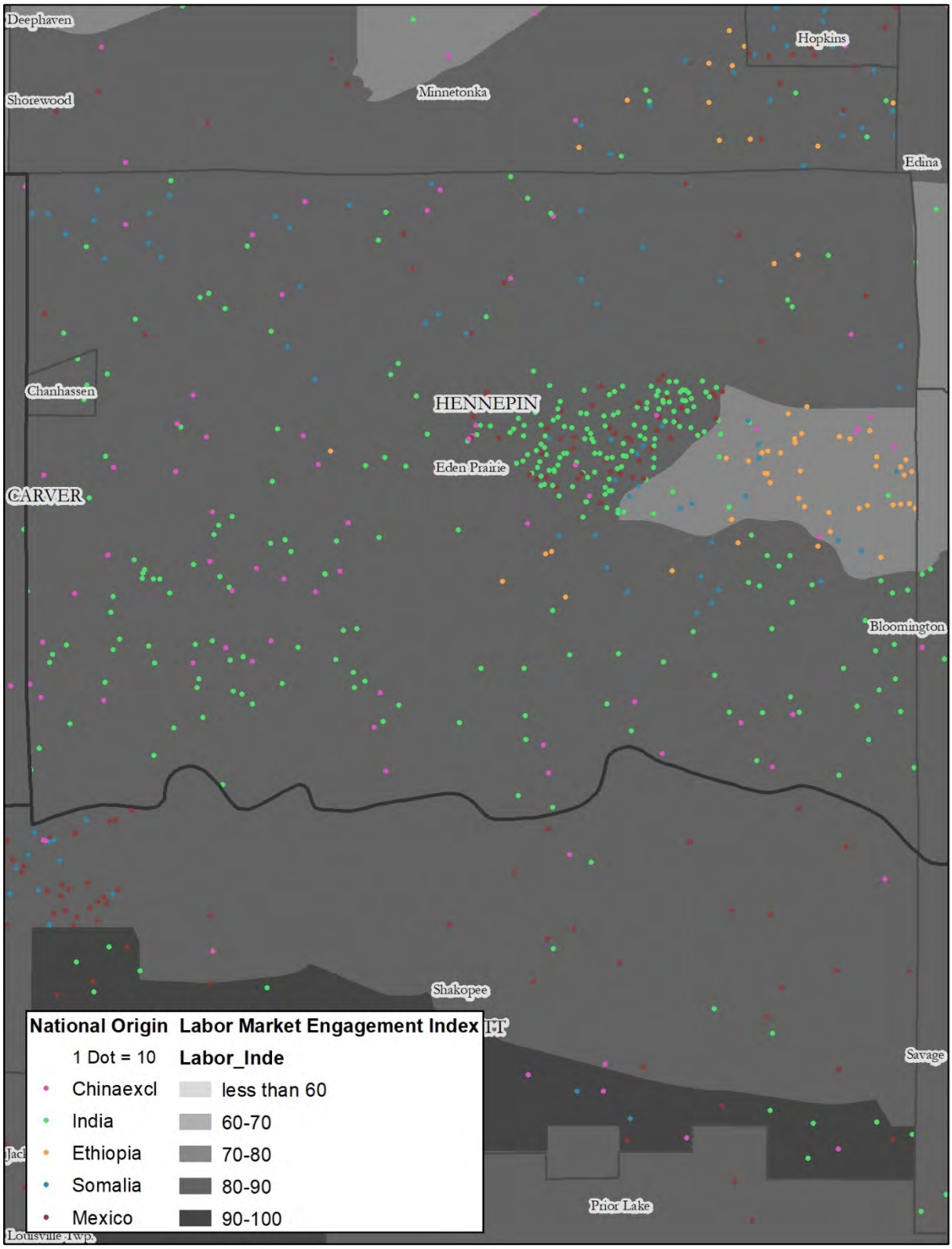
Map 10: Bloomington, National Origin, Labor Market Index



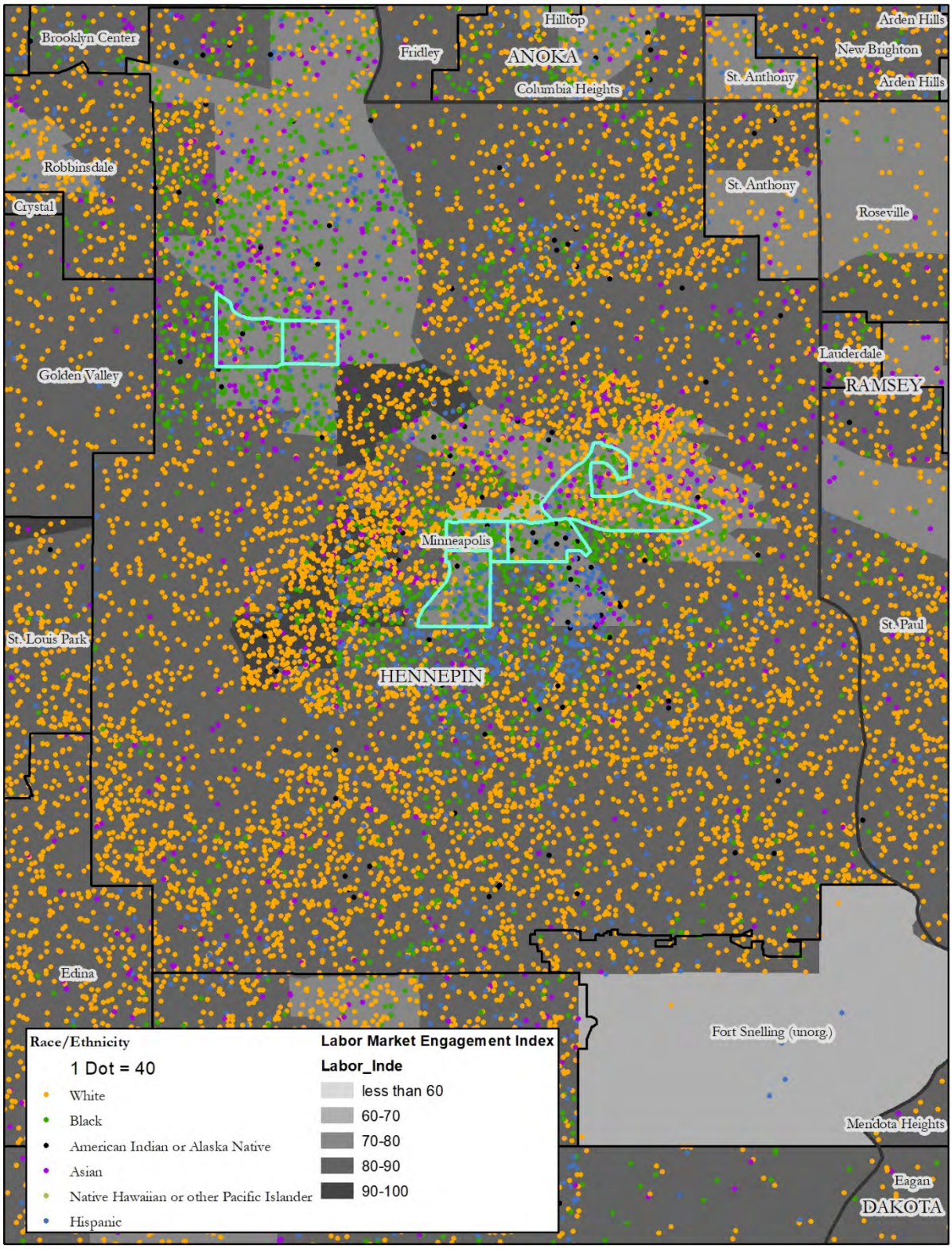
Map 11: Eden Prairie, Race, Labor Market Index



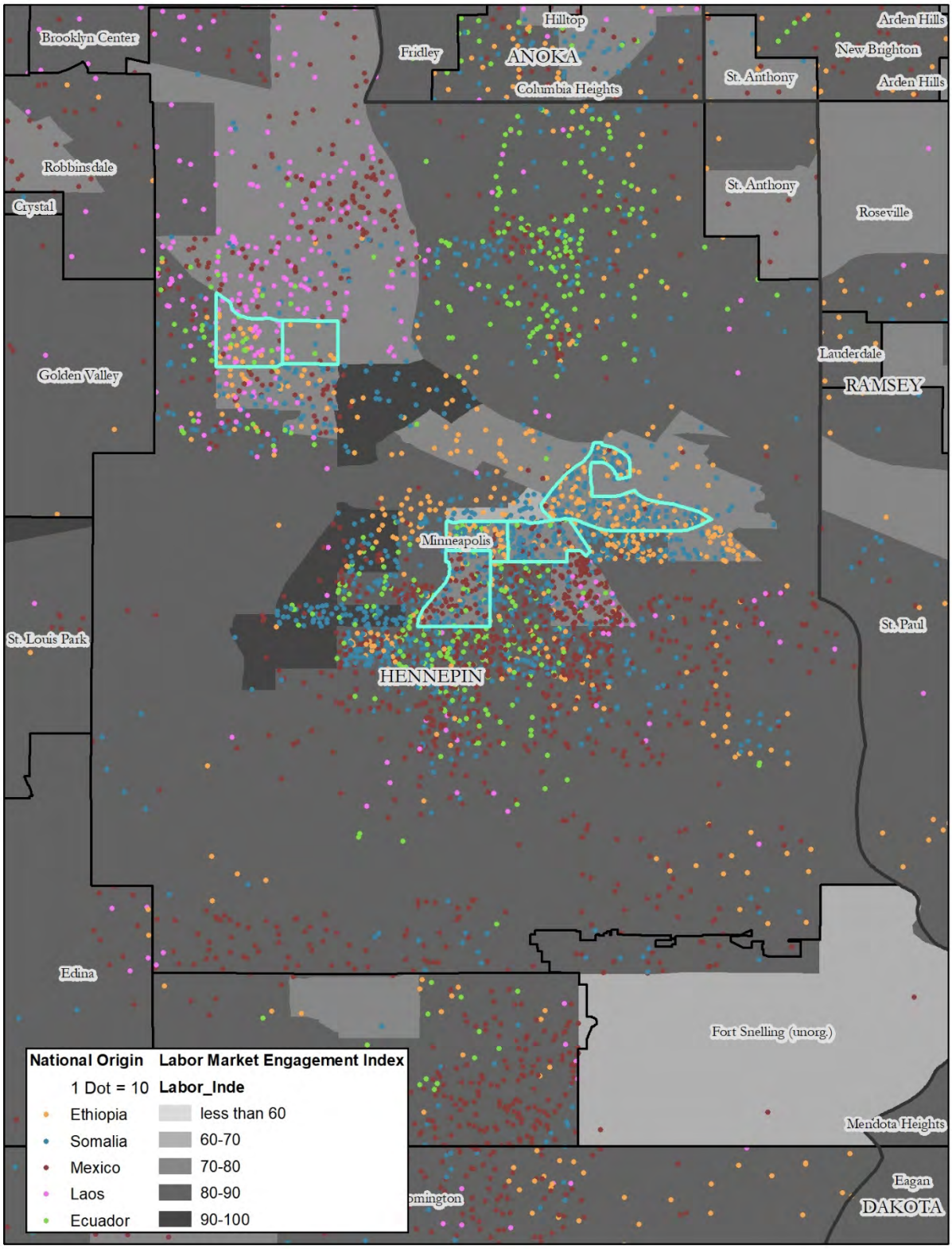
Map 12: Eden Prairie, National Origin, Labor Market Index



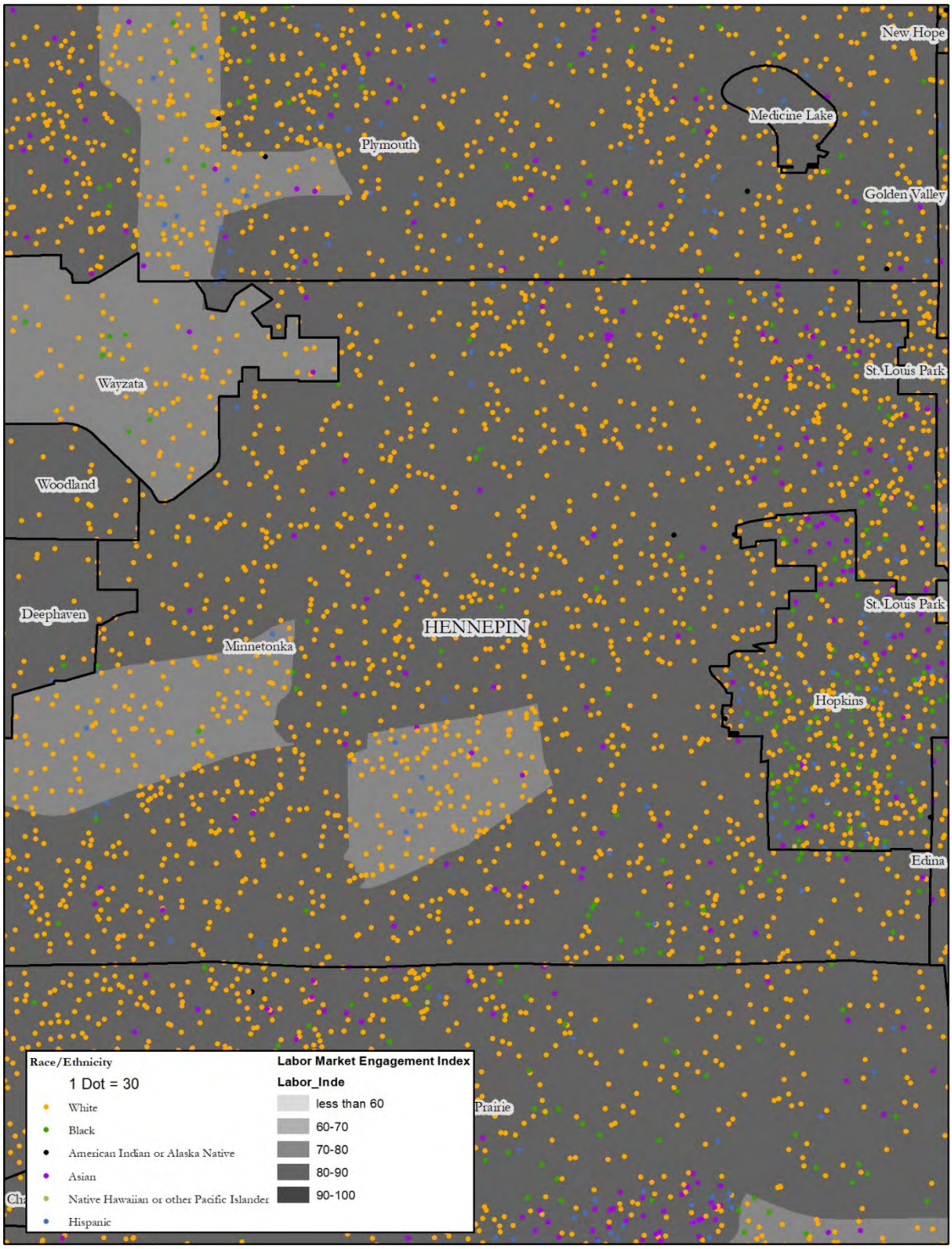
Map 13: Minneapolis, Race, Labor Market Index



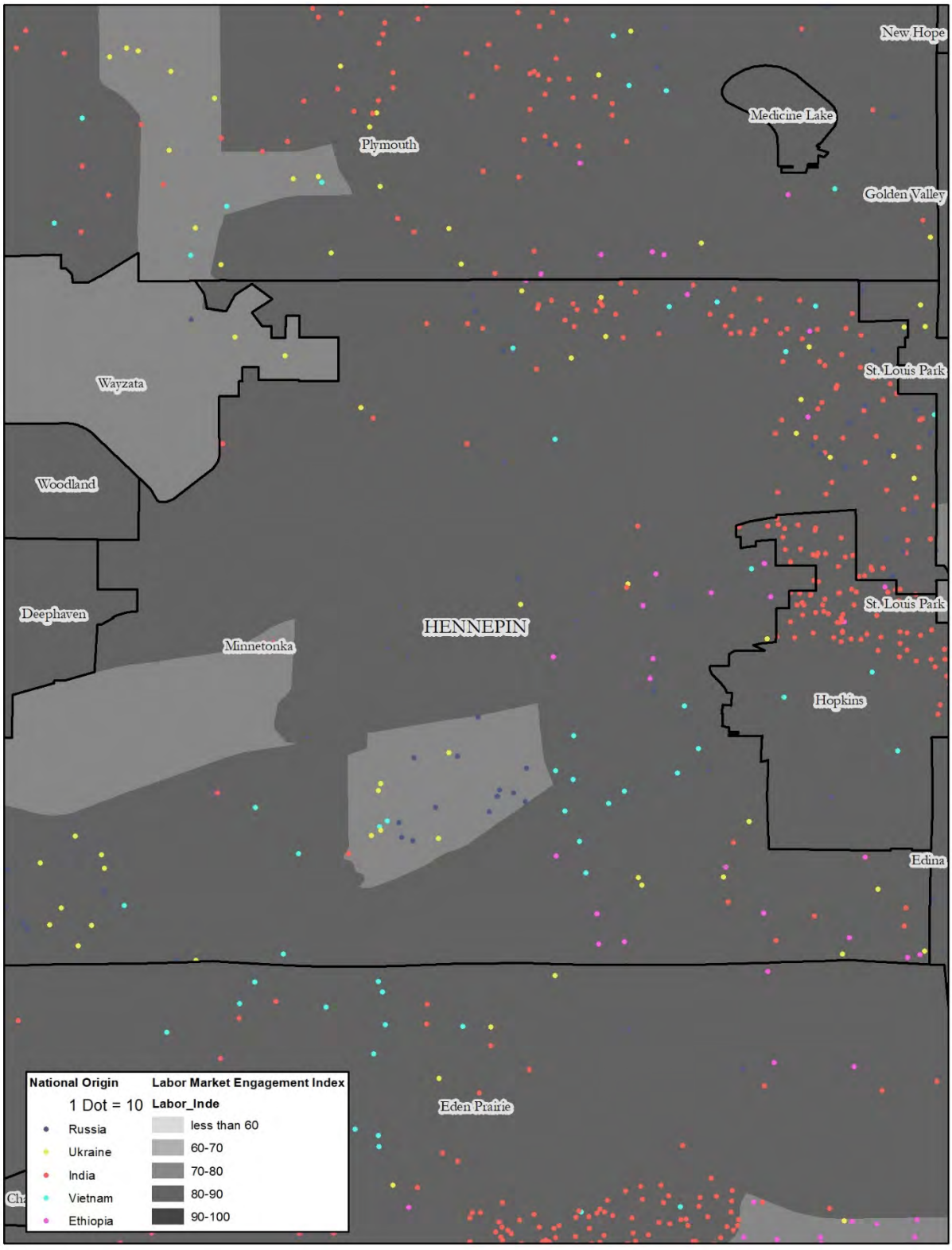
Map 14: Minneapolis, National Origin, Labor Market Index



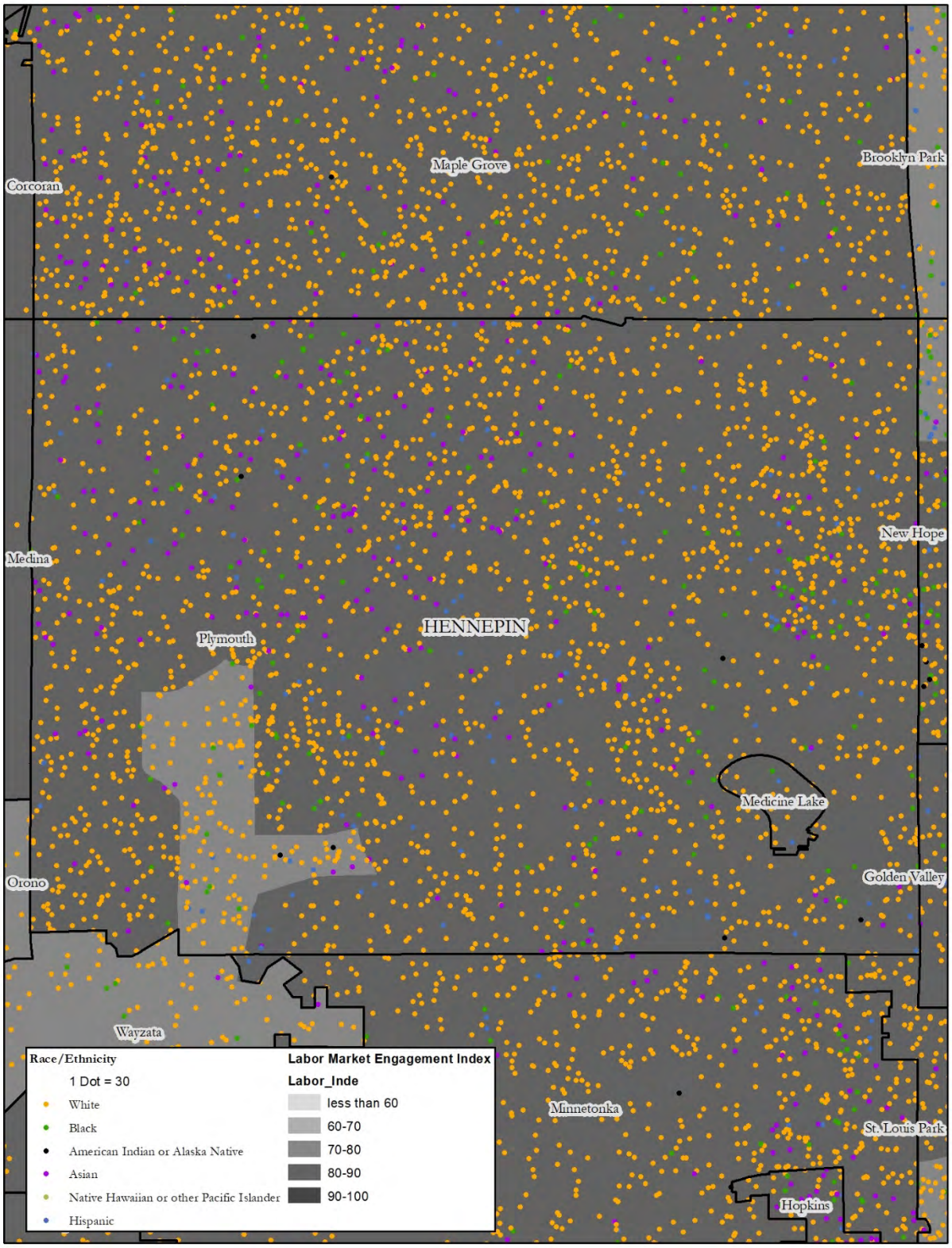
Map 15: Minnetonka, Race, Labor Market Index



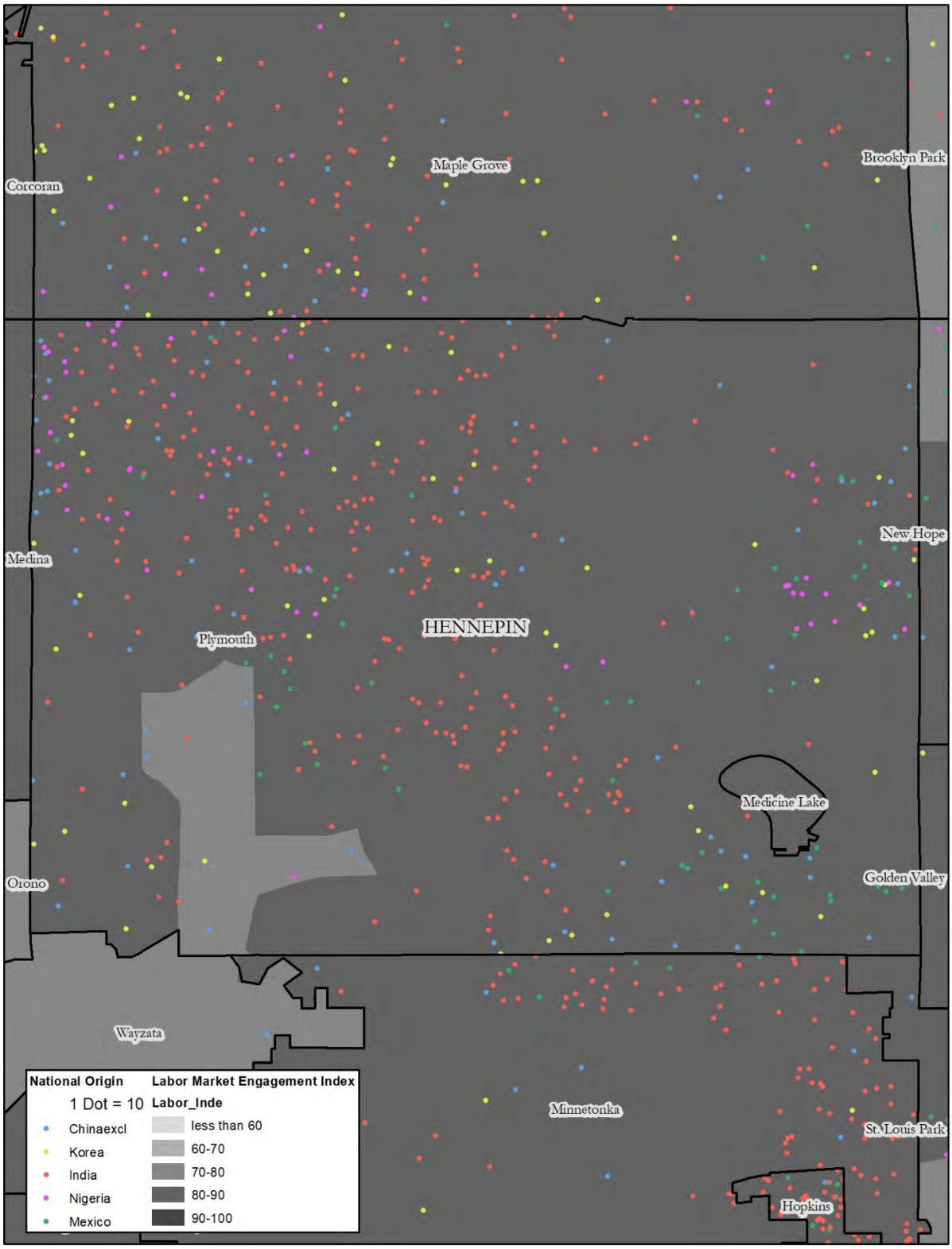
Map 16: Minnetonka, National Origin, Labor Market Index



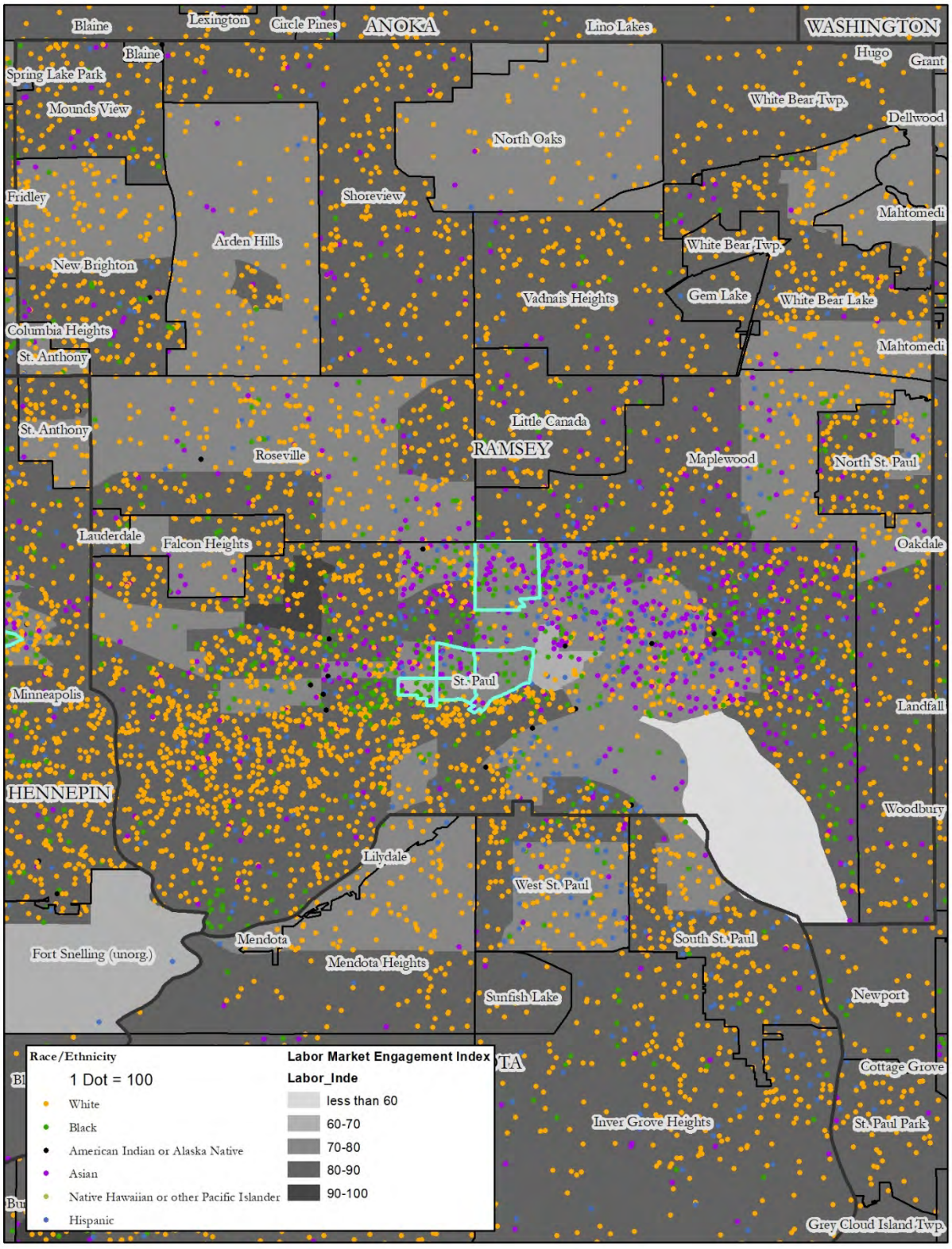
Map 17: Plymouth, Race, Labor Market Index



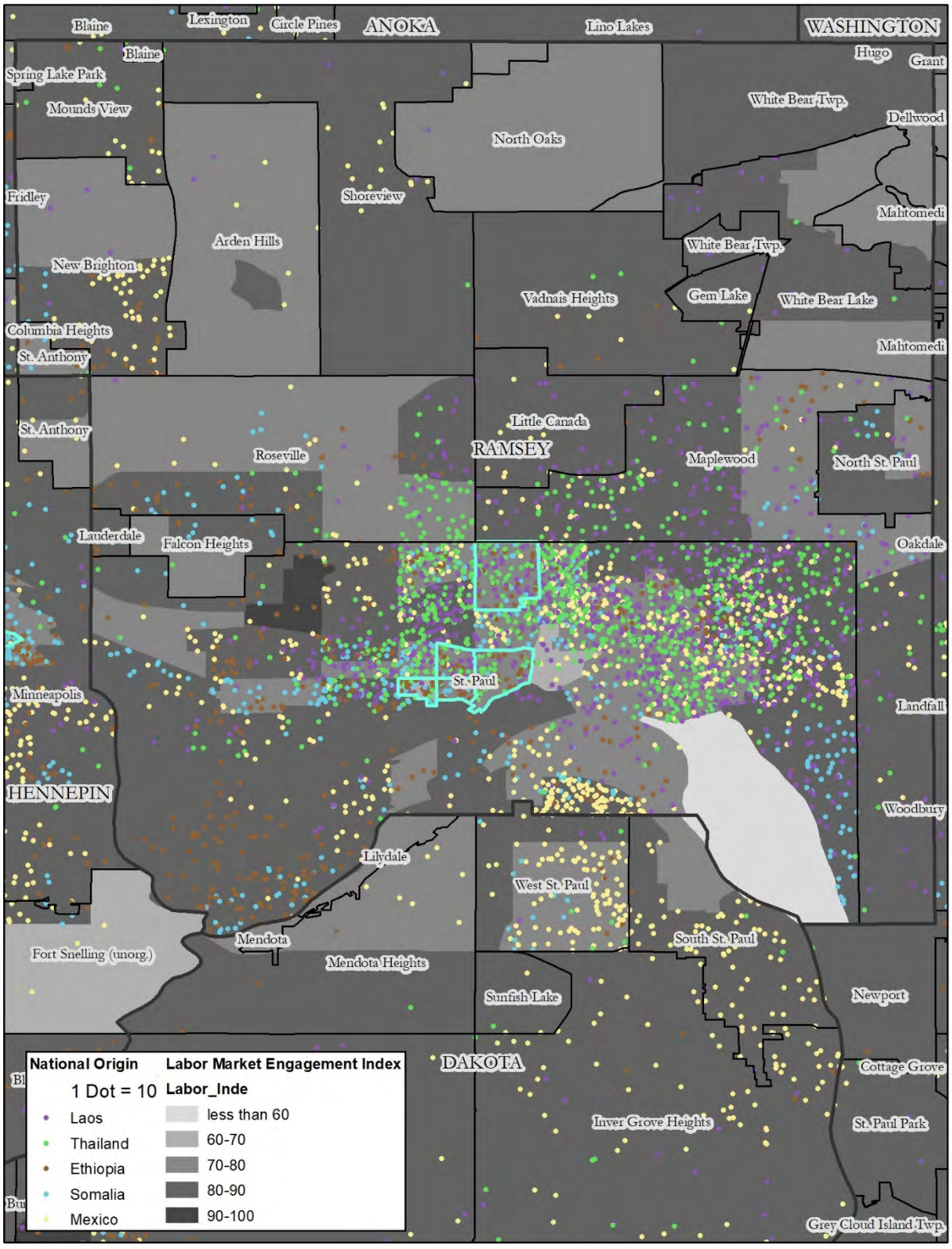
Map 18: Plymouth, National Origin, Labor Market Index



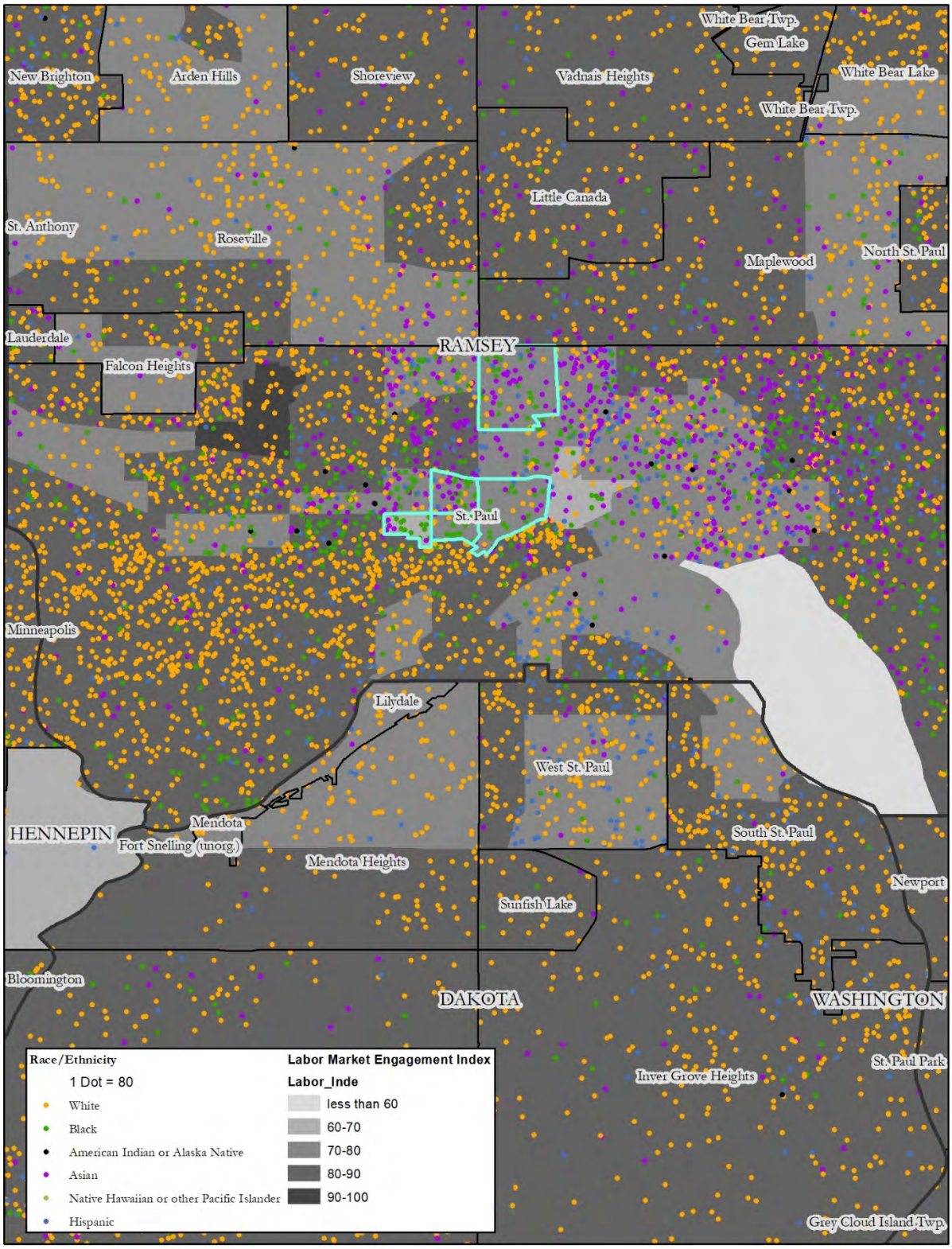
Map 19: Ramsey County, Race, Labor Market Index



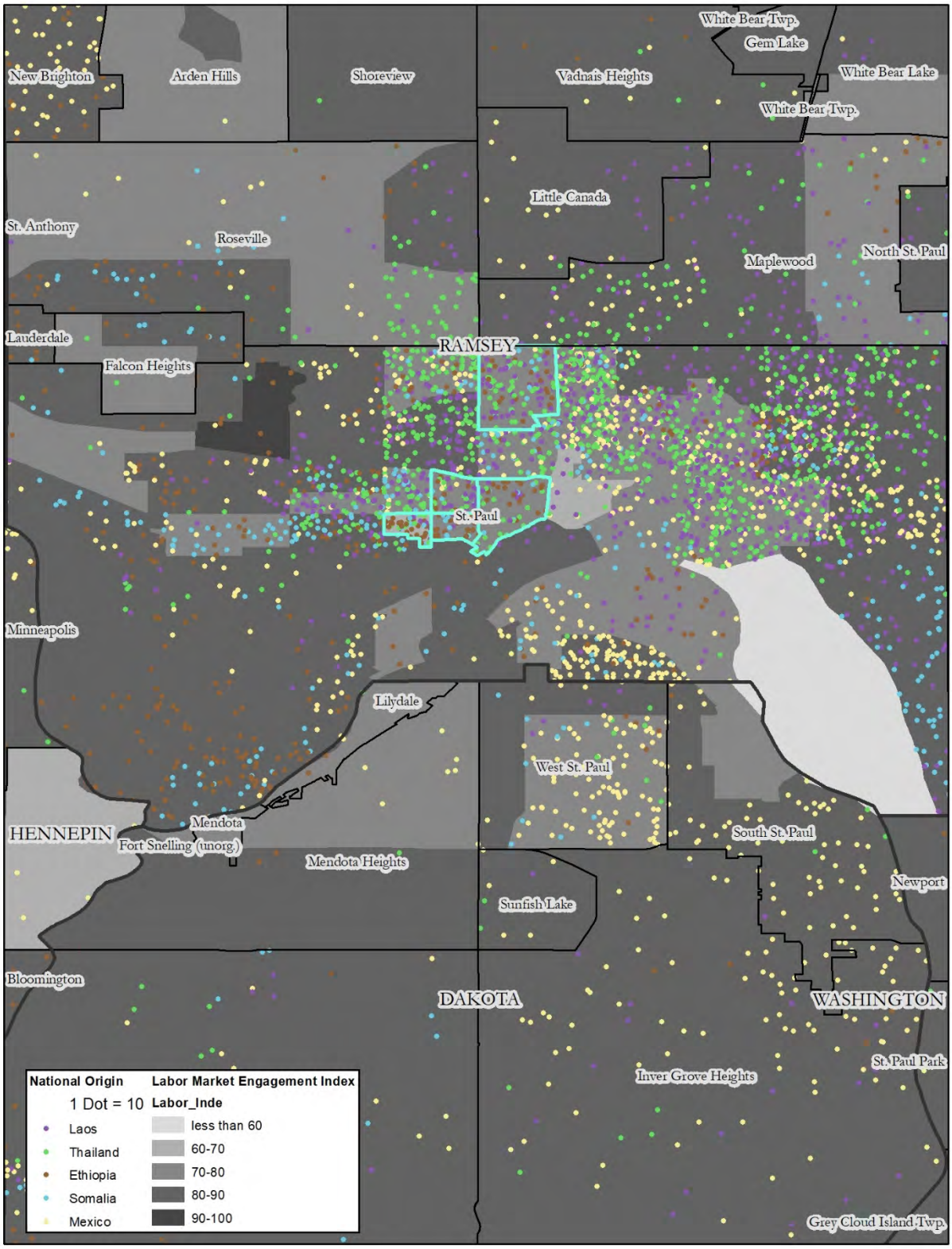
Map 20: Ramsey County, National Origin, Labor Market Index



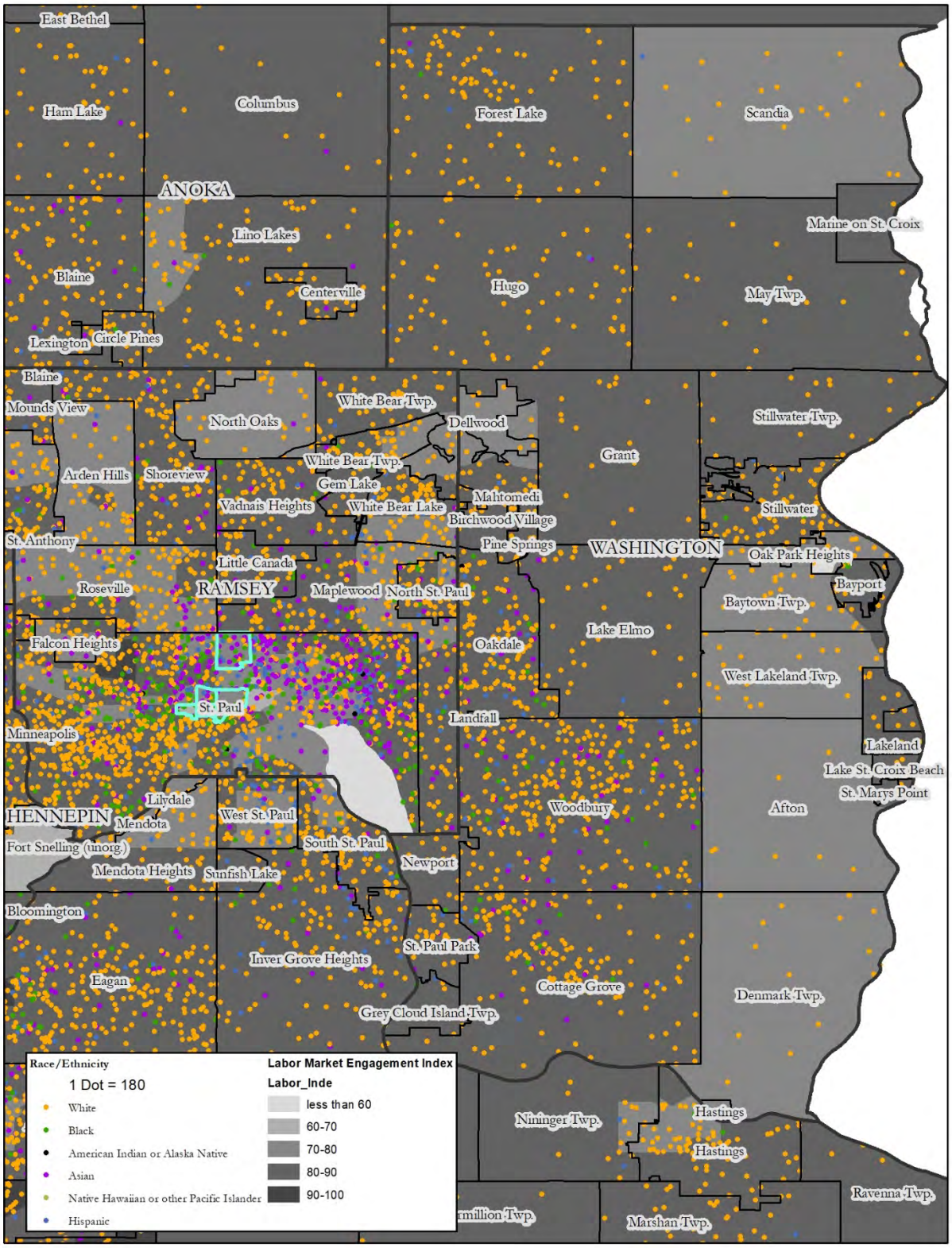
Map 21: St. Paul, Race, Labor Market Index



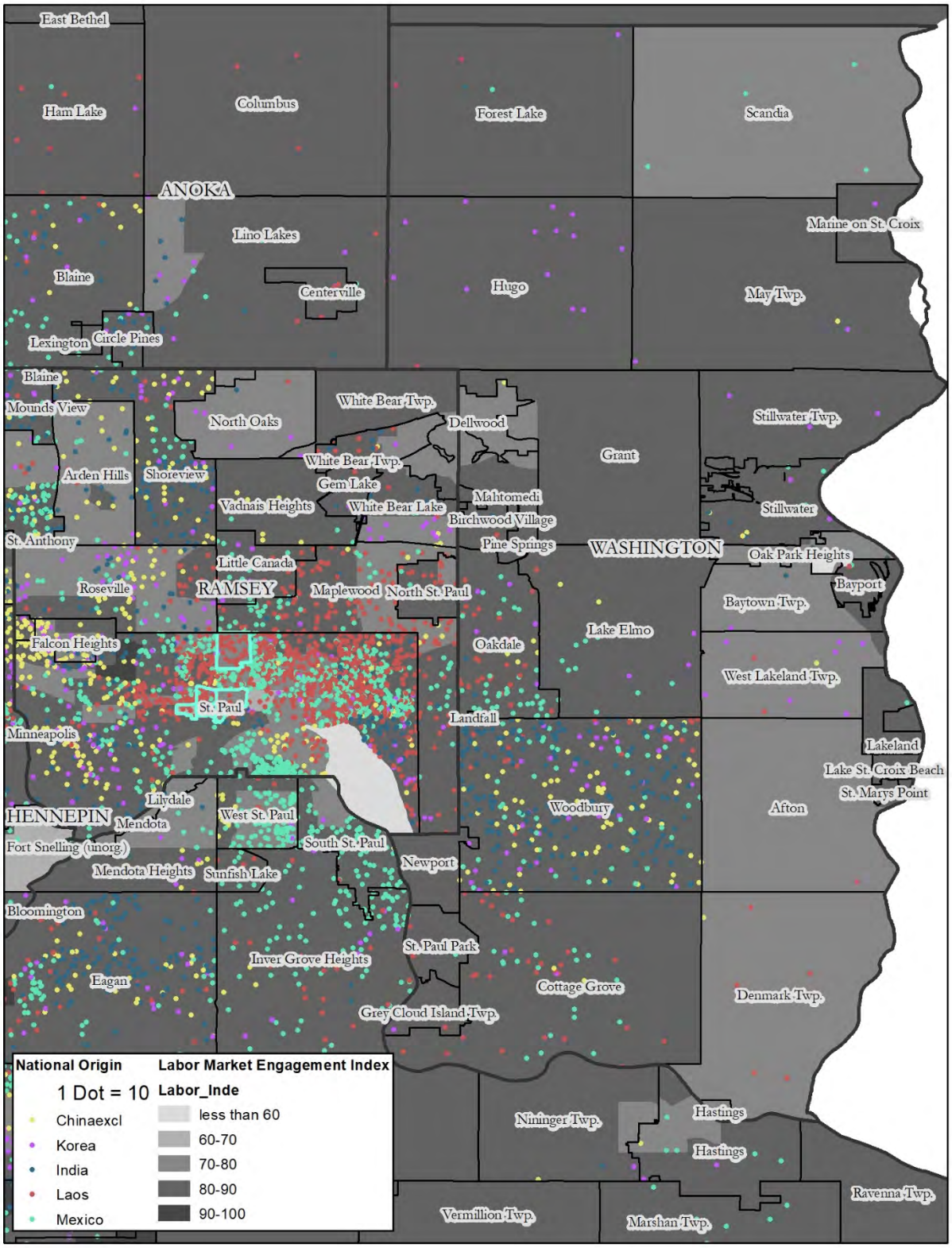
Map 22: St. Paul, National Origin, Labor Market Index



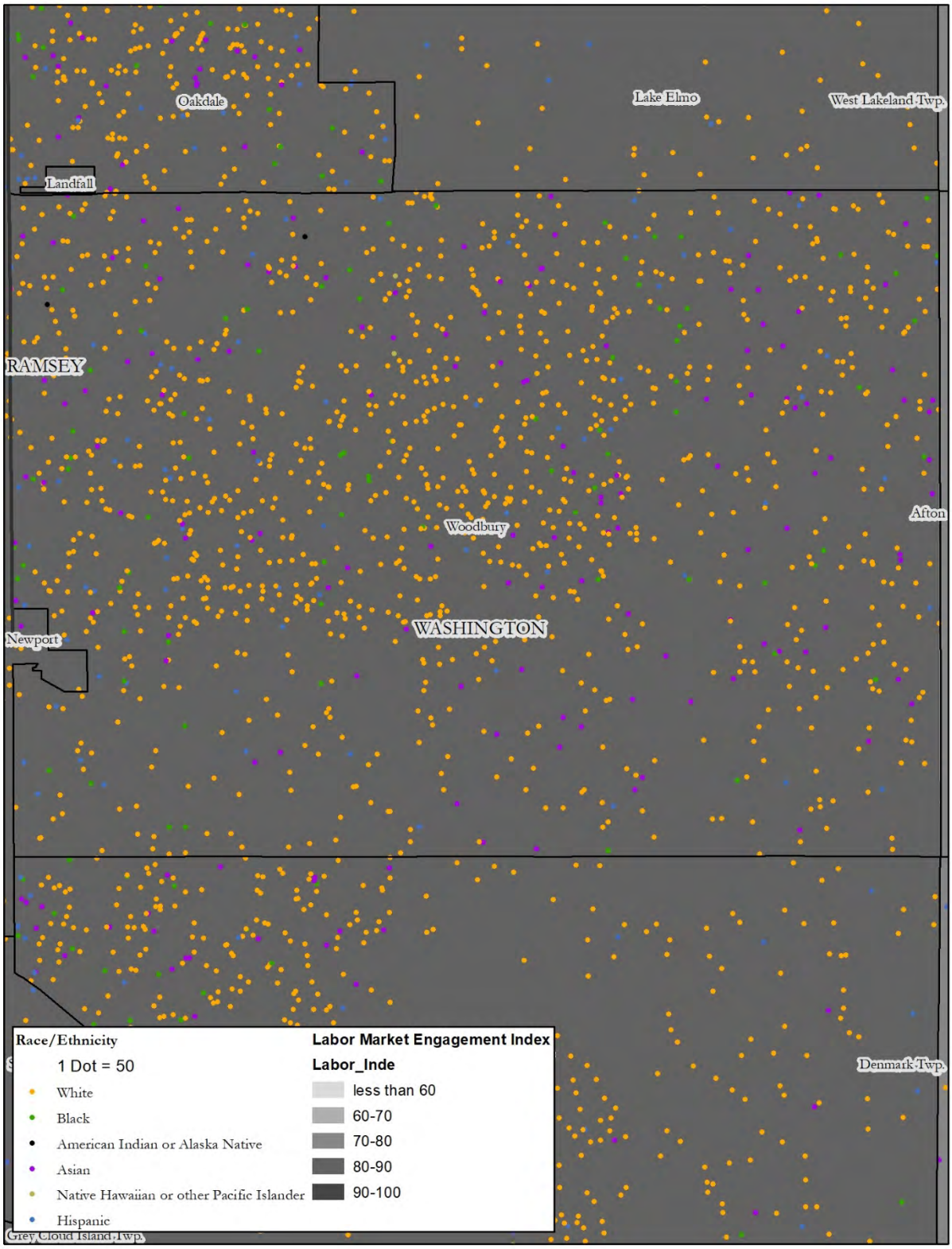
Map 23: Washington County, Race, Labor Market Index



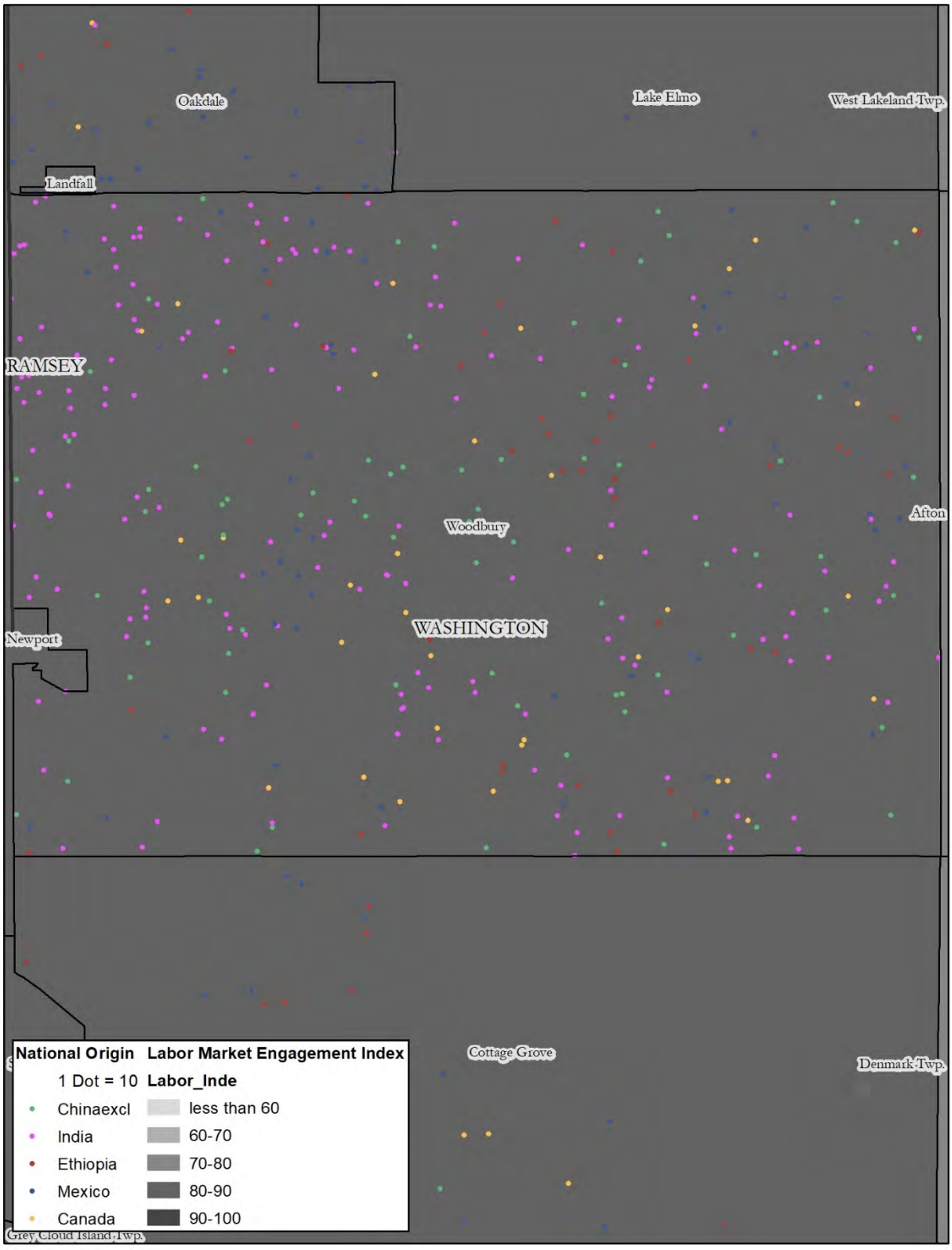
Map 24: Washington County, National Origin, Labor Market Index



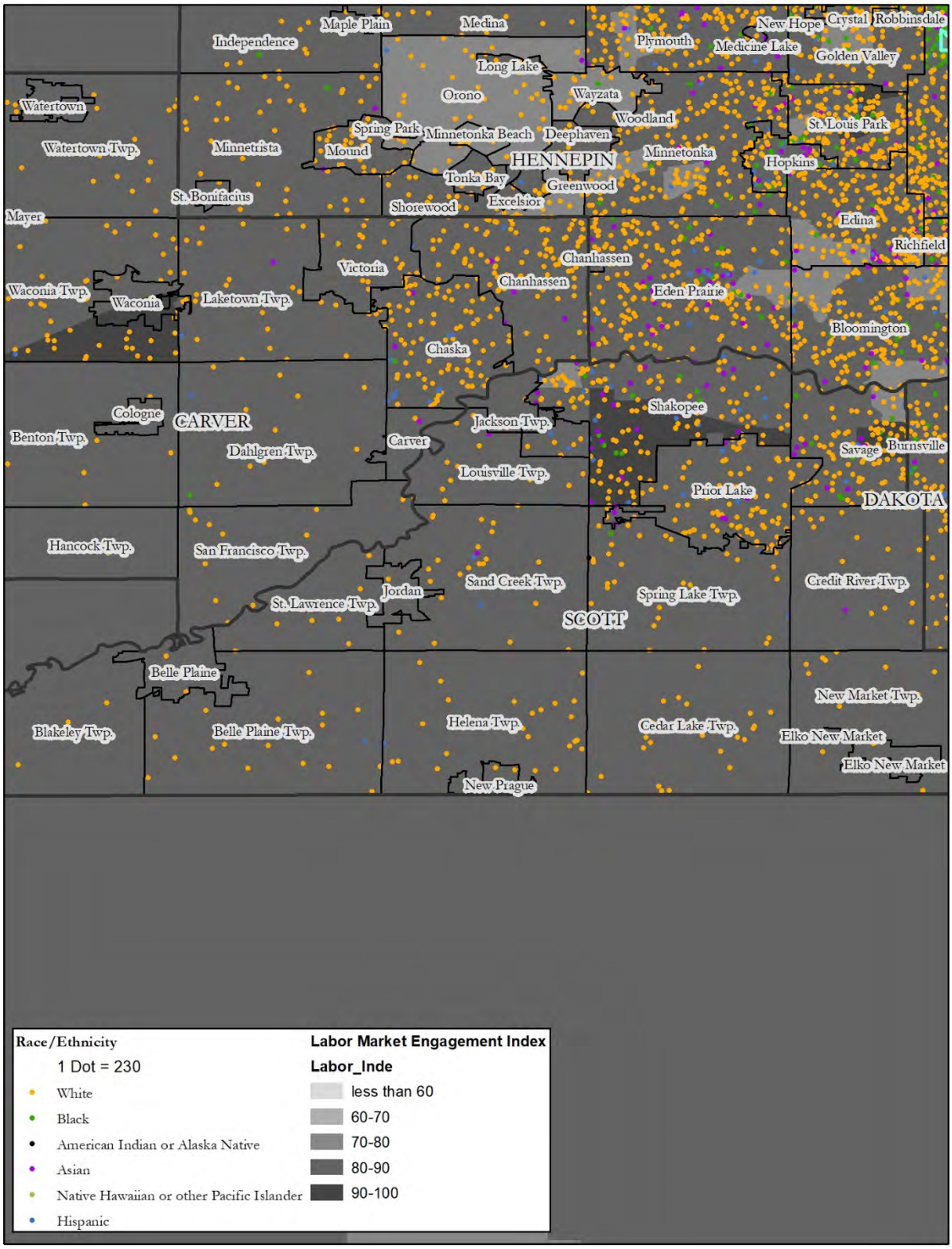
Map 25: Woodbury, Race, Labor Market Index



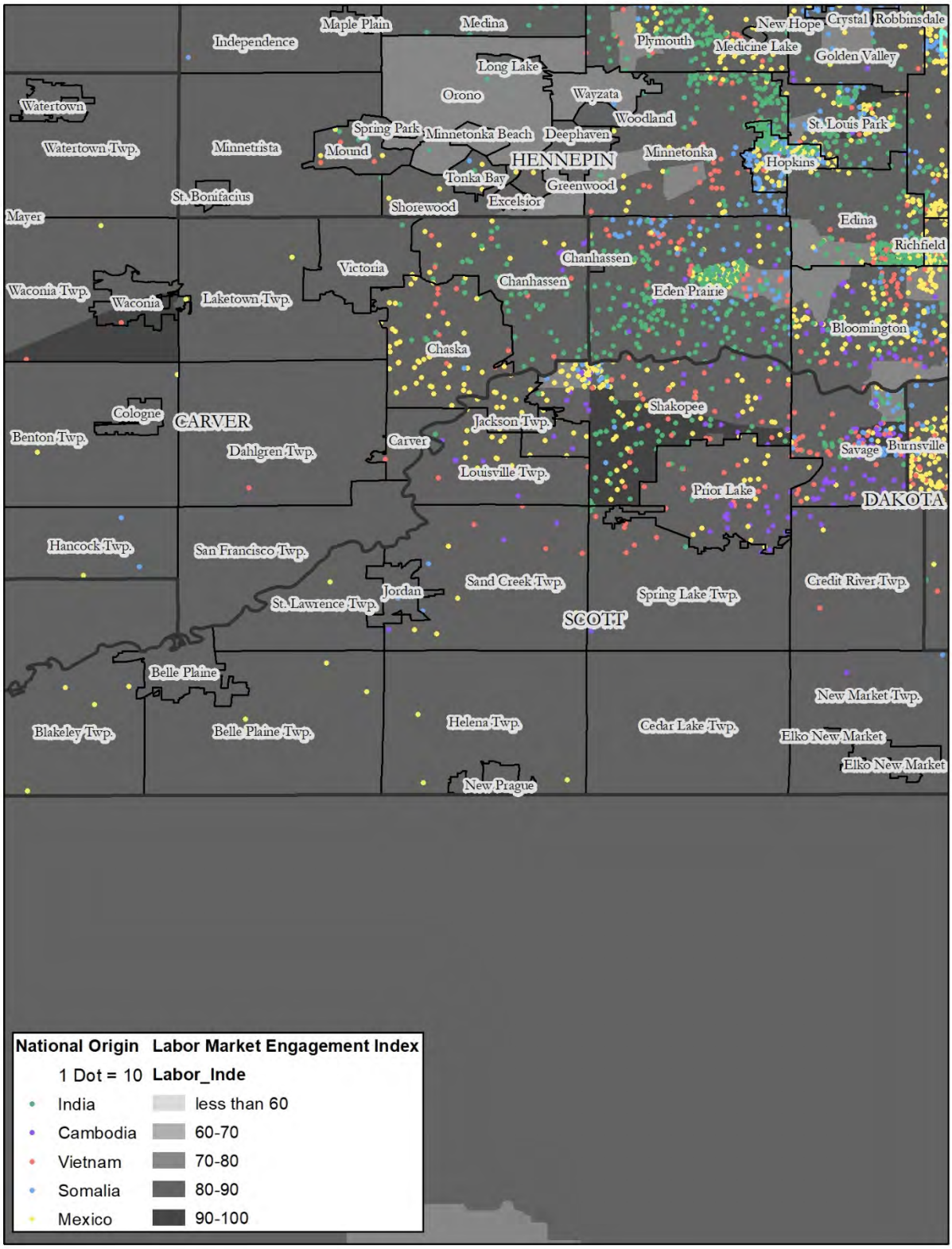
Map 26: Woodbury, National Origin, Labor Market Index



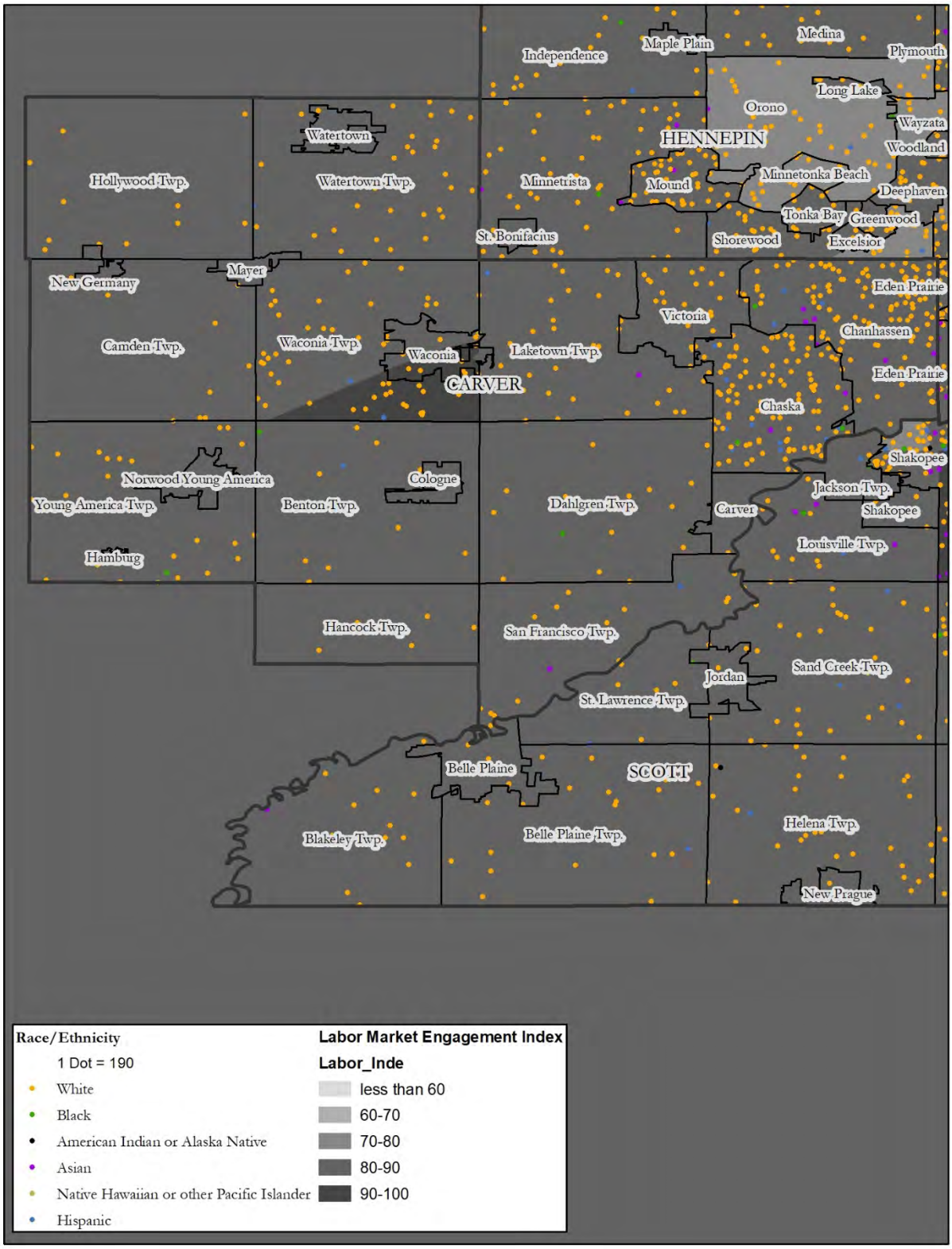
Map 27: Scott County, Race, Labor Market Index



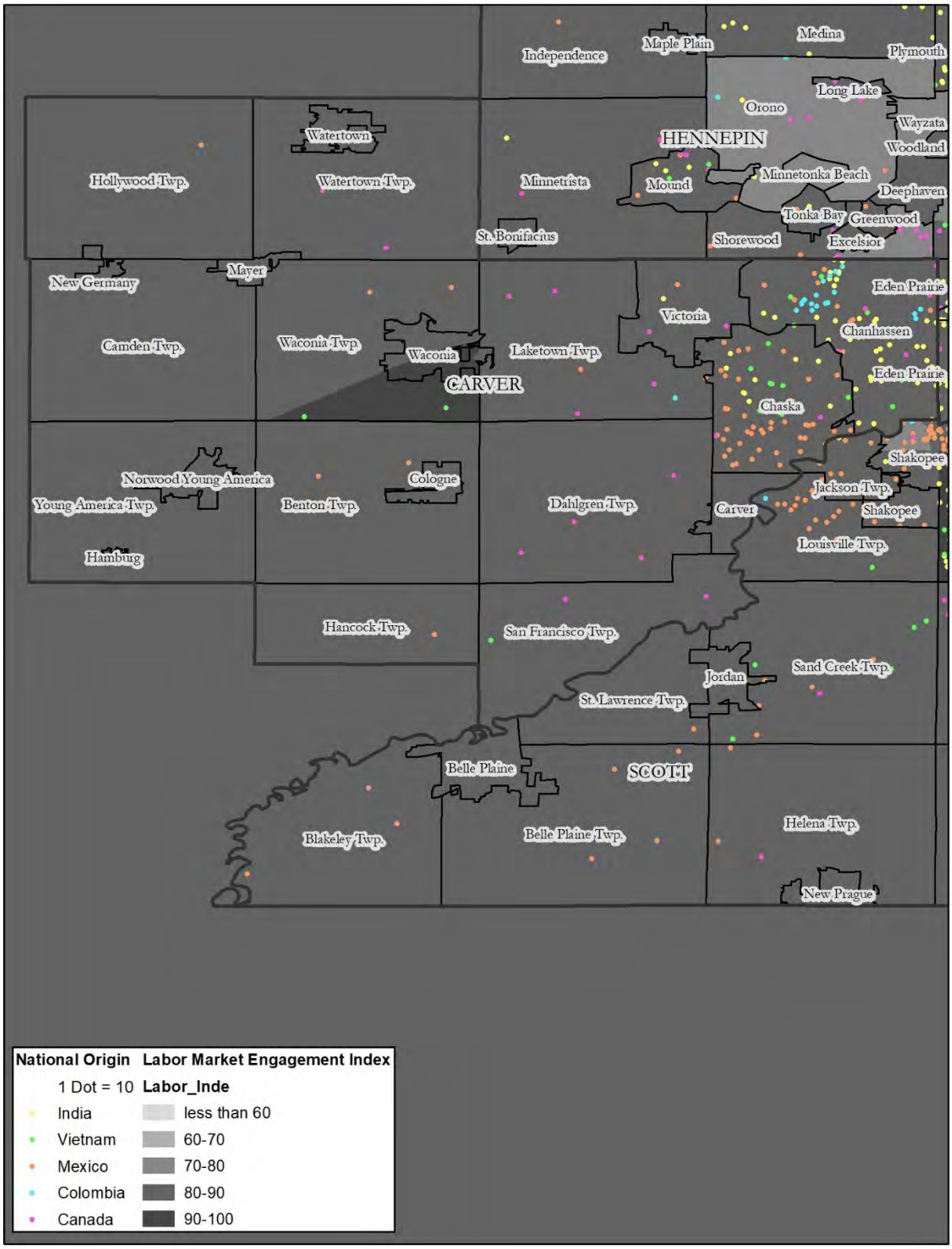
Map 28: Scott County, National Origin, Labor Market Index



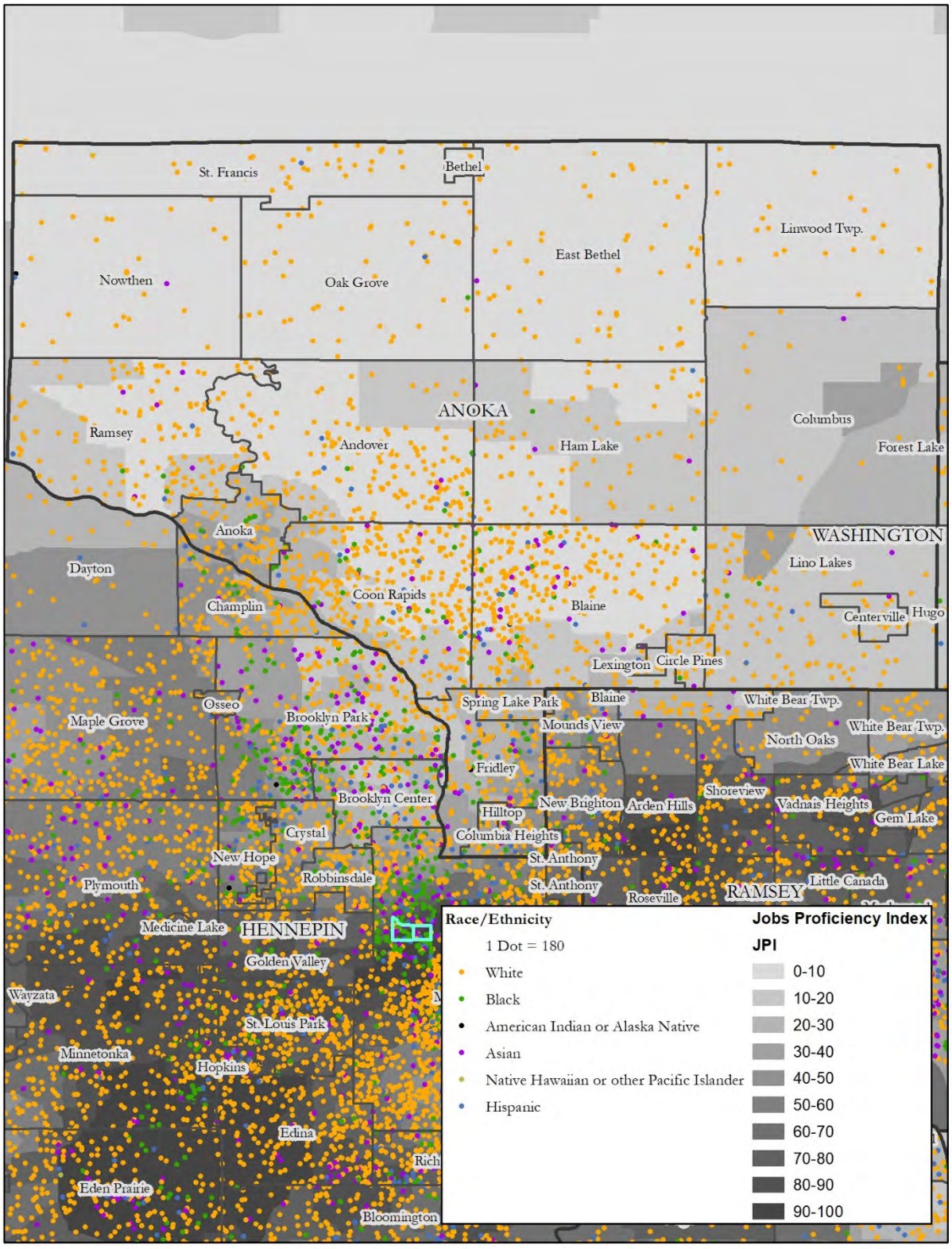
Map 29: Carver County, Race, Labor Market Index



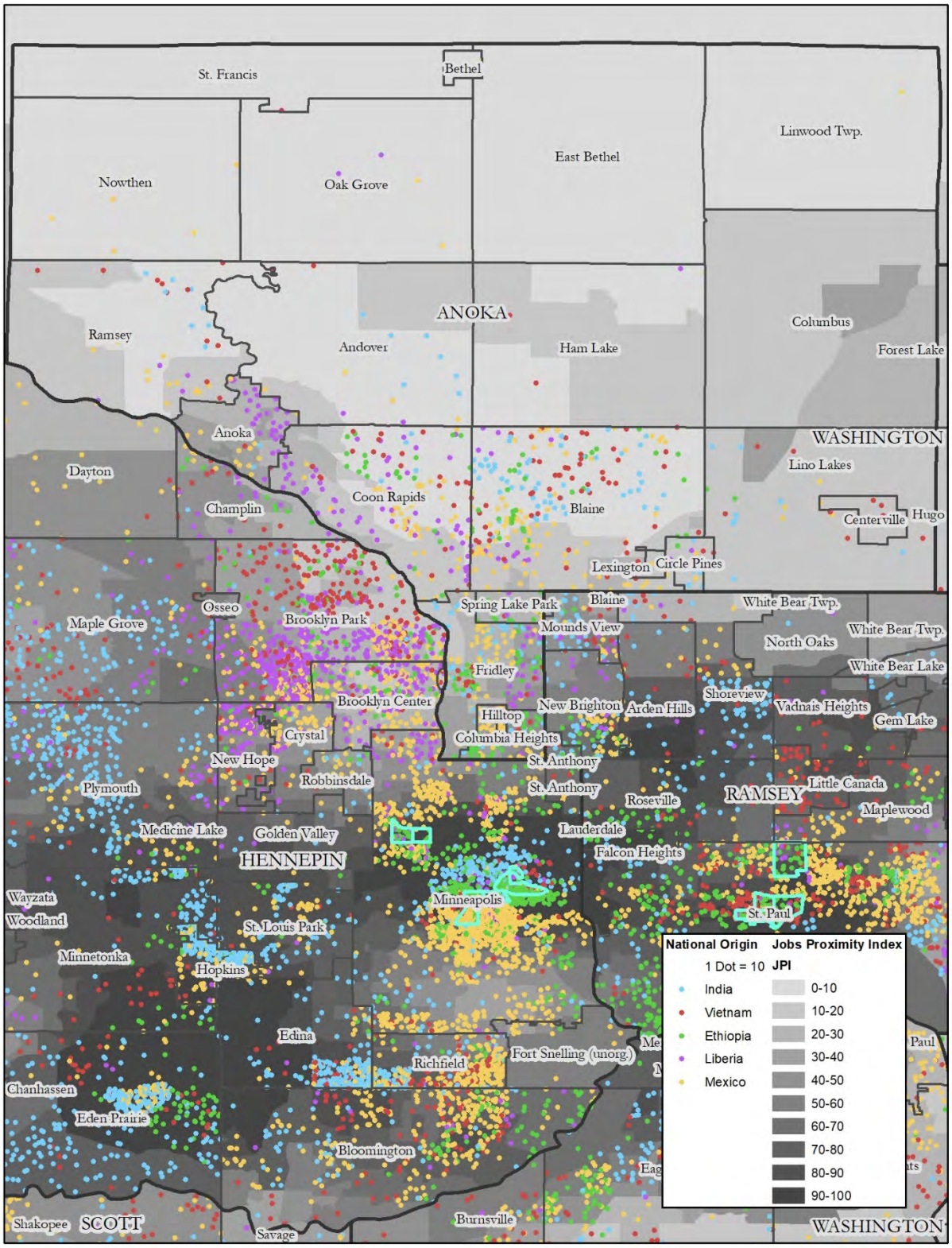
Map 30: Carver County, National Origin, Labor Market Index



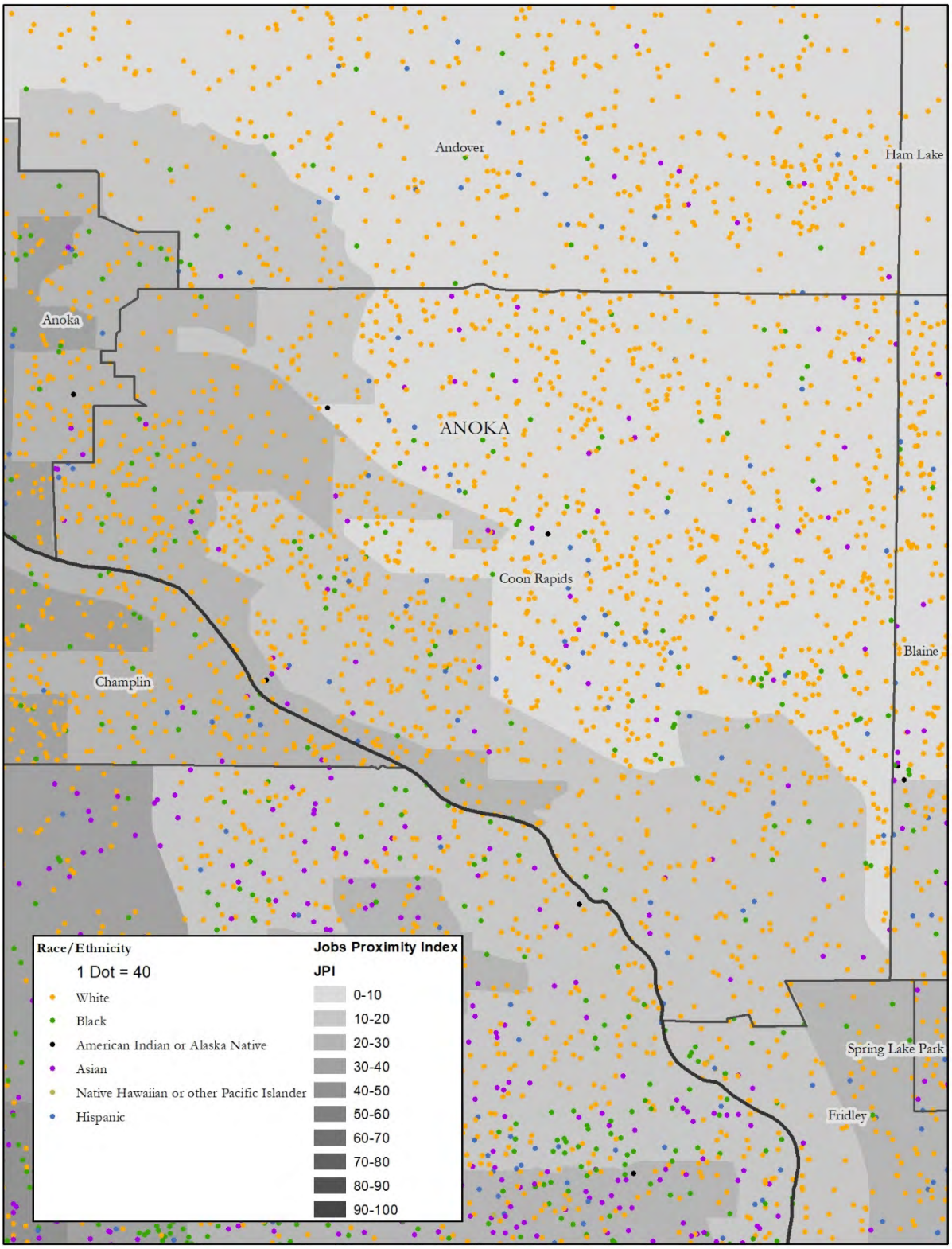
Map 31: Anoka County, Race, Jobs Proximity Index



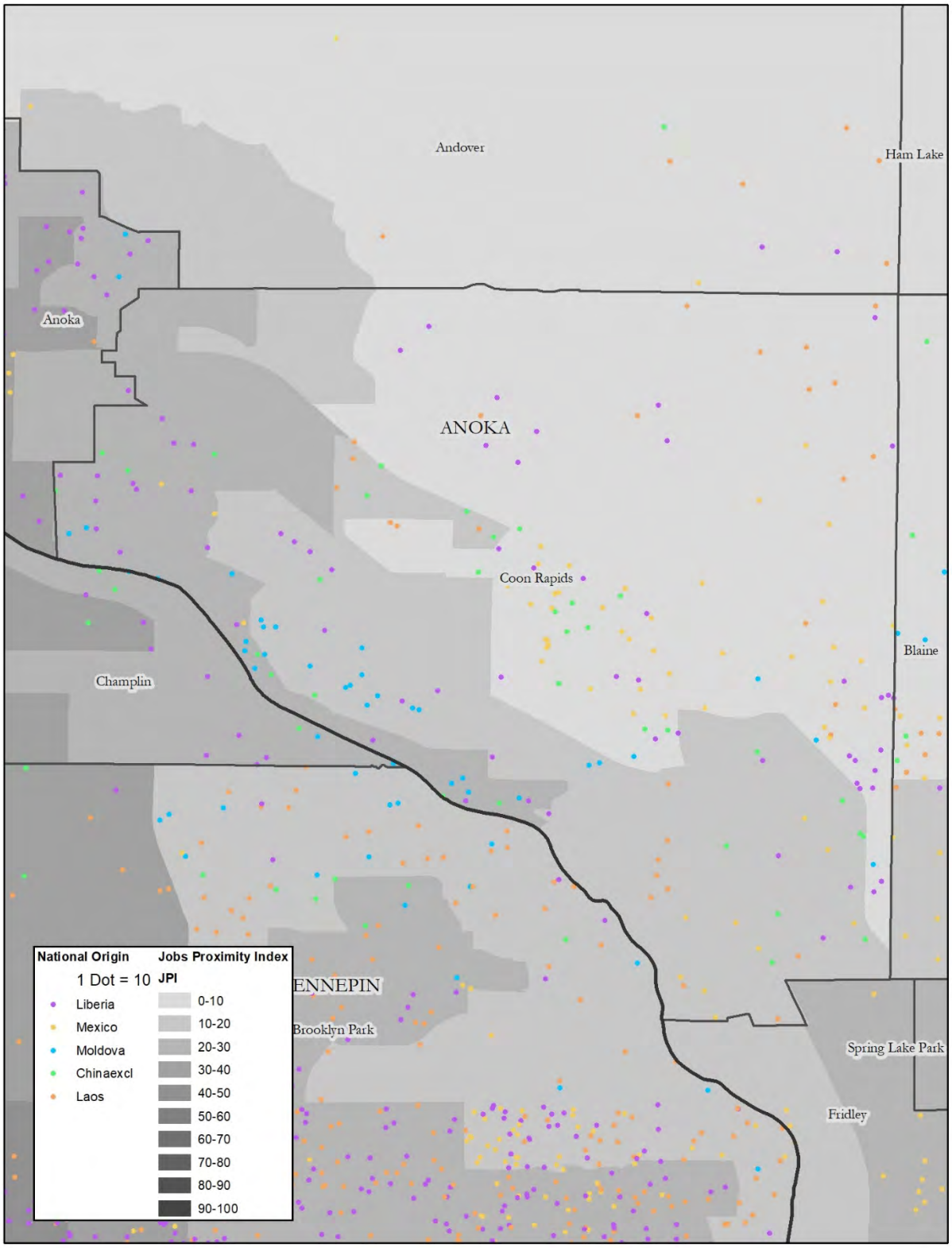
Map 32: Anoka County, National Origin, Jobs Proximity Index



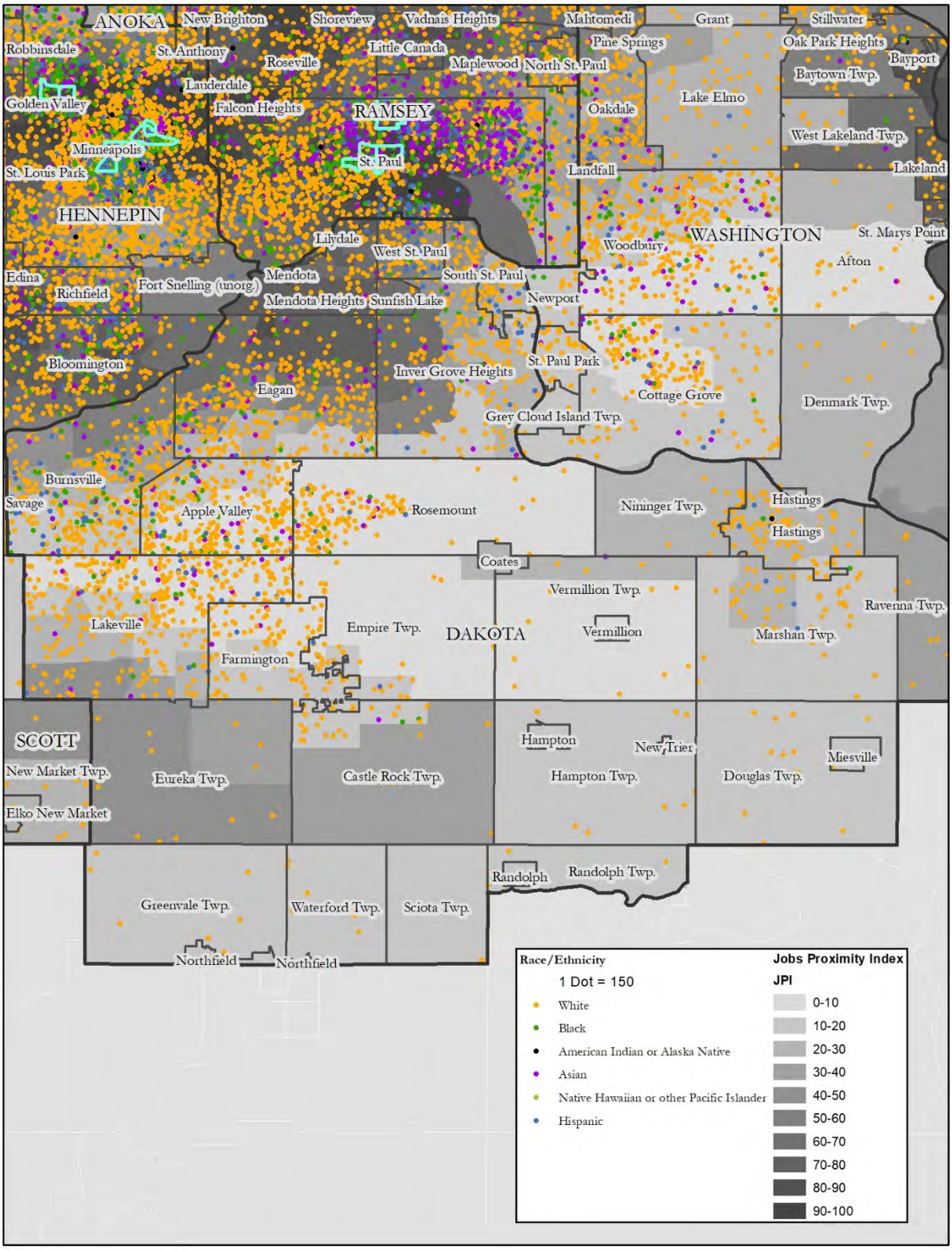
Map 33: Coon Rapids, Race, Jobs Proximity Index



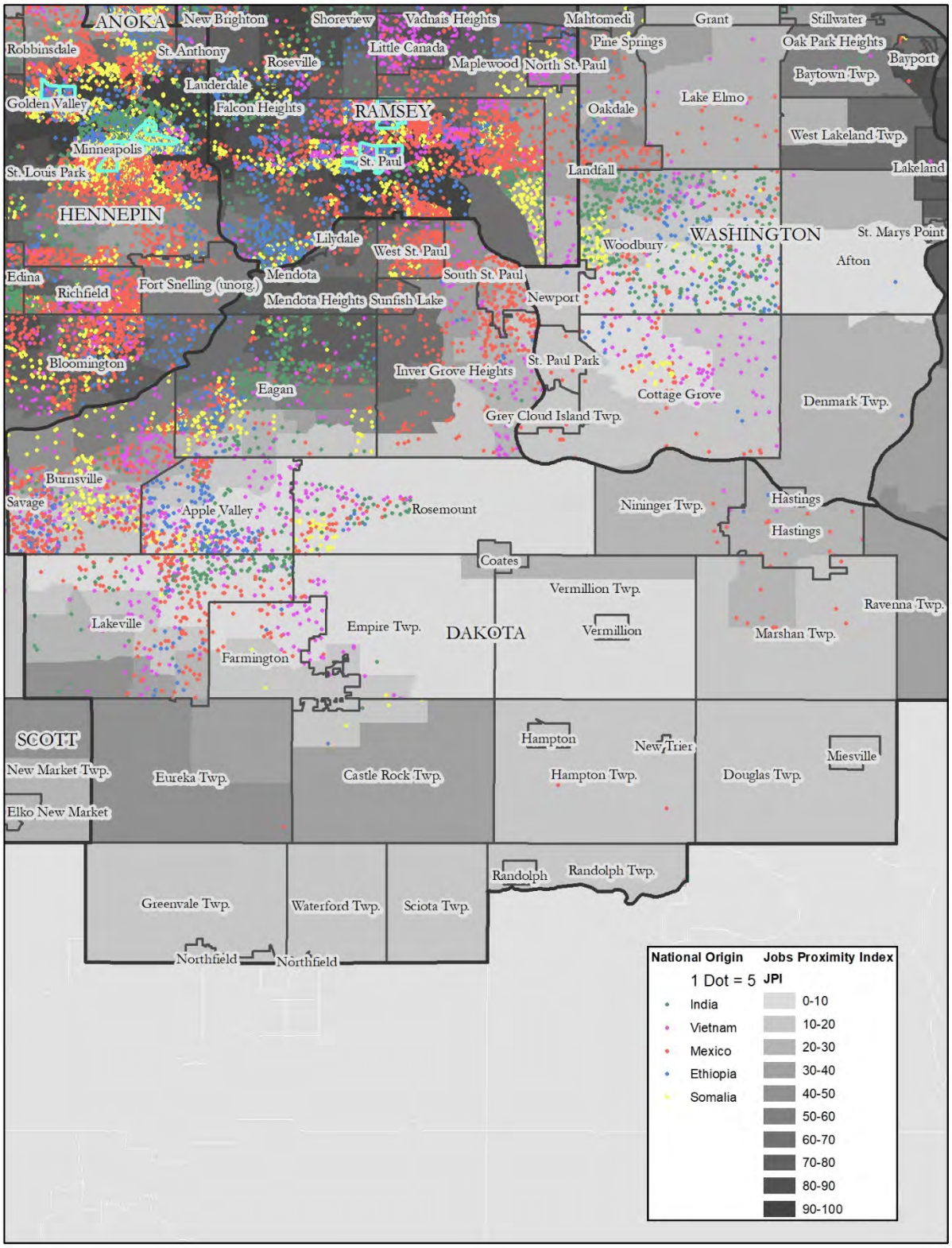
Map 34: Coon Rapids, National Origin, Jobs Proximity Index



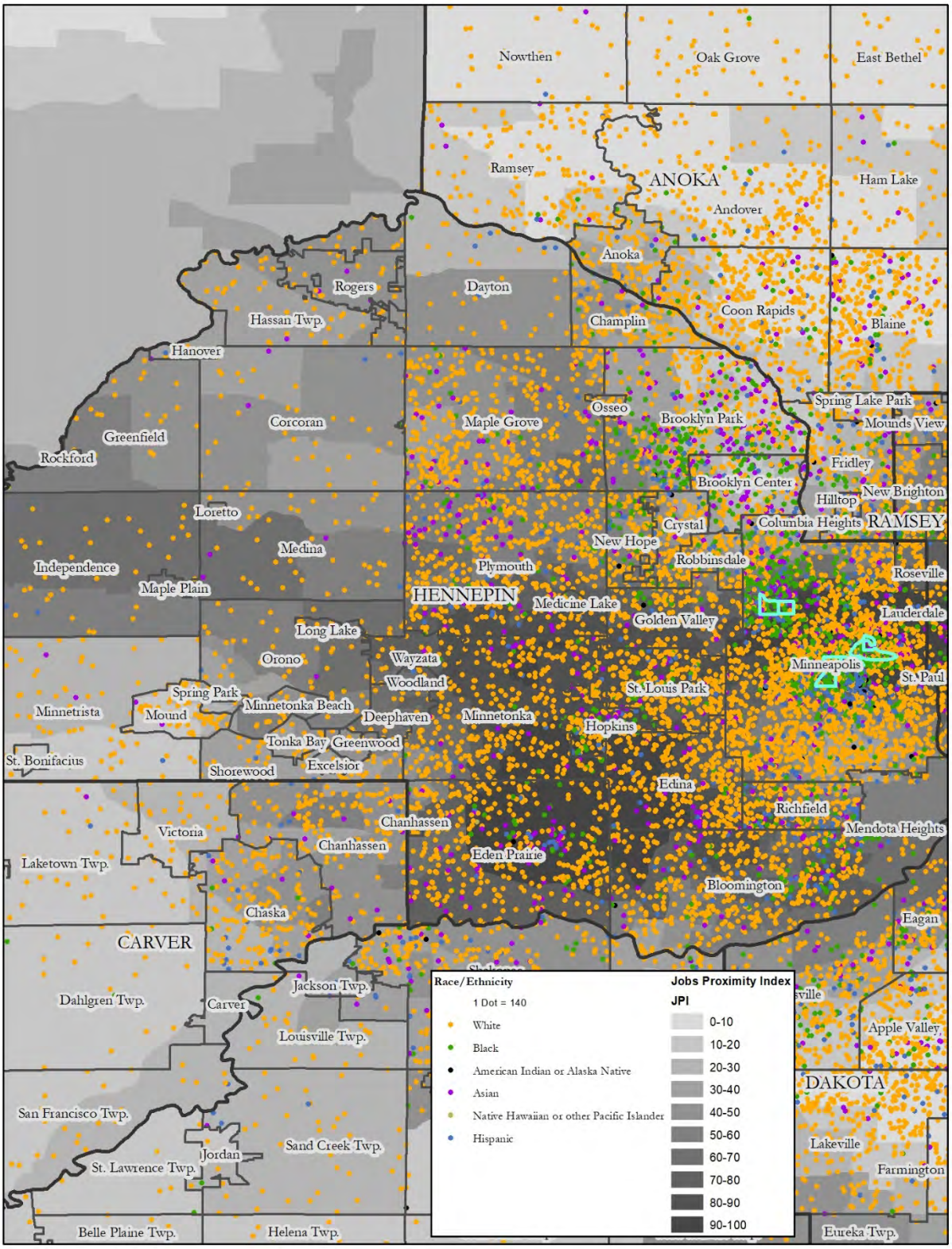
Map 35: Dakota County, Race, Jobs Proximity Index



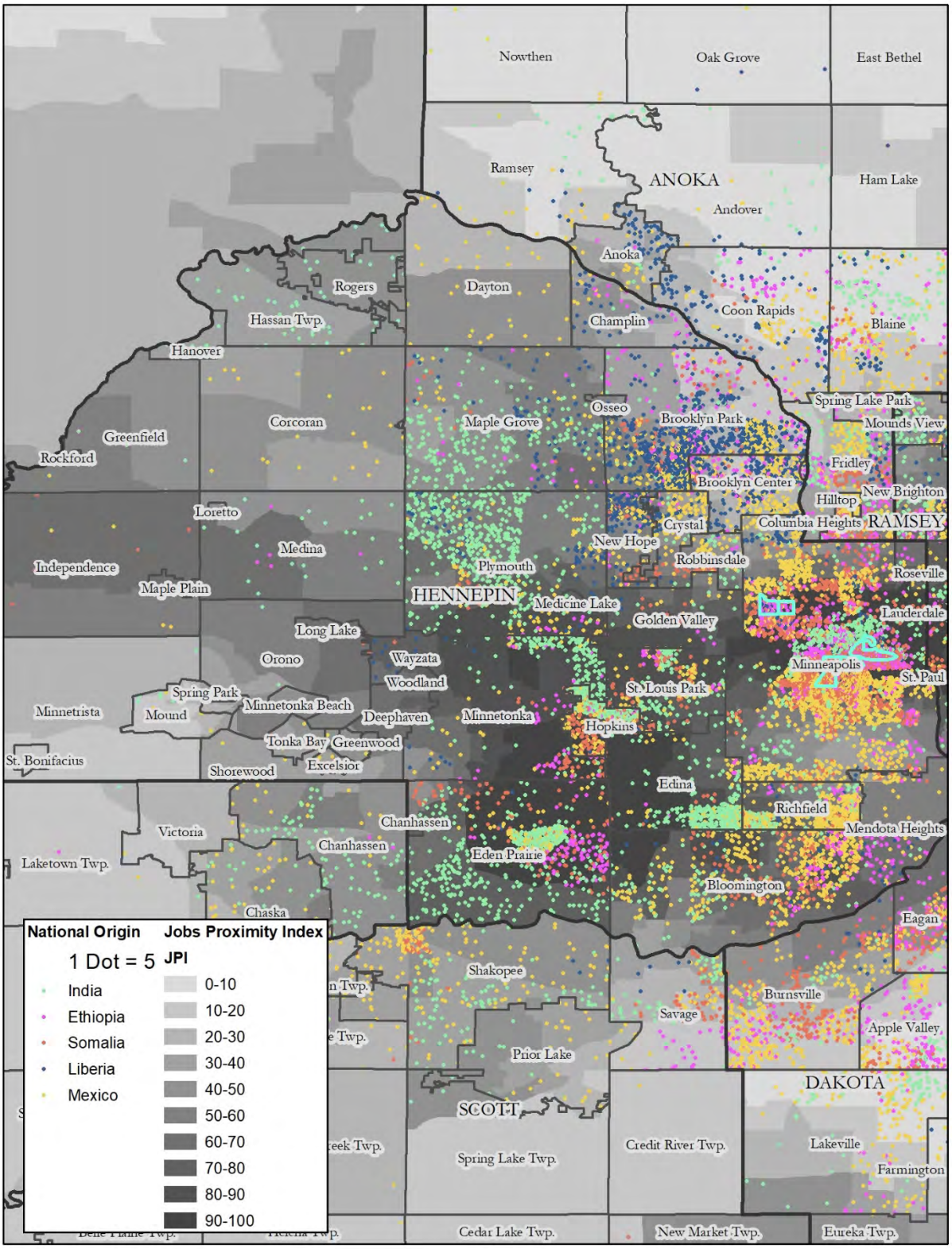
Map 36: Dakota County, National Origin, Jobs Proximity Index



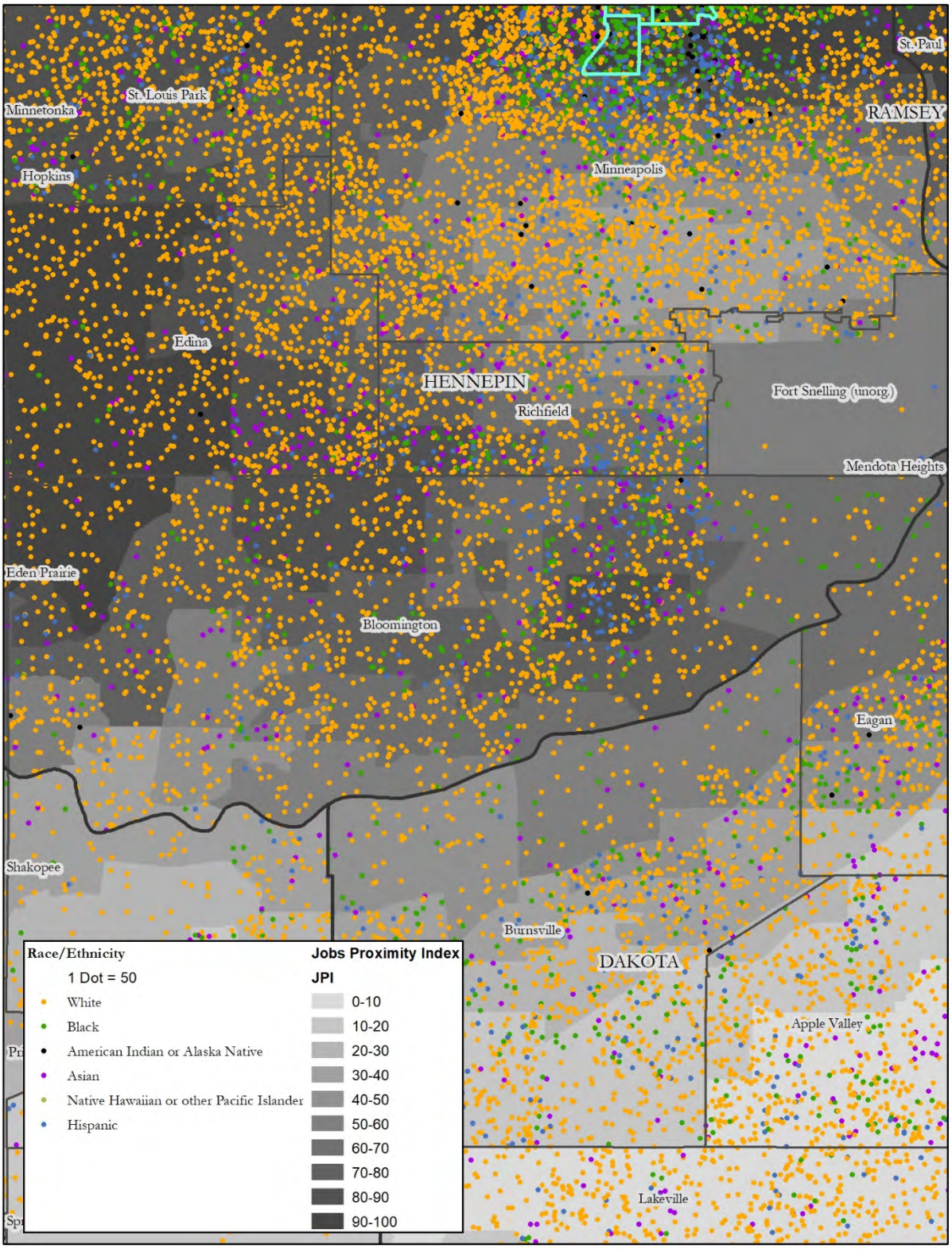
Map 37: Hennepin County, Race, Jobs Proximity Index



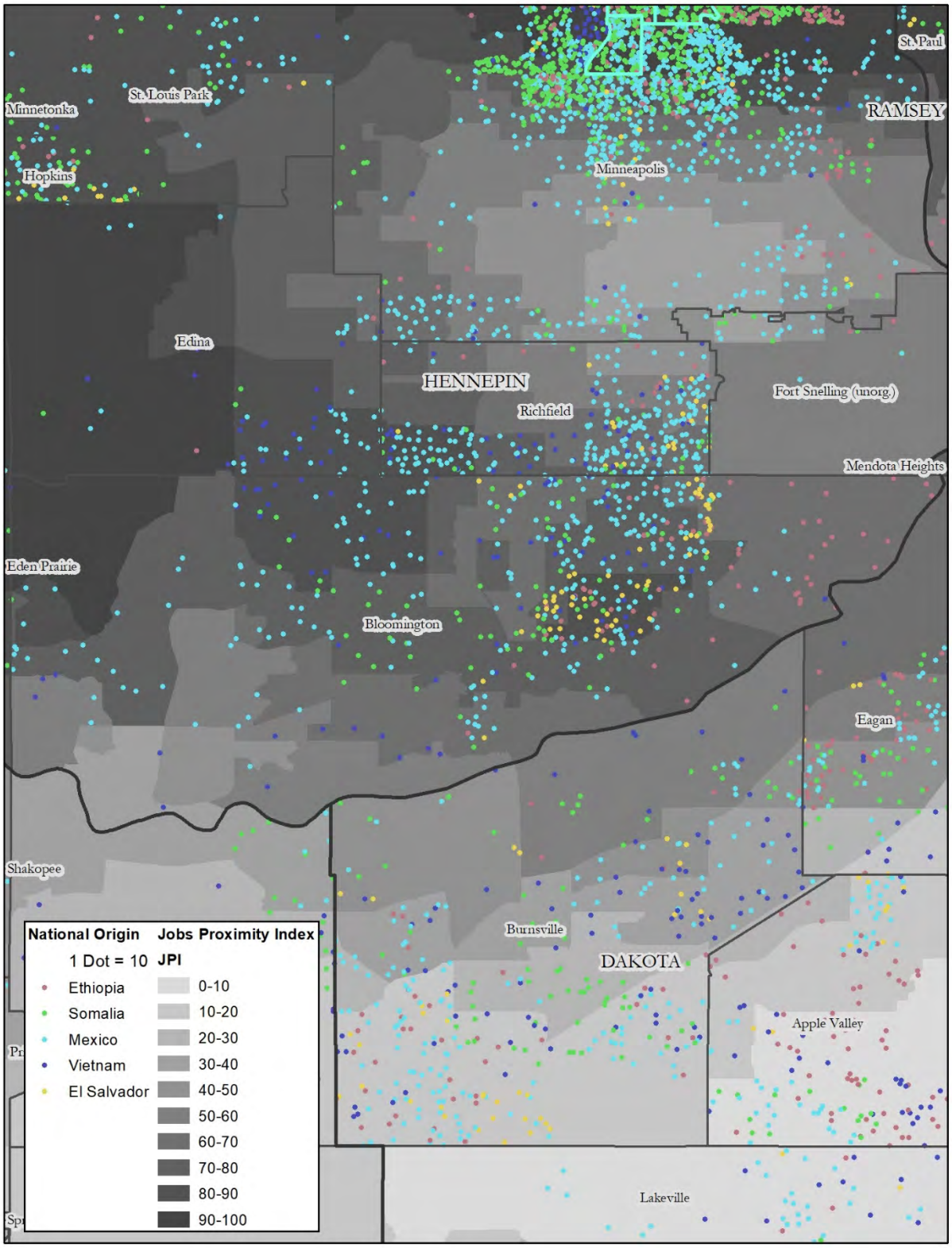
Map 38: Hennepin County, National Origin, Jobs Proximity Index



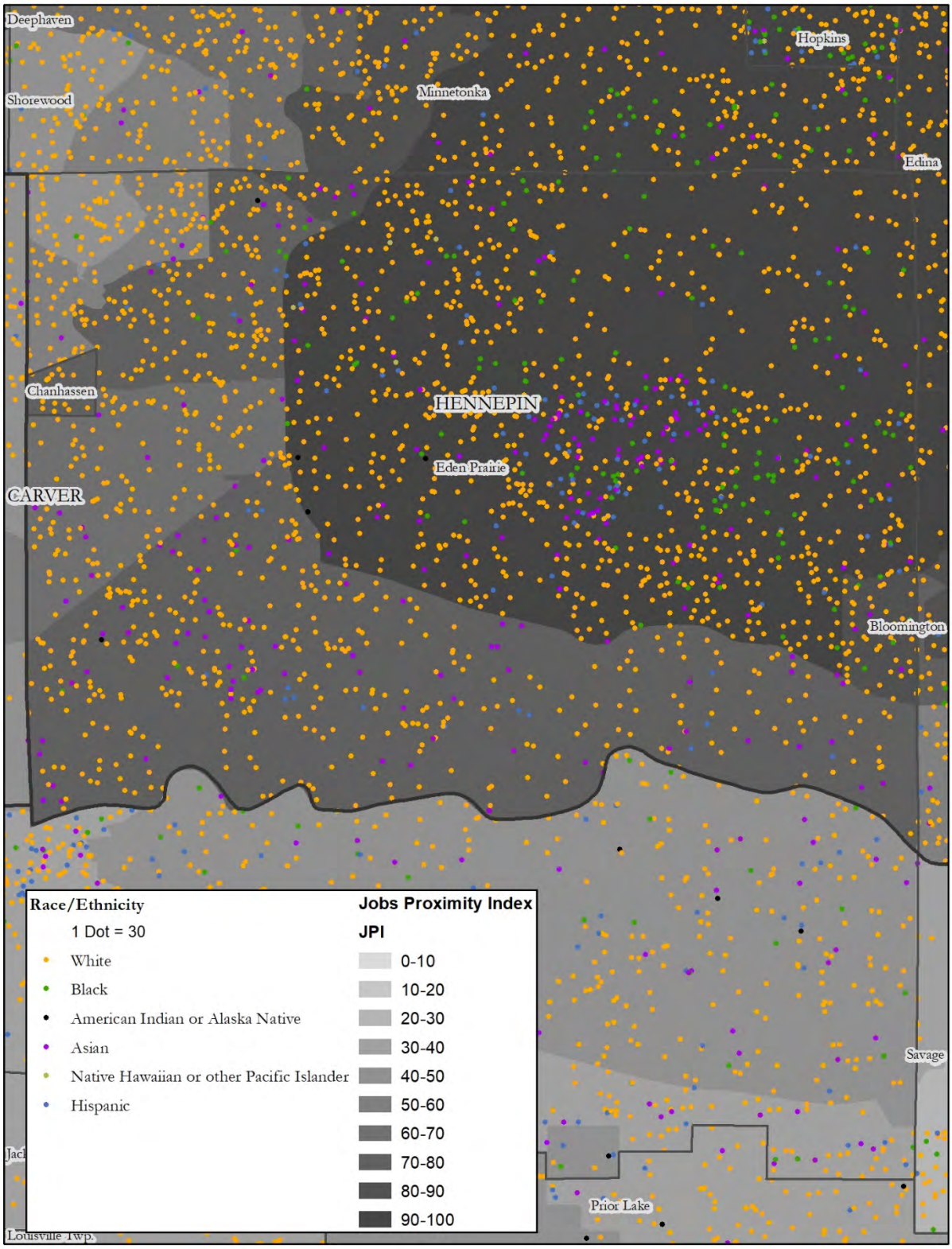
Map 39: Bloomington, Race, Jobs Proximity Index



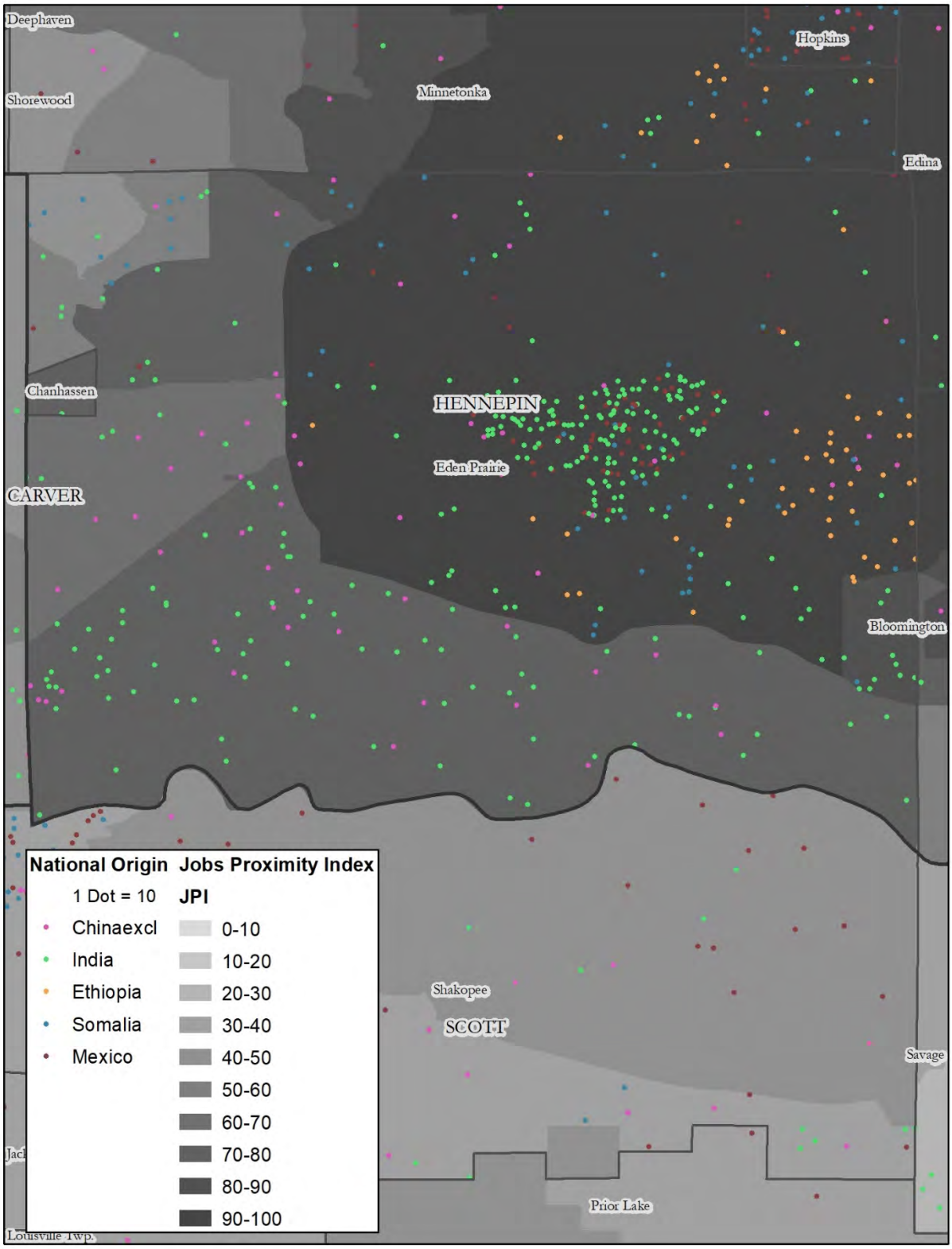
Map 40: Bloomington, National Origin, Jobs Proximity Index



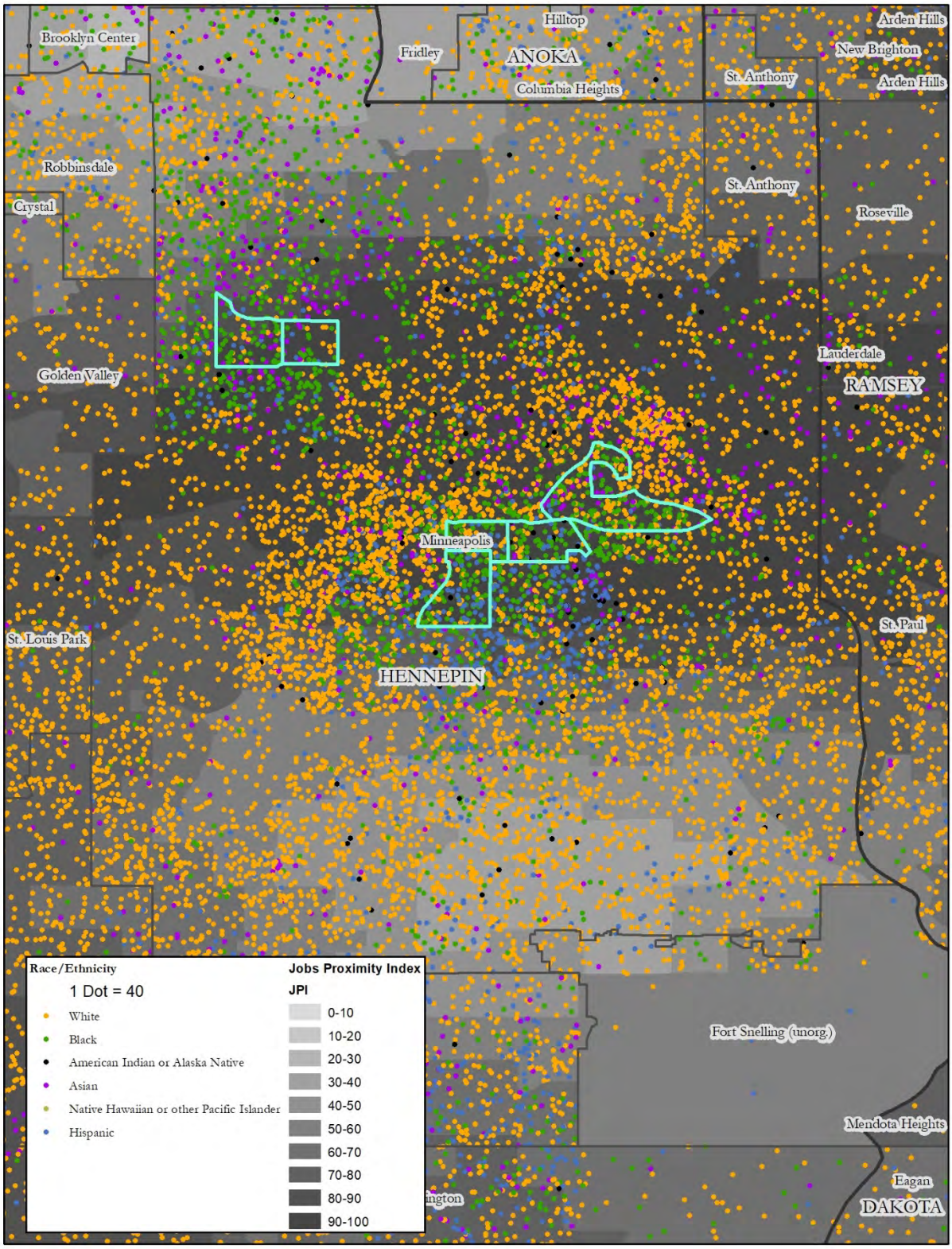
Map 41: Eden Prairie, Race, Jobs Proximity Index



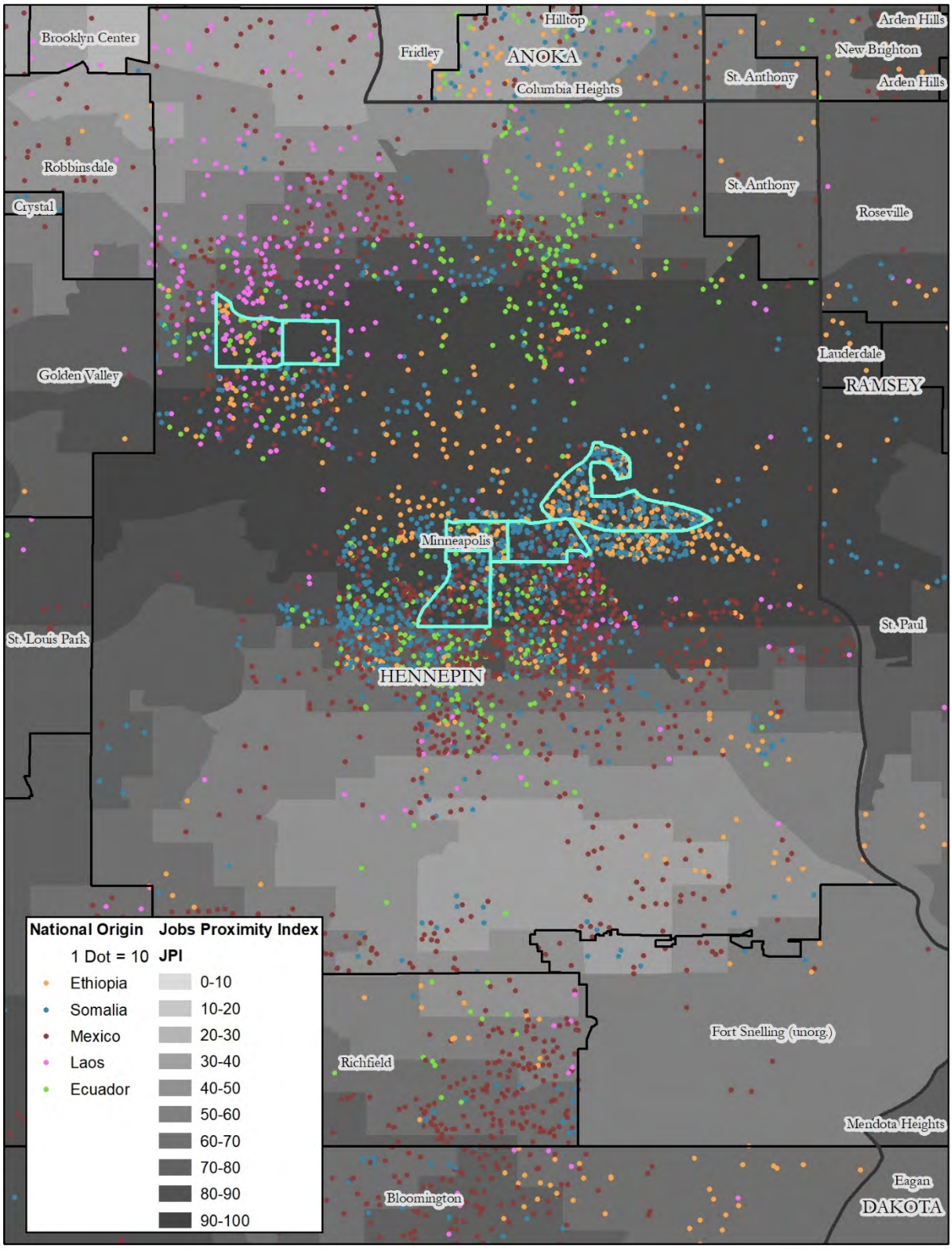
Map 42: Eden Prairie, National Origin, Jobs Proximity Index



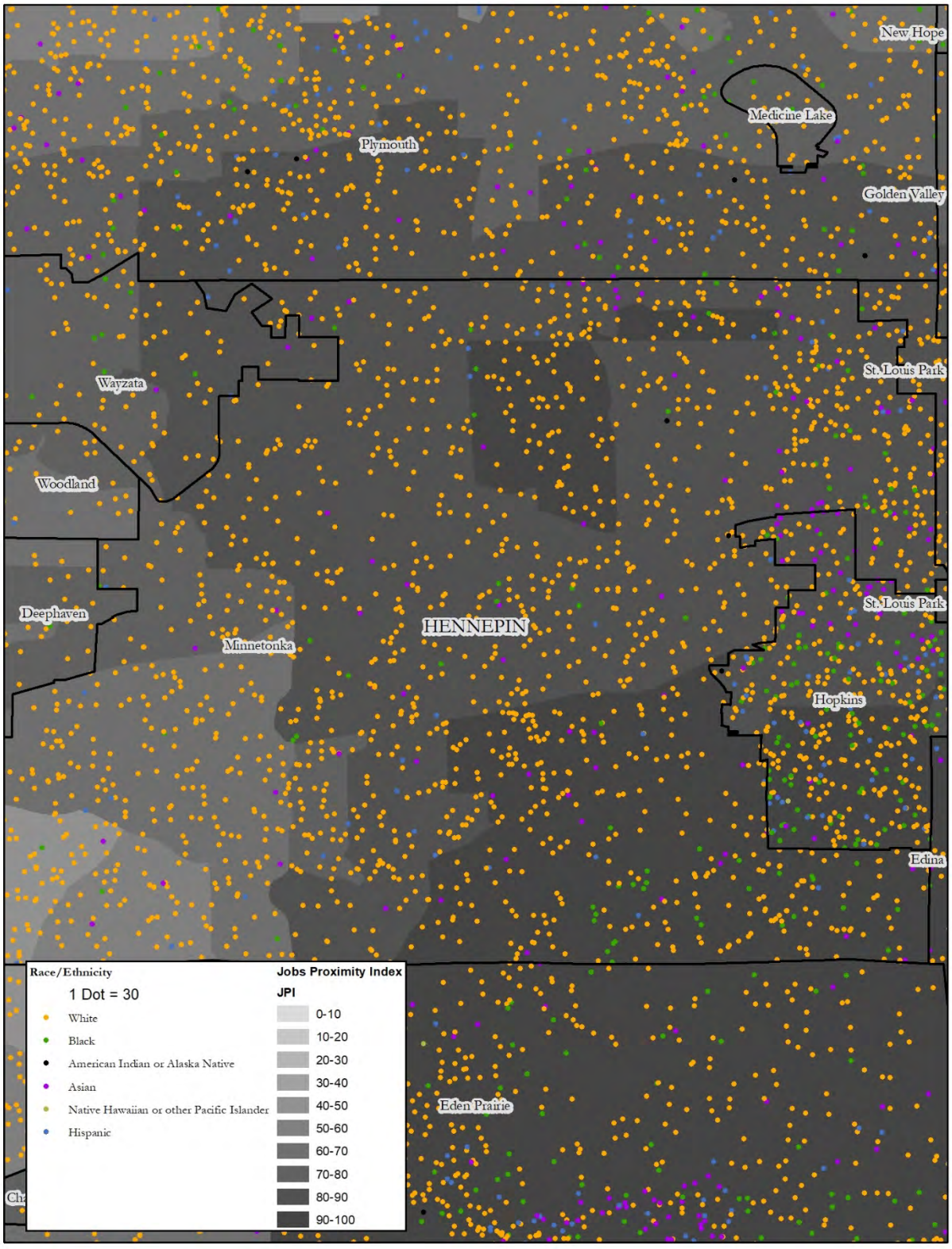
Map 43: Minneapolis, Race, Jobs Proximity Index



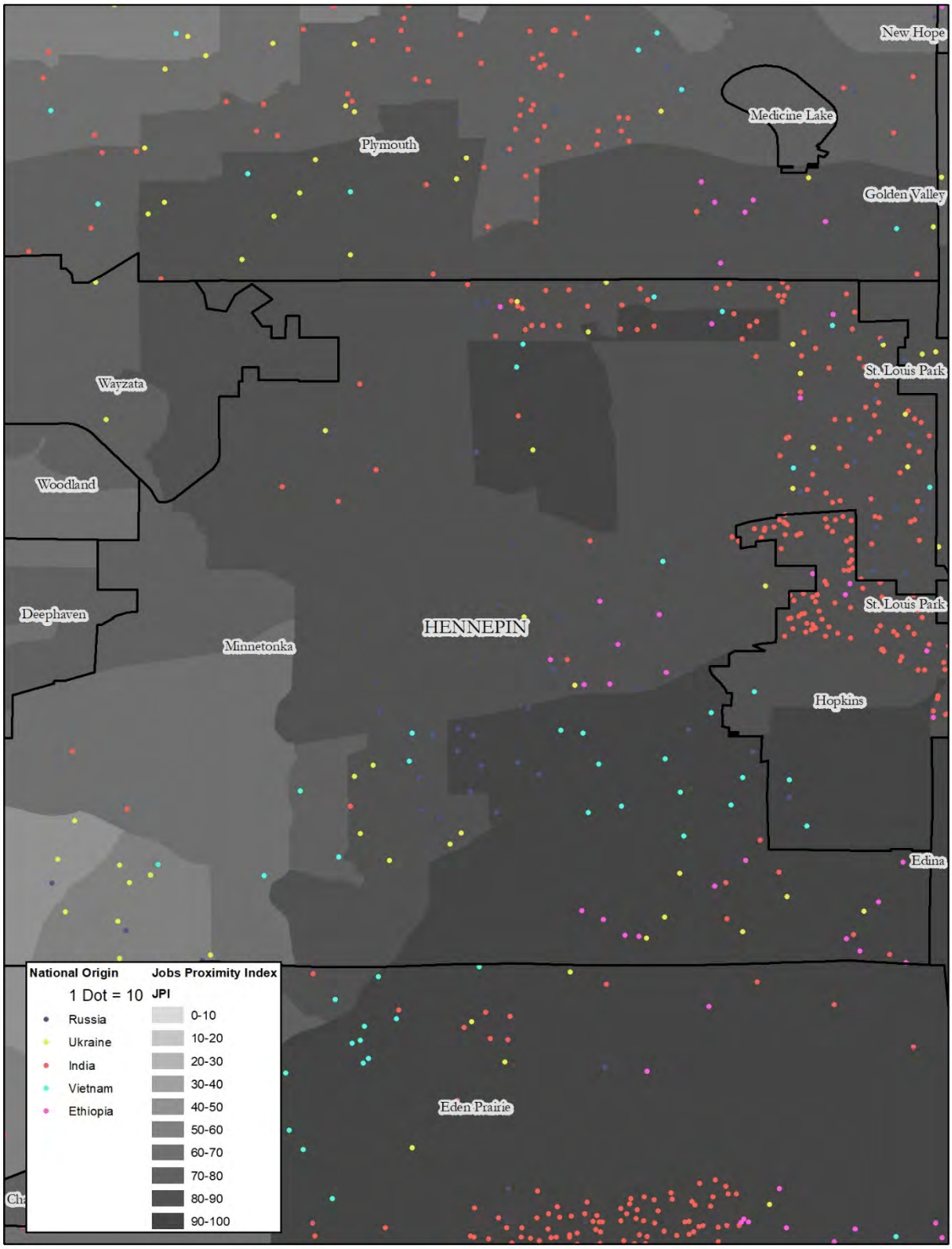
Map 44: Minneapolis, National Origin, Jobs Proximity Index



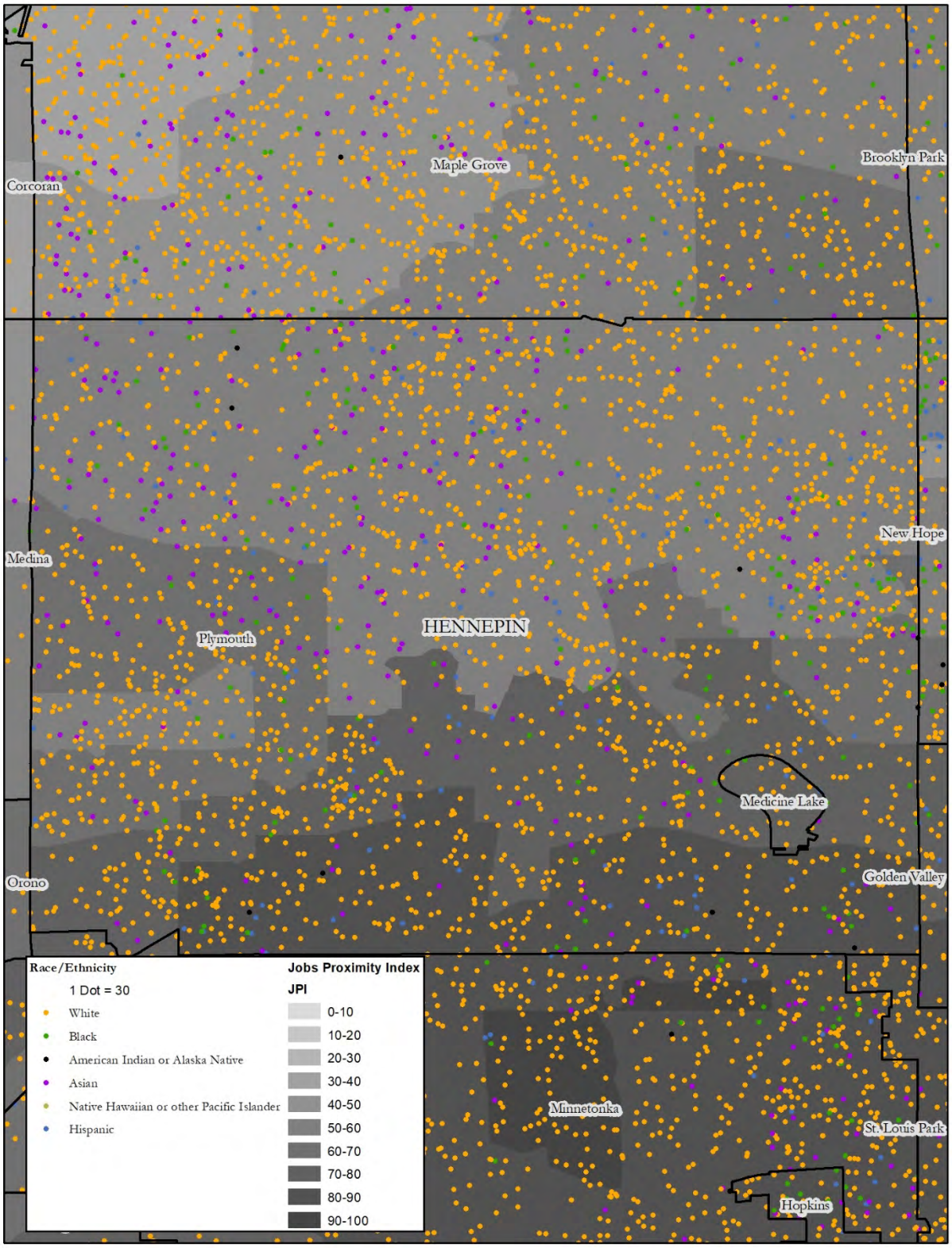
Map 45: Minnetonka, Race, Jobs Proximity Index



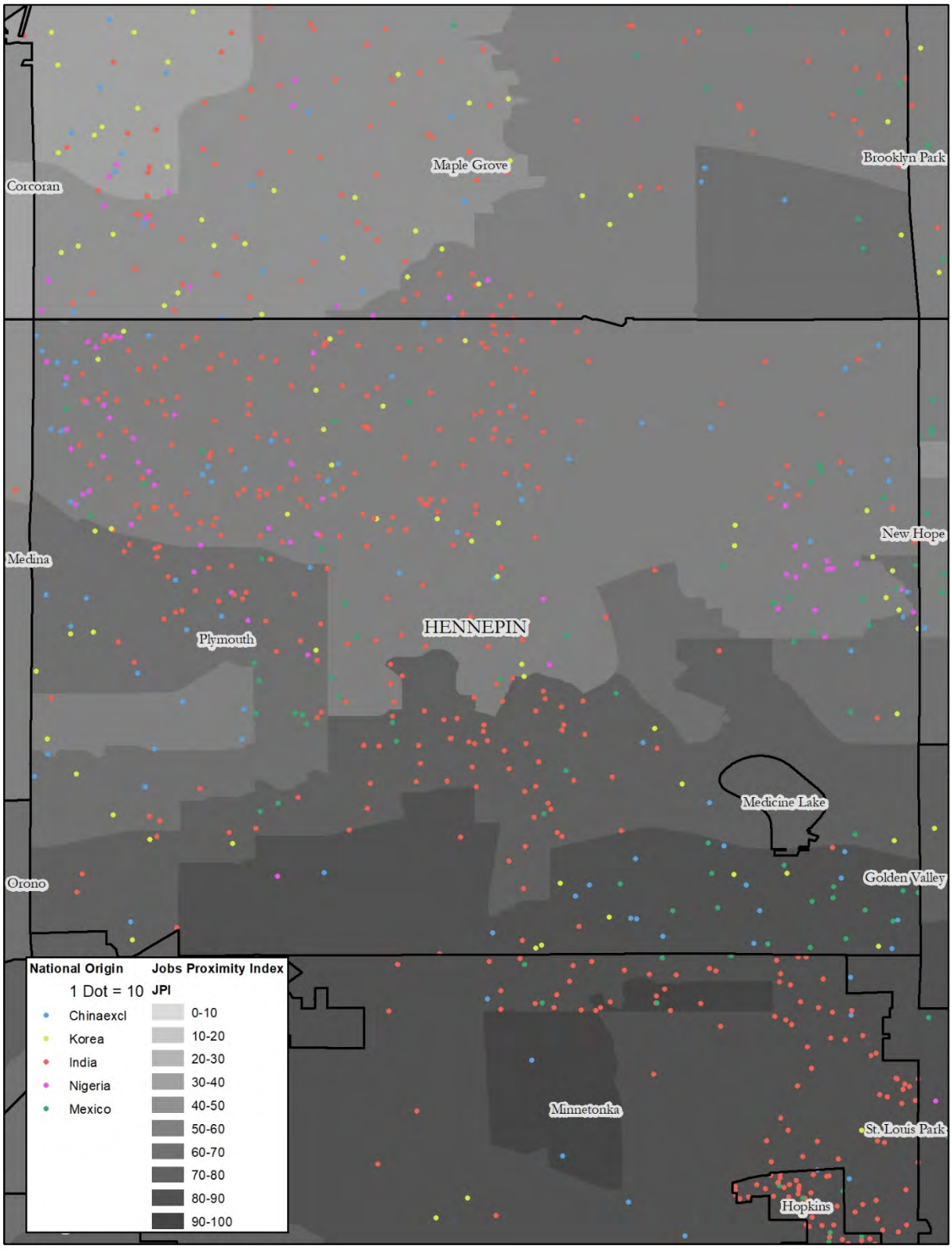
Map 46: Minnetonka, National Origin, Jobs Proximity Index



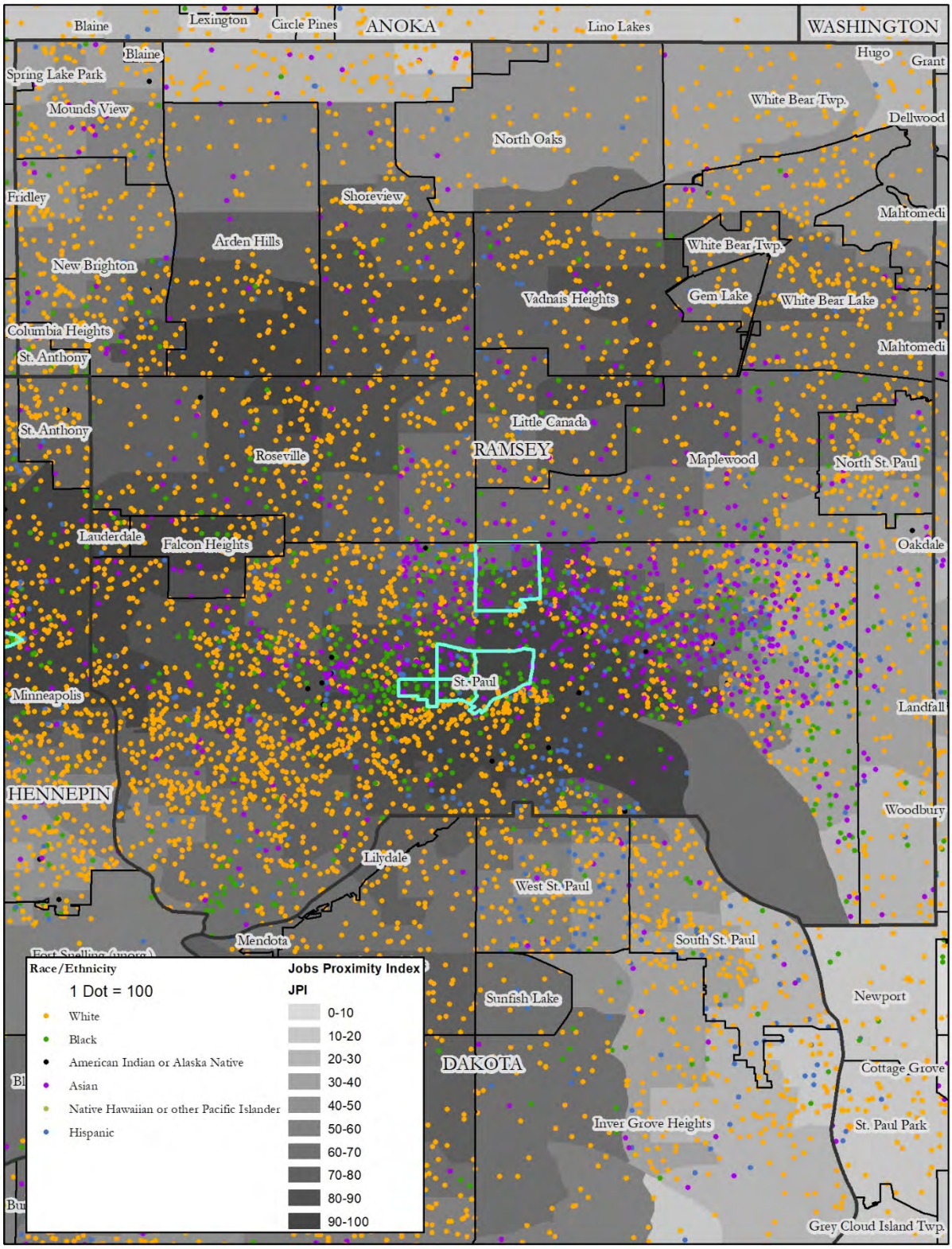
Map 47: Plymouth, Race, Jobs Proximity Index



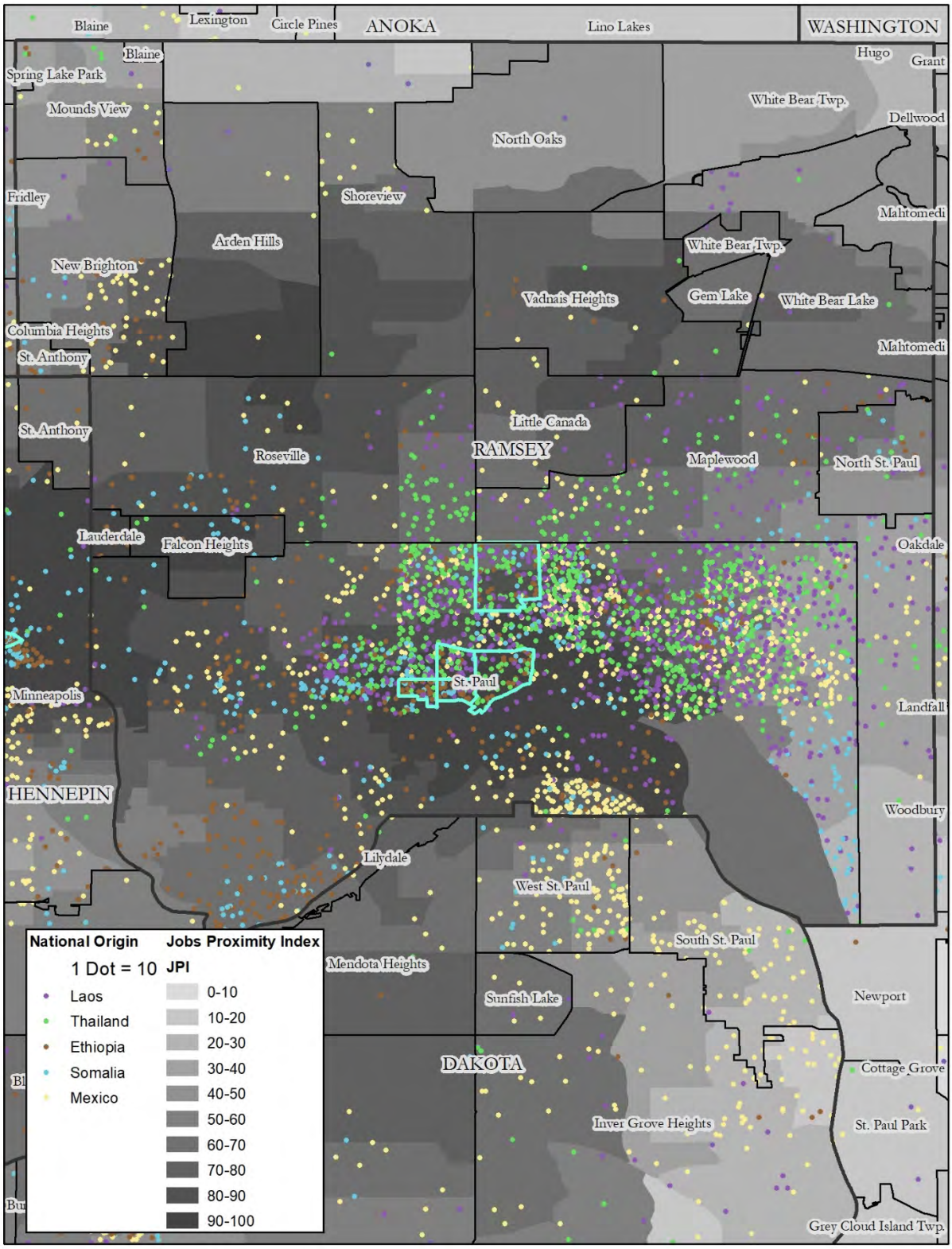
Map 48: Plymouth, National Origin, Jobs Proximity Index



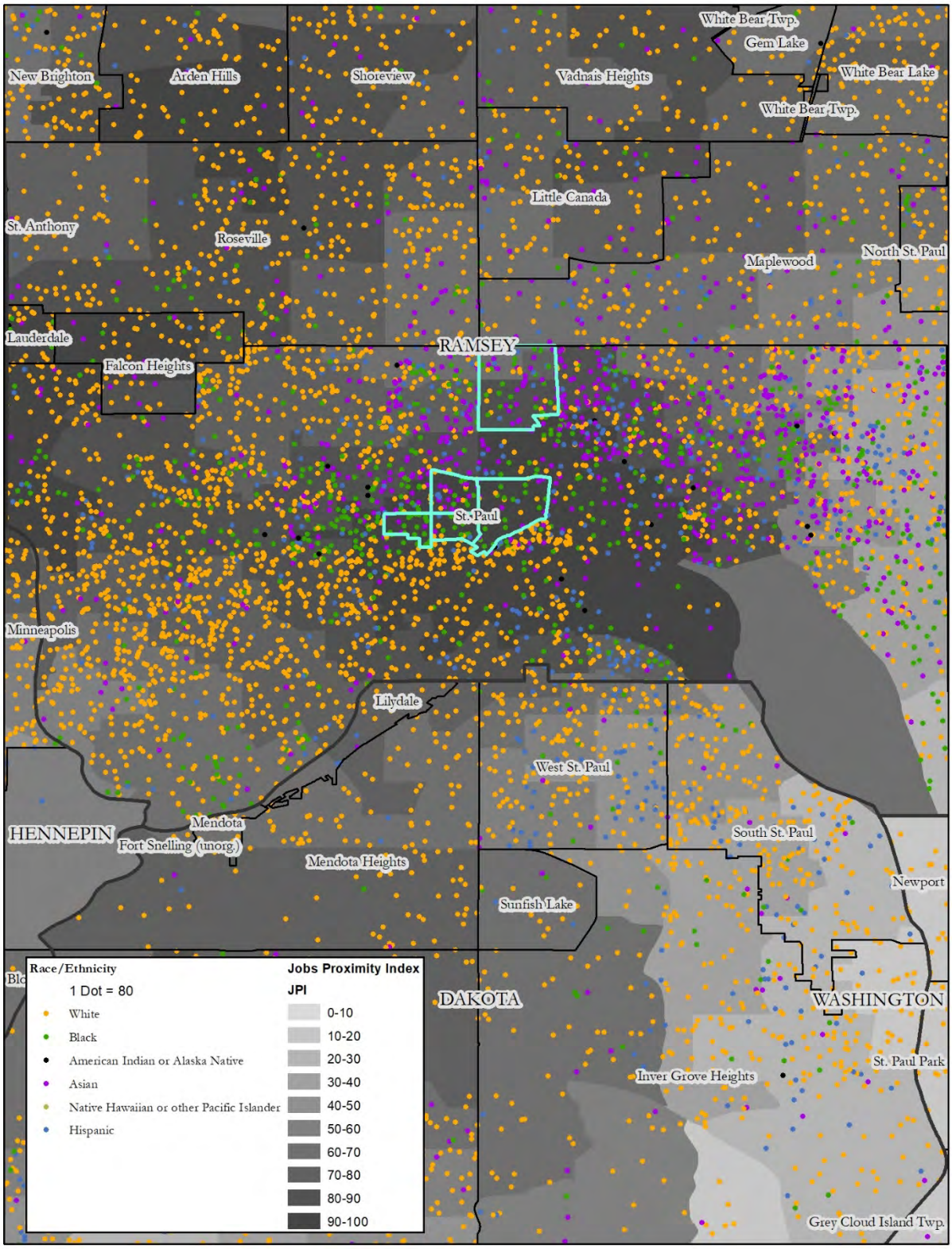
Map 49: Ramsey County, Race, Jobs Proximity Index



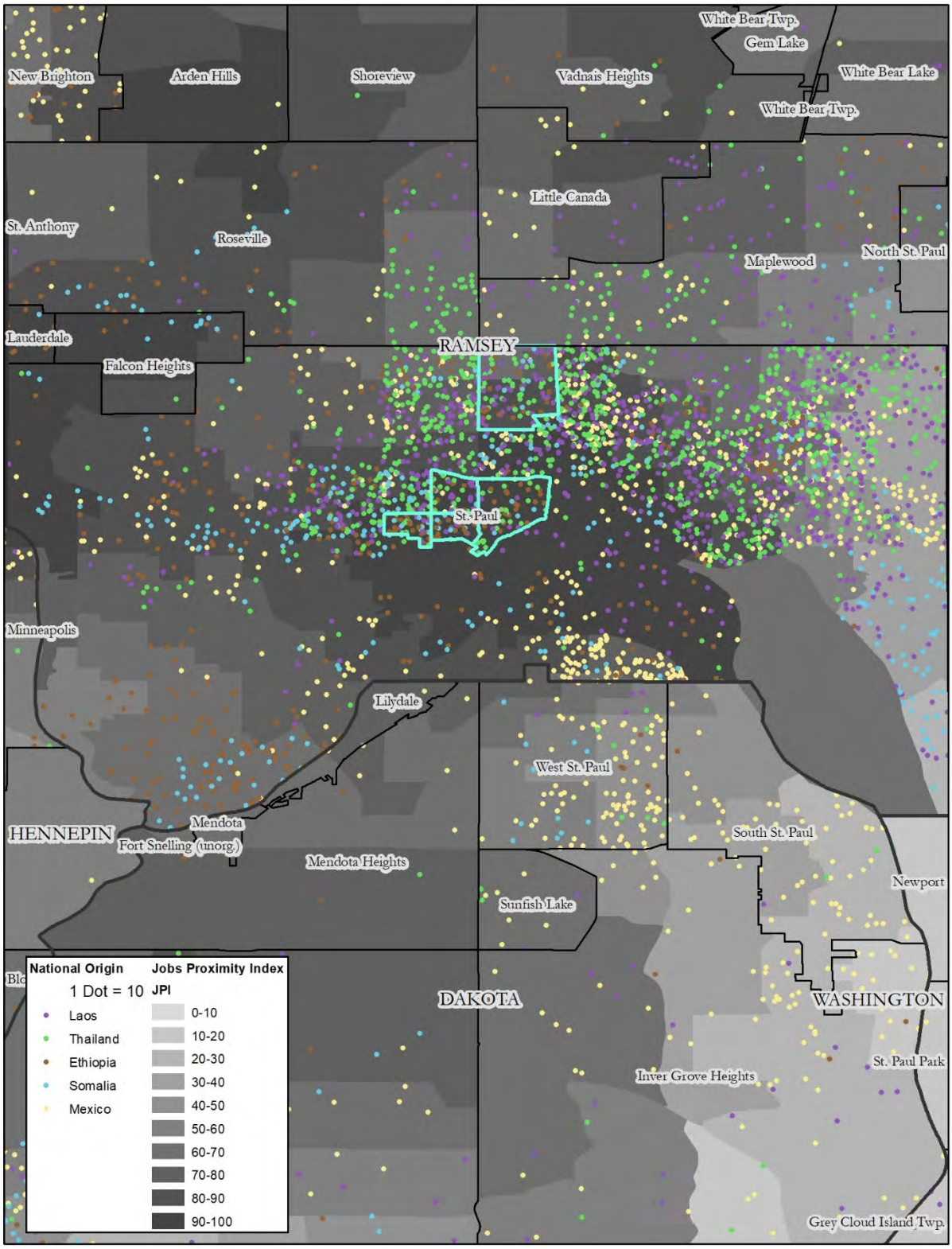
Map 50: Ramsey County, National Origin, Jobs Proximity Index



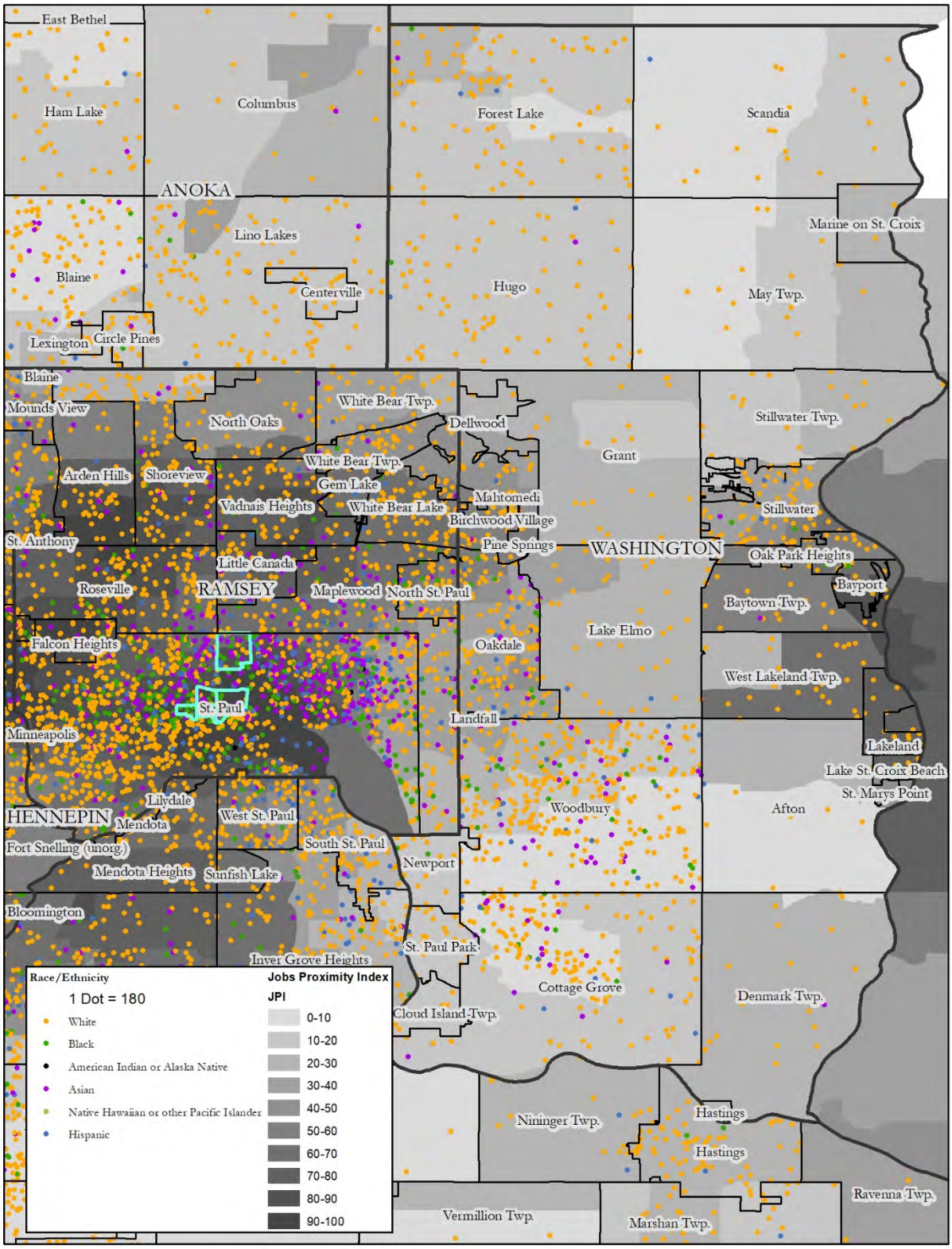
Map 51: St. Paul, Race, Jobs Proximity Index



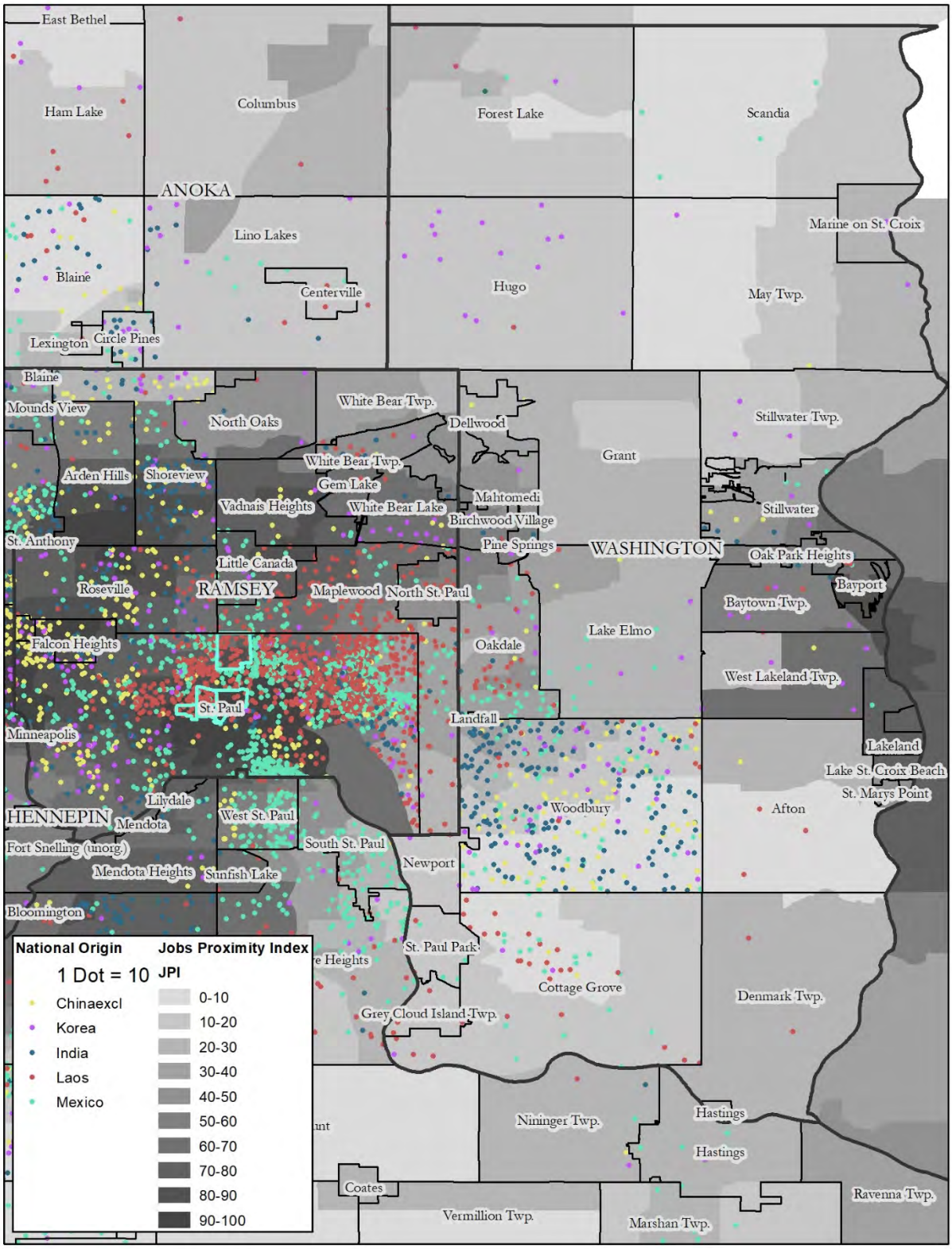
Map 52: St. Paul, National Origin, Jobs Proximity Index



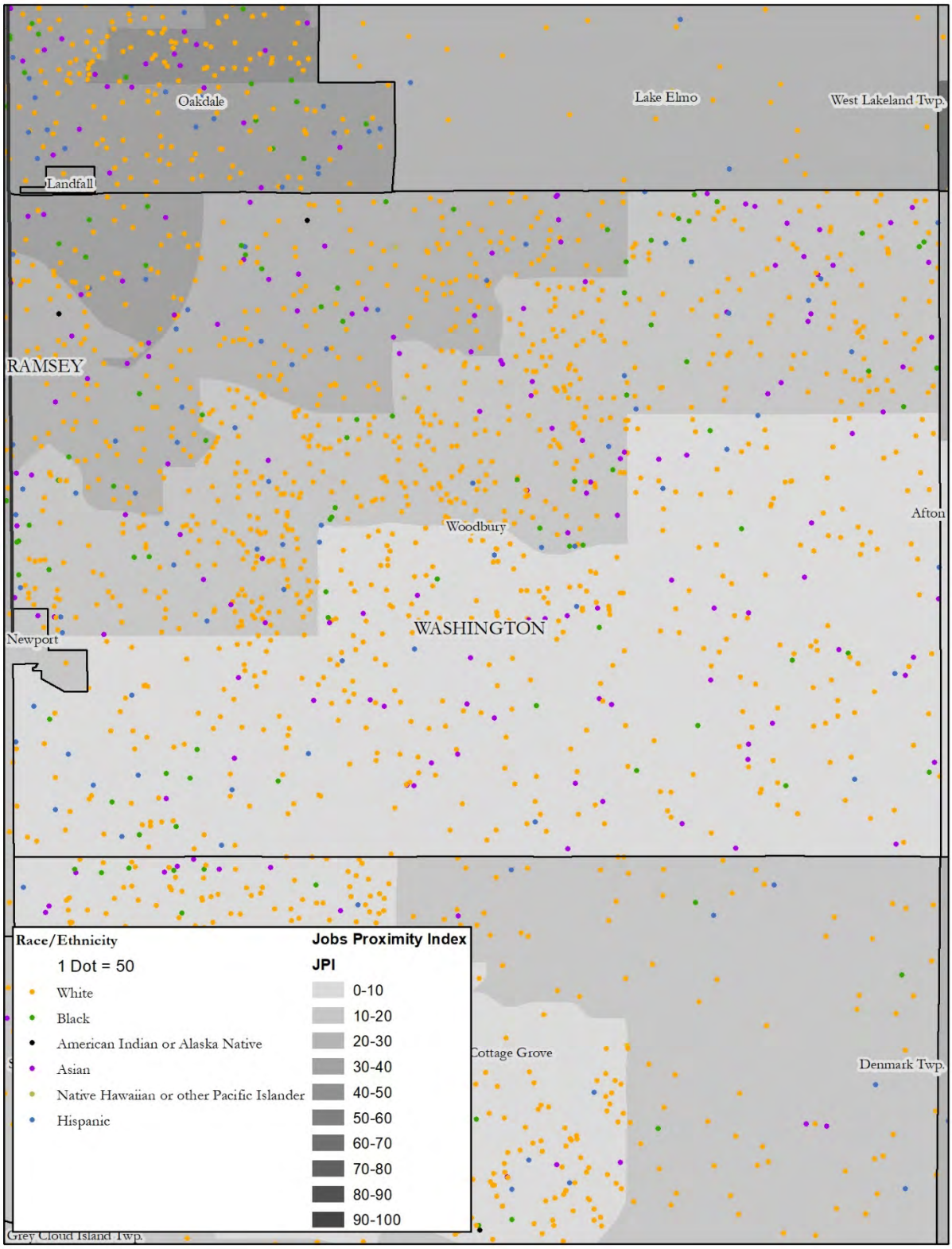
Map 53: Washington County, Race, Jobs Proximity Index



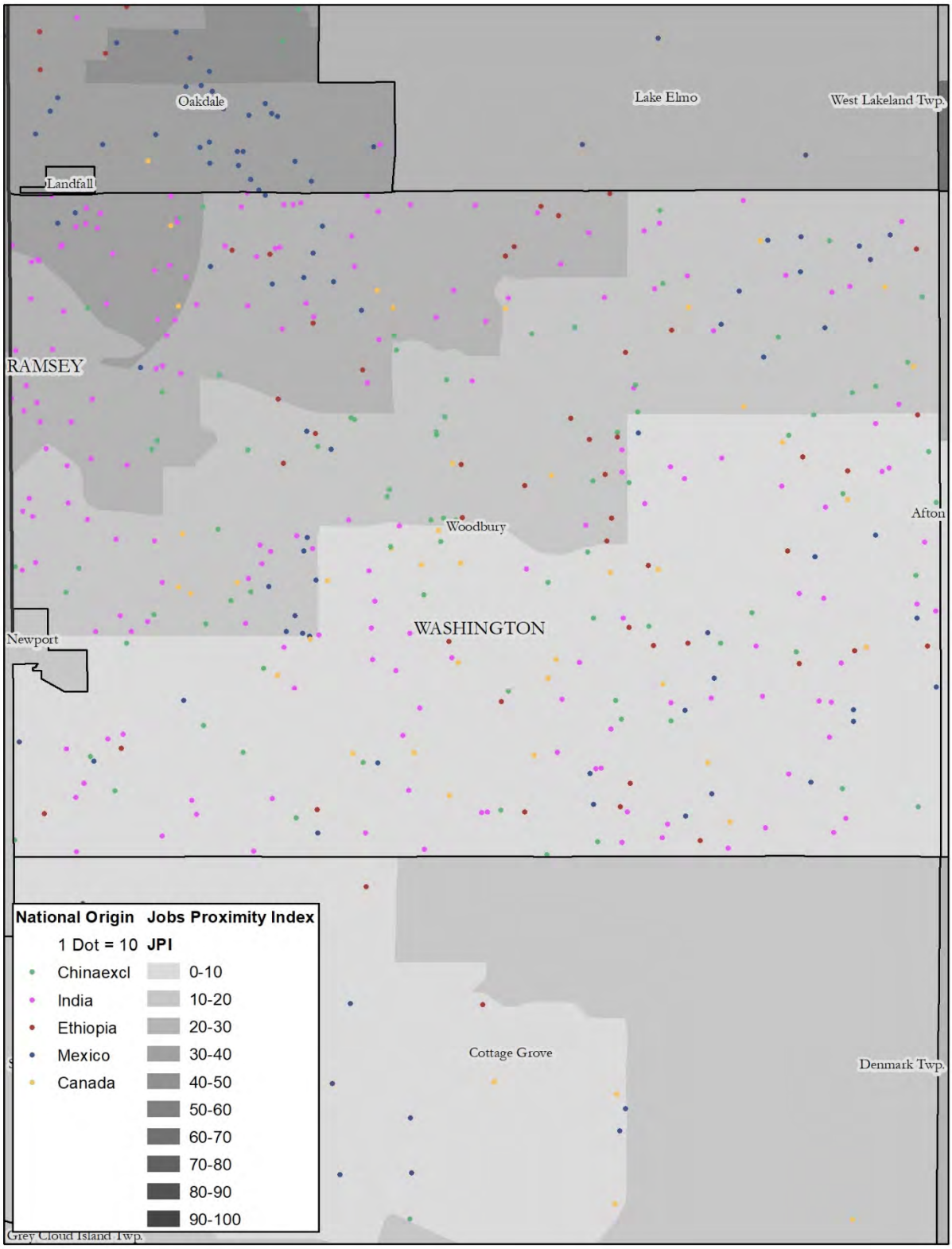
Map 54: Washington County, National Origin, Jobs Proximity Index



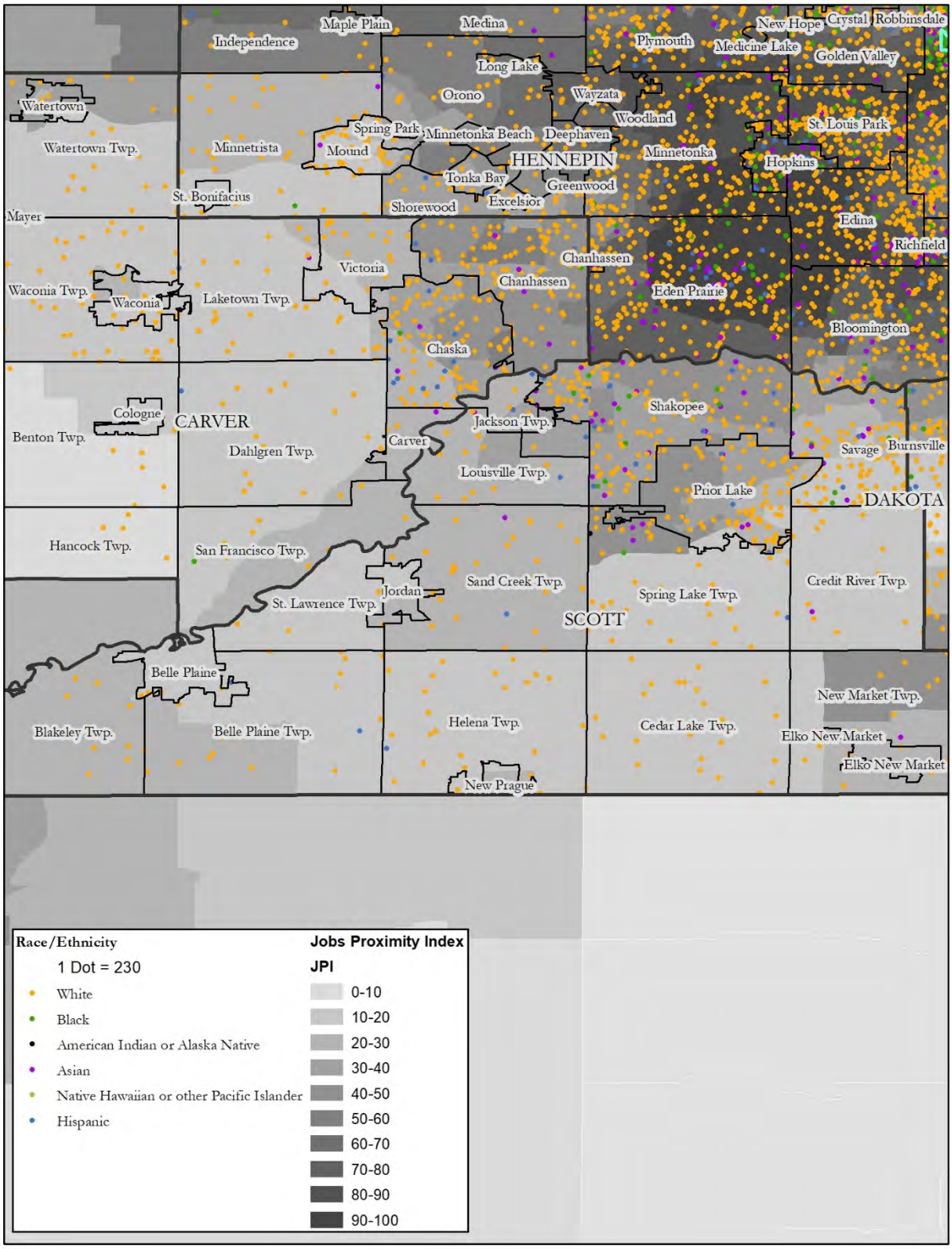
Map 55: Woodbury, Race, Jobs Proximity Index



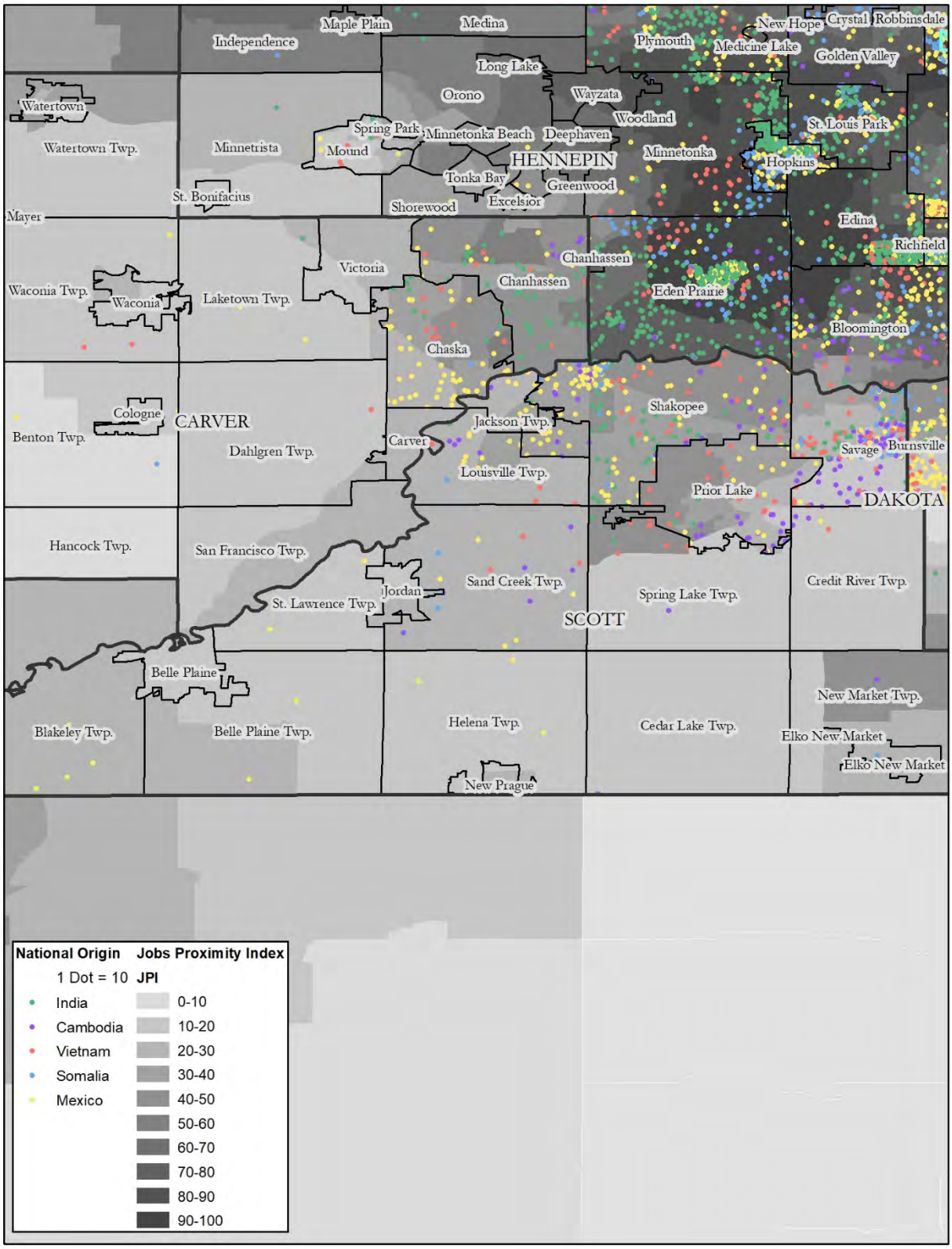
Map 56: Woodbury, National Origin, Jobs Proximity Index



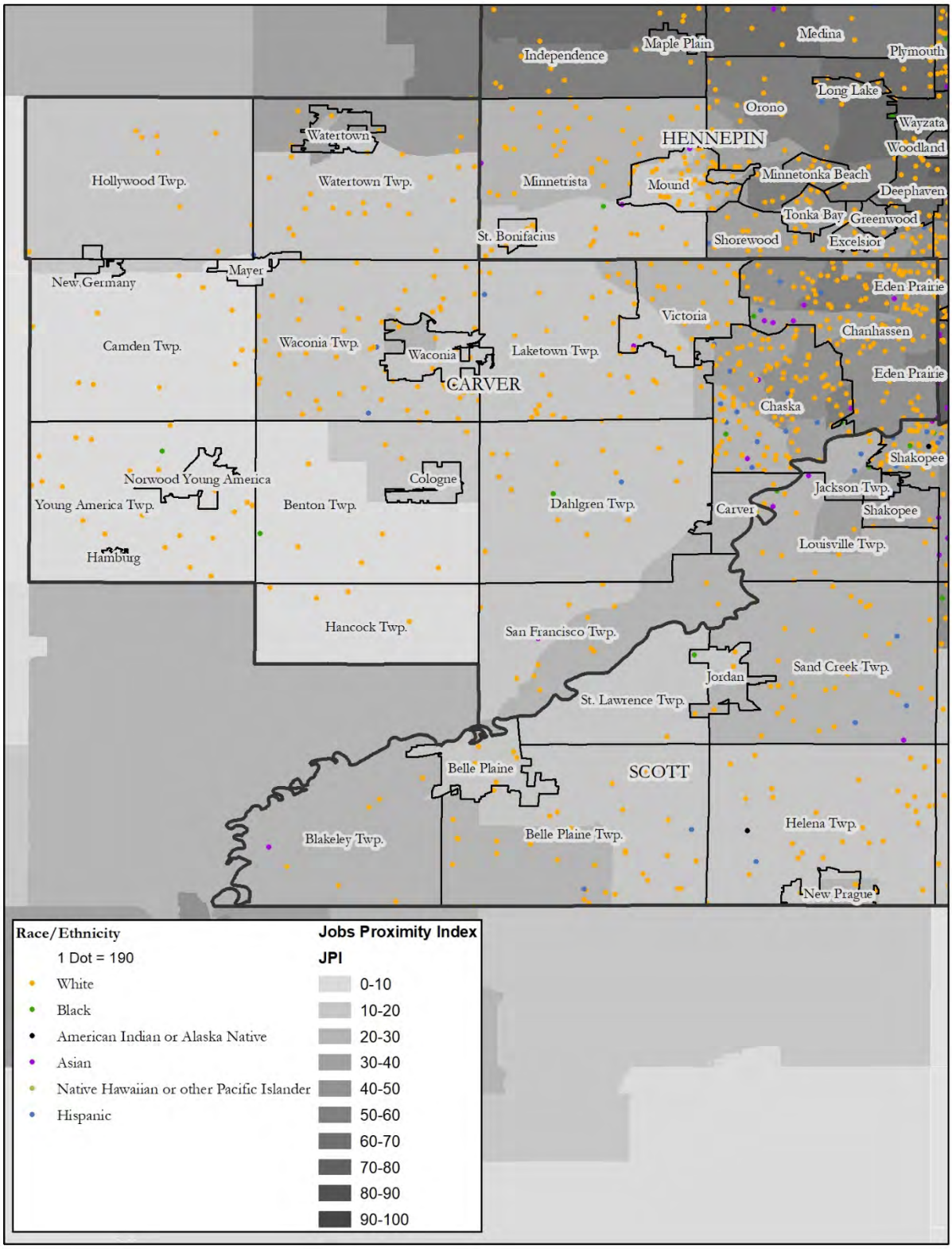
Map 57: Scott County, Race, Jobs Proximity Index



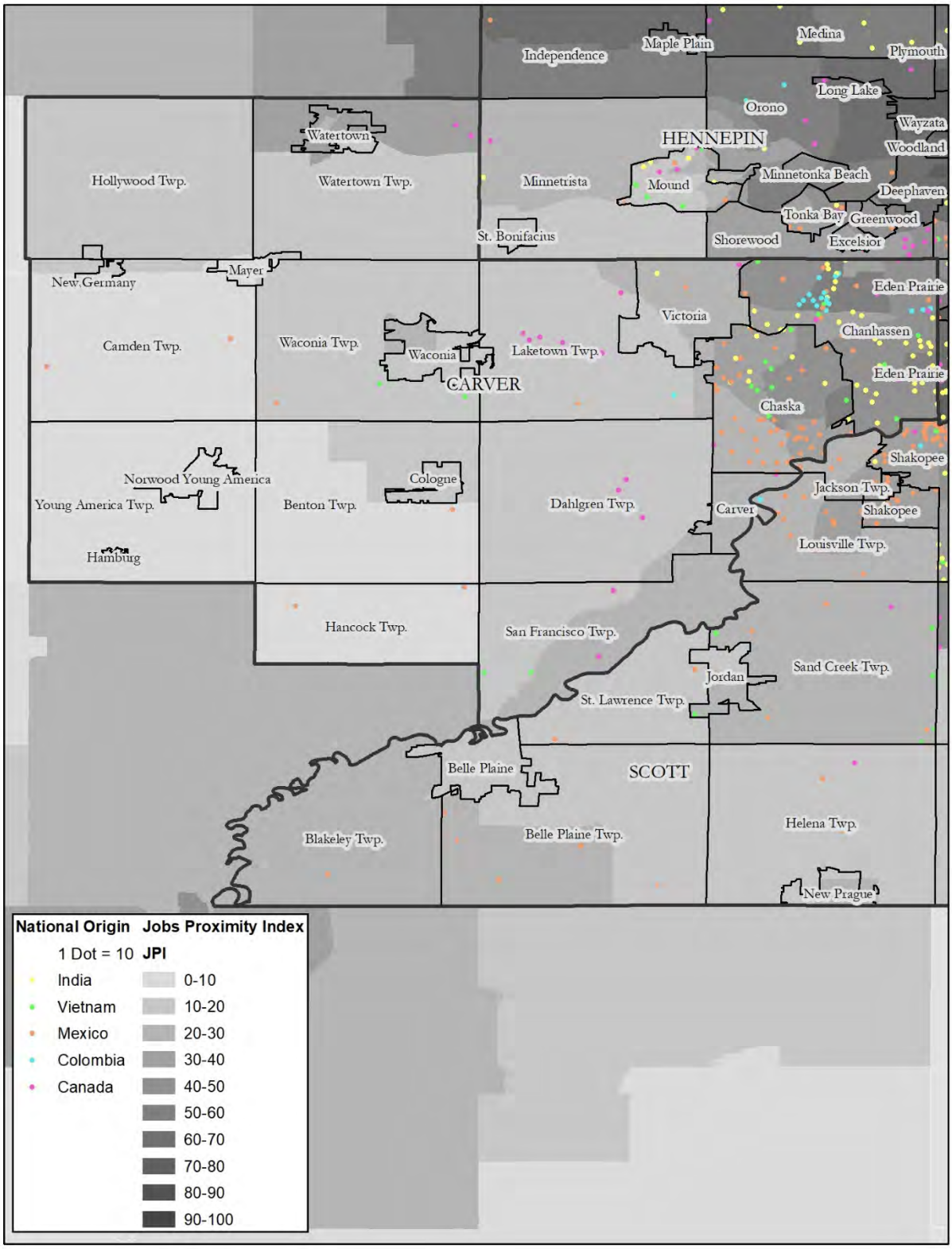
Map 58: Scott County, National Origin, Jobs Proximity Index



Map 59: Carver County, Race, Jobs Proximity Index



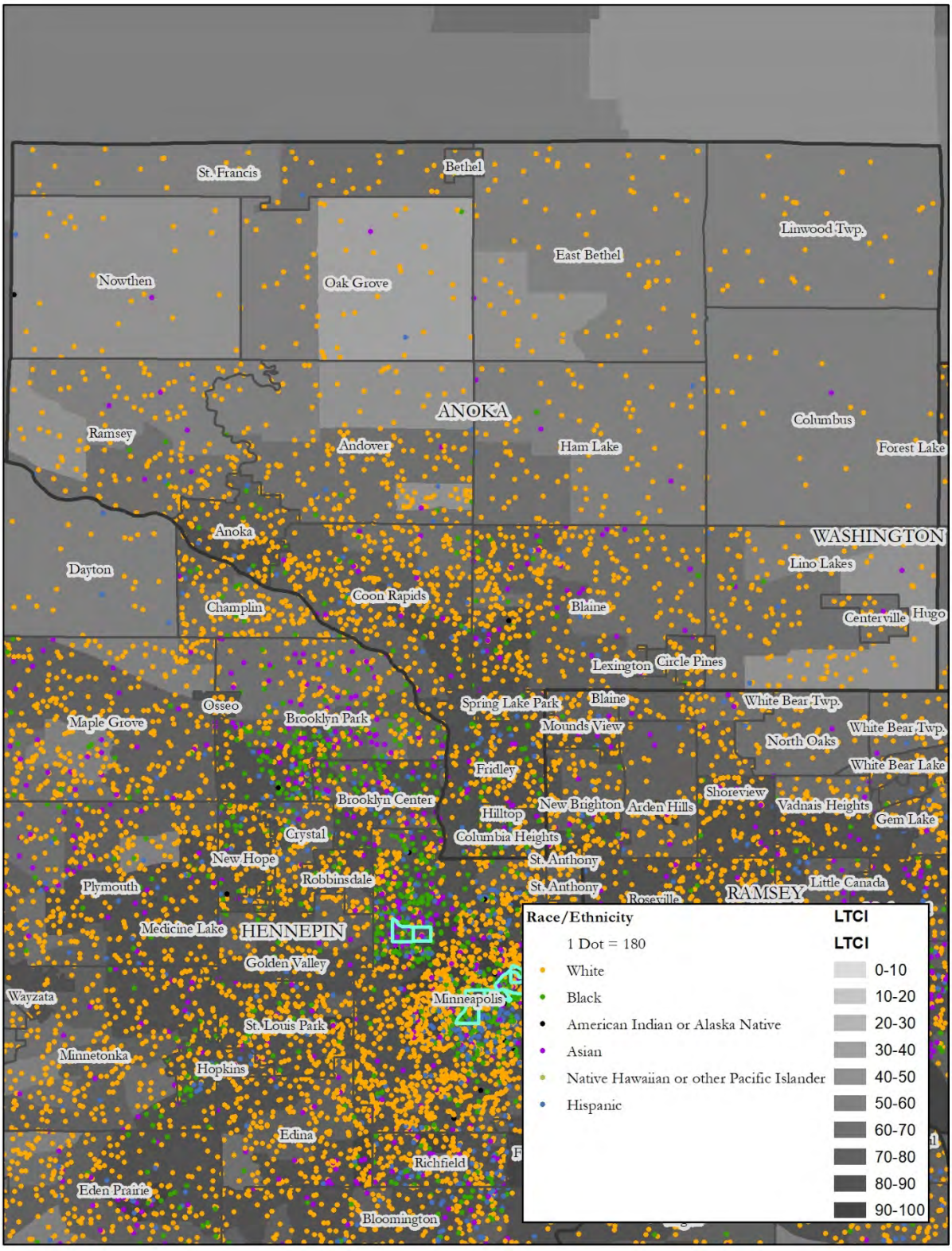
Map 60: Carver County, National Origin, Jobs Proximity Index



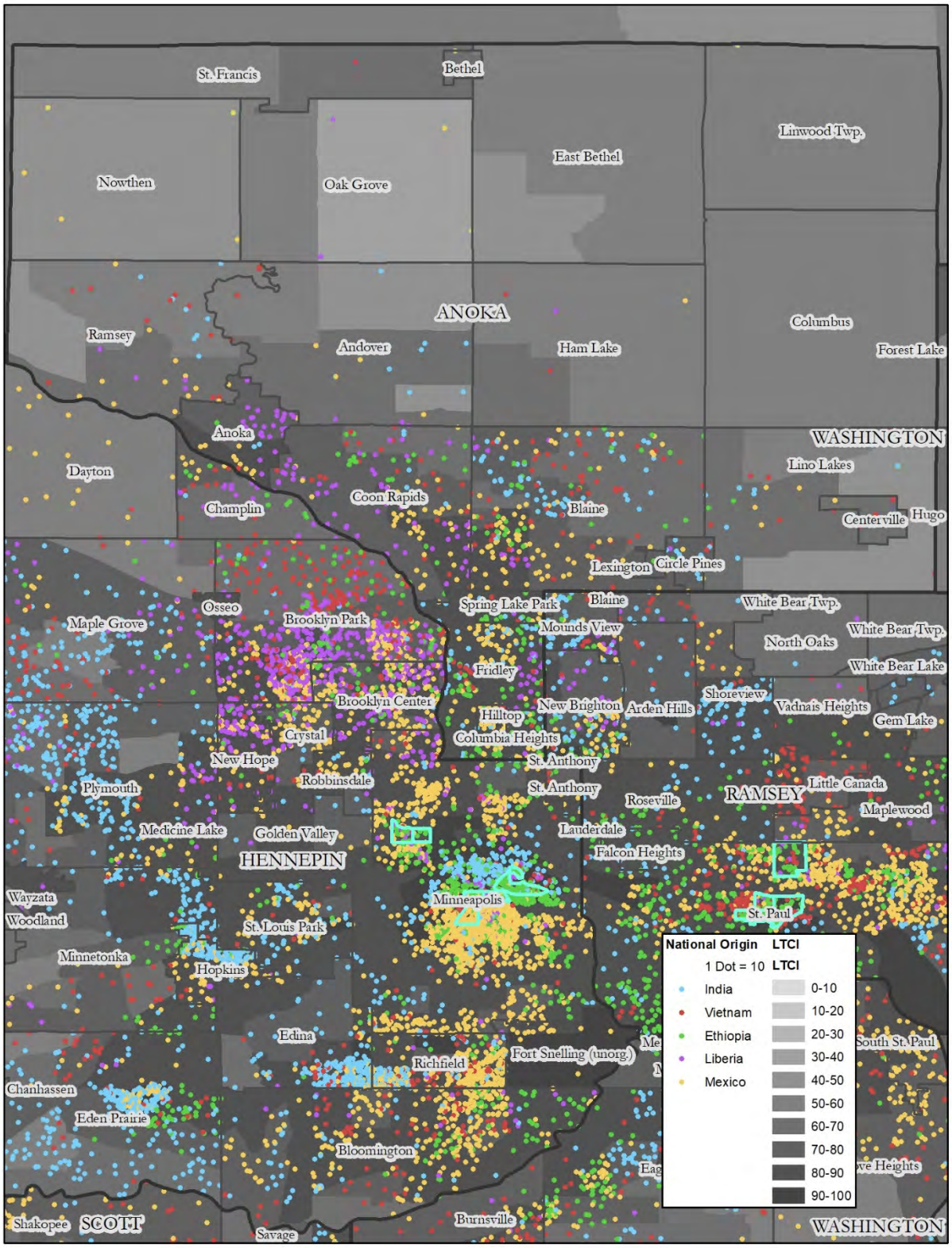
Transportation

1. **Low Transportation Cost Index**
2. **Transit Trips Index**

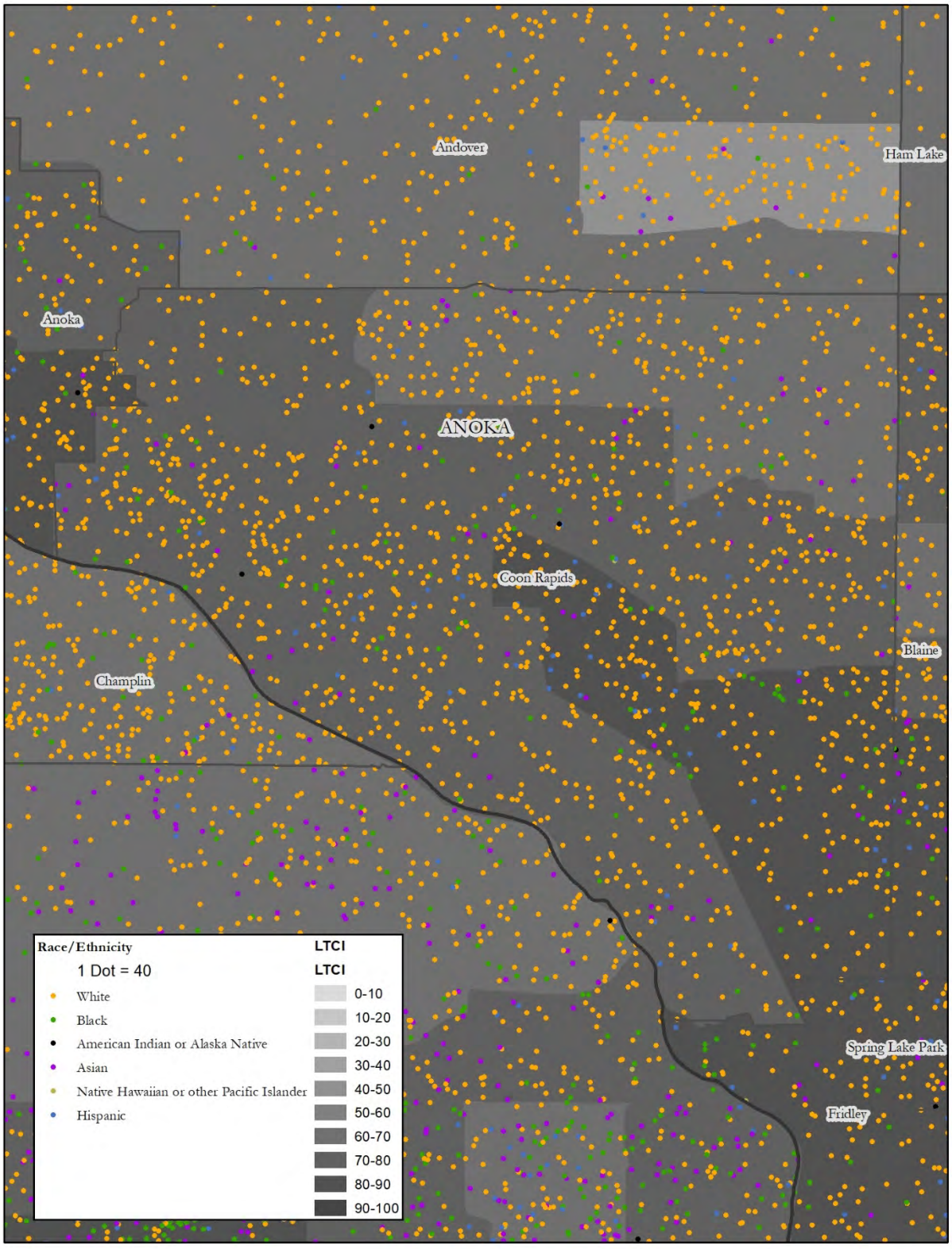
Map 1: Anoka County, Race, Low Transportation Cost Index



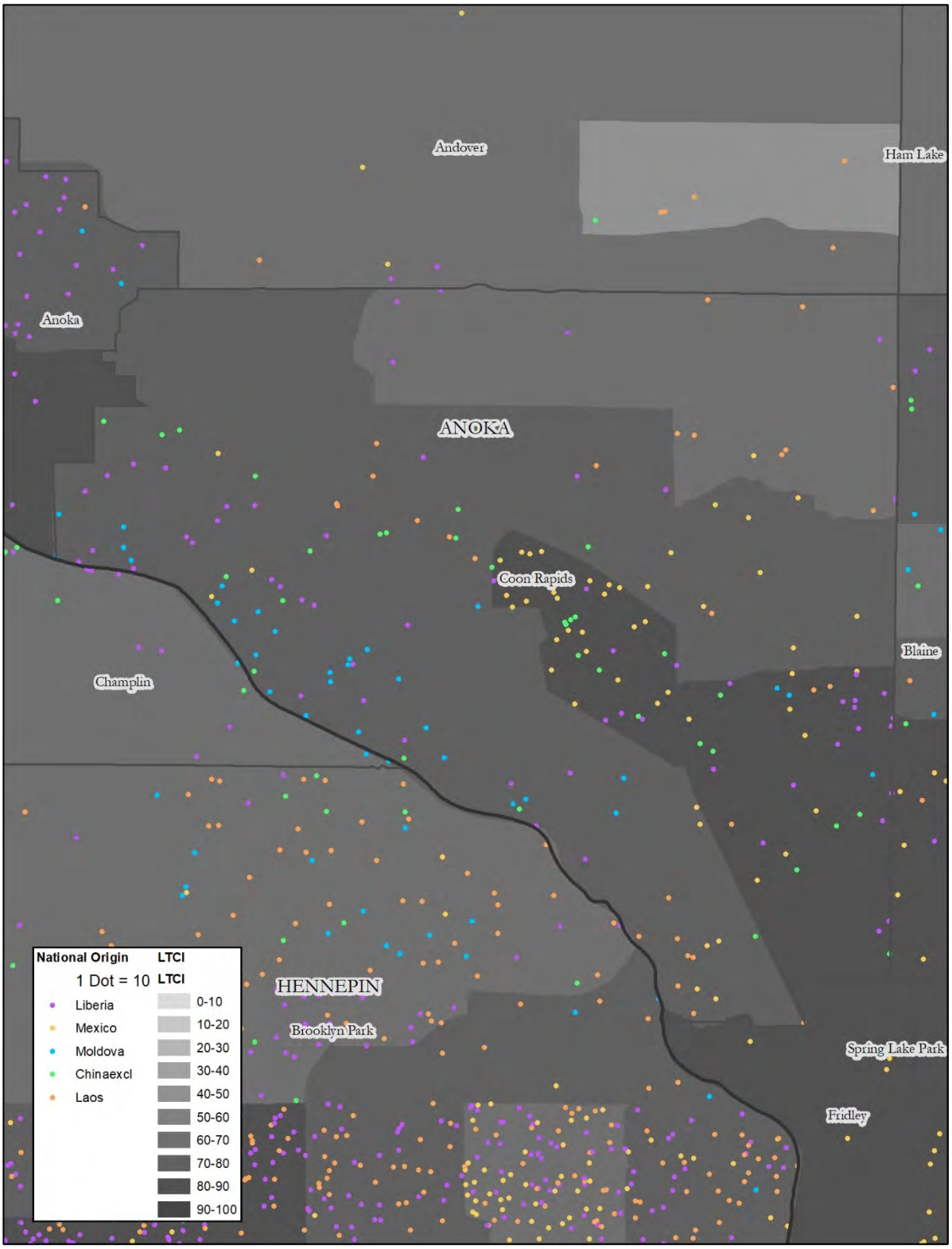
Map 2: Anoka County, National Origin, Low Transportation Cost Index



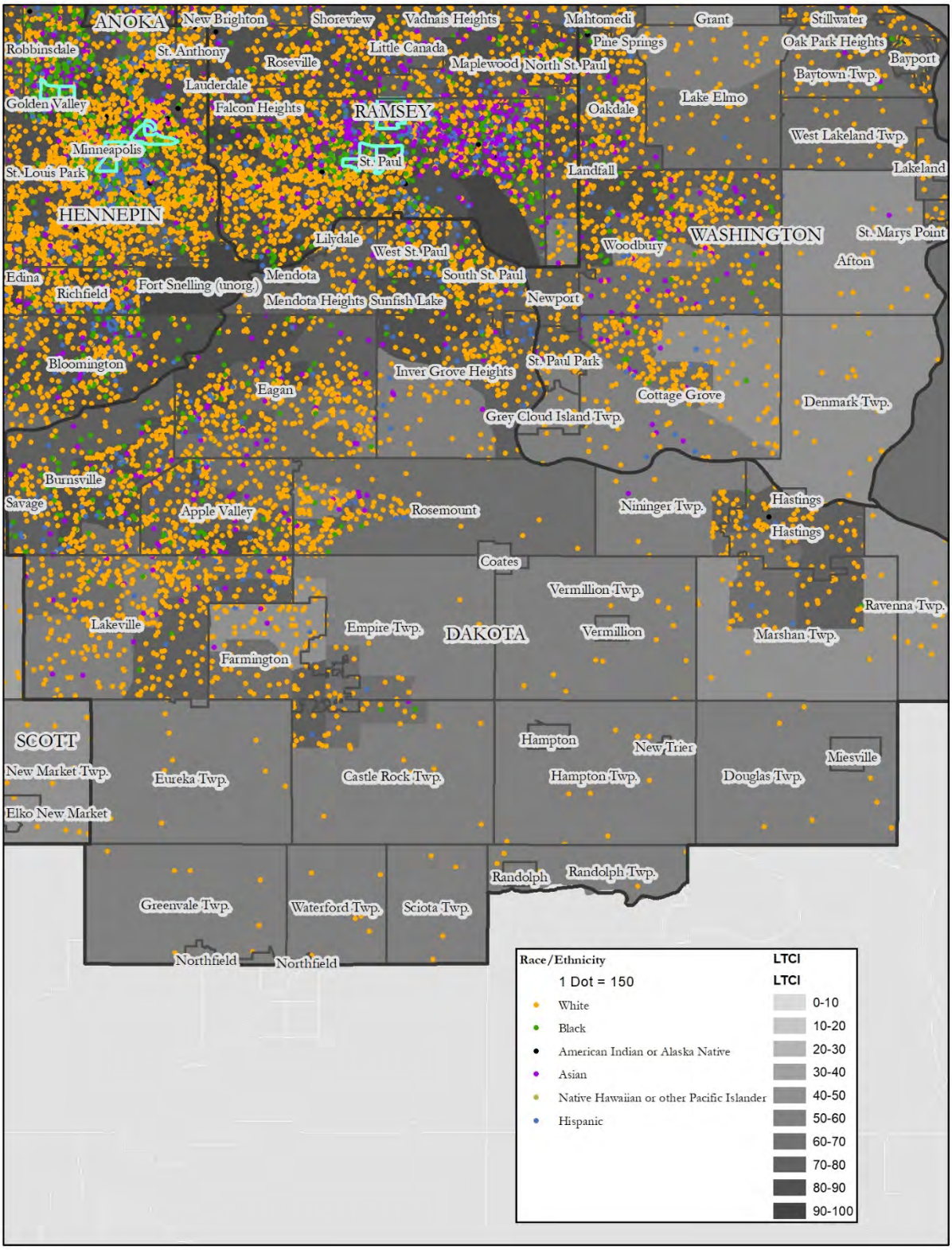
Map 3: Coon Rapids, Race, Low Transportation Cost Index



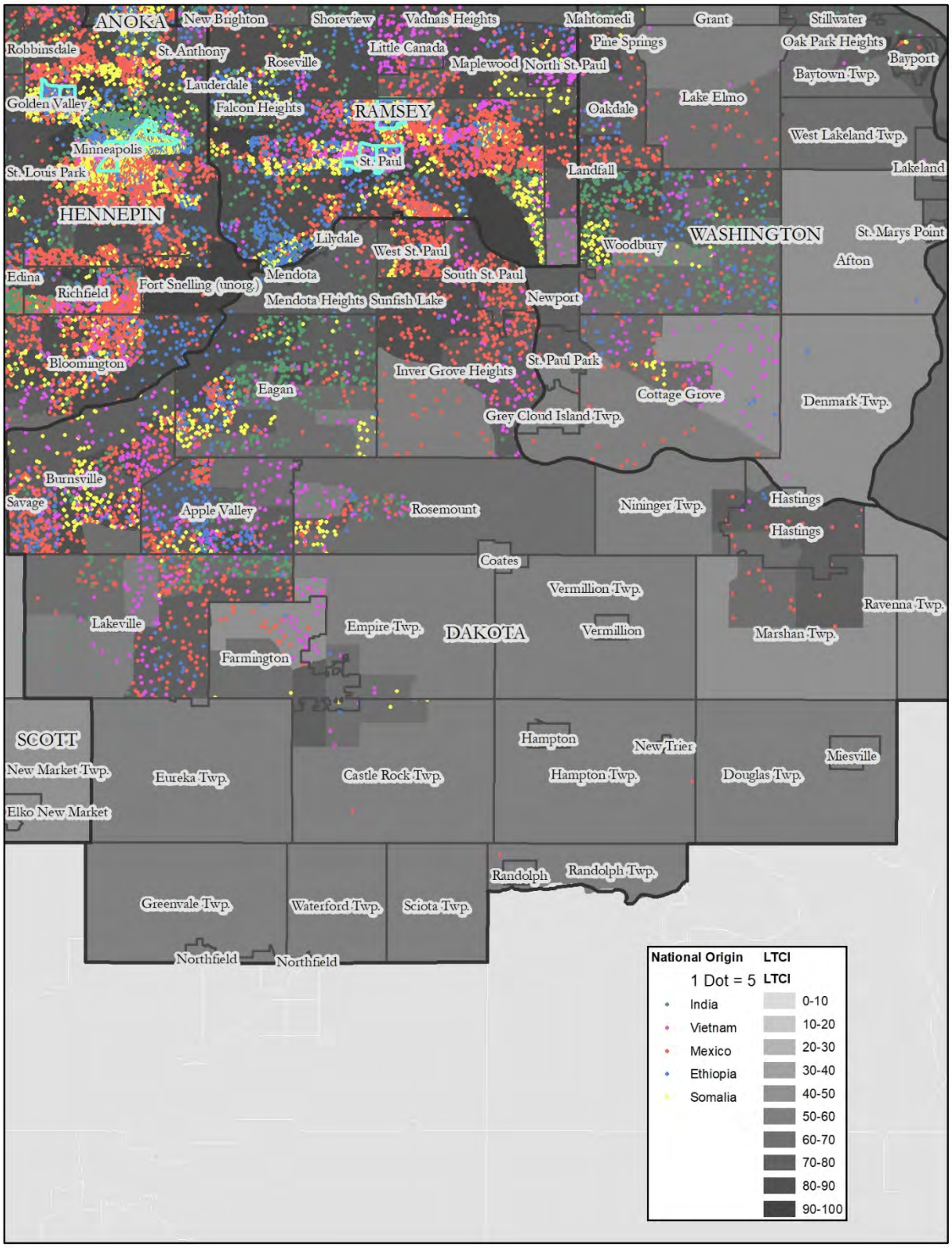
Map 4: Coon Rapids, National Origin, Low Transportation Cost Index



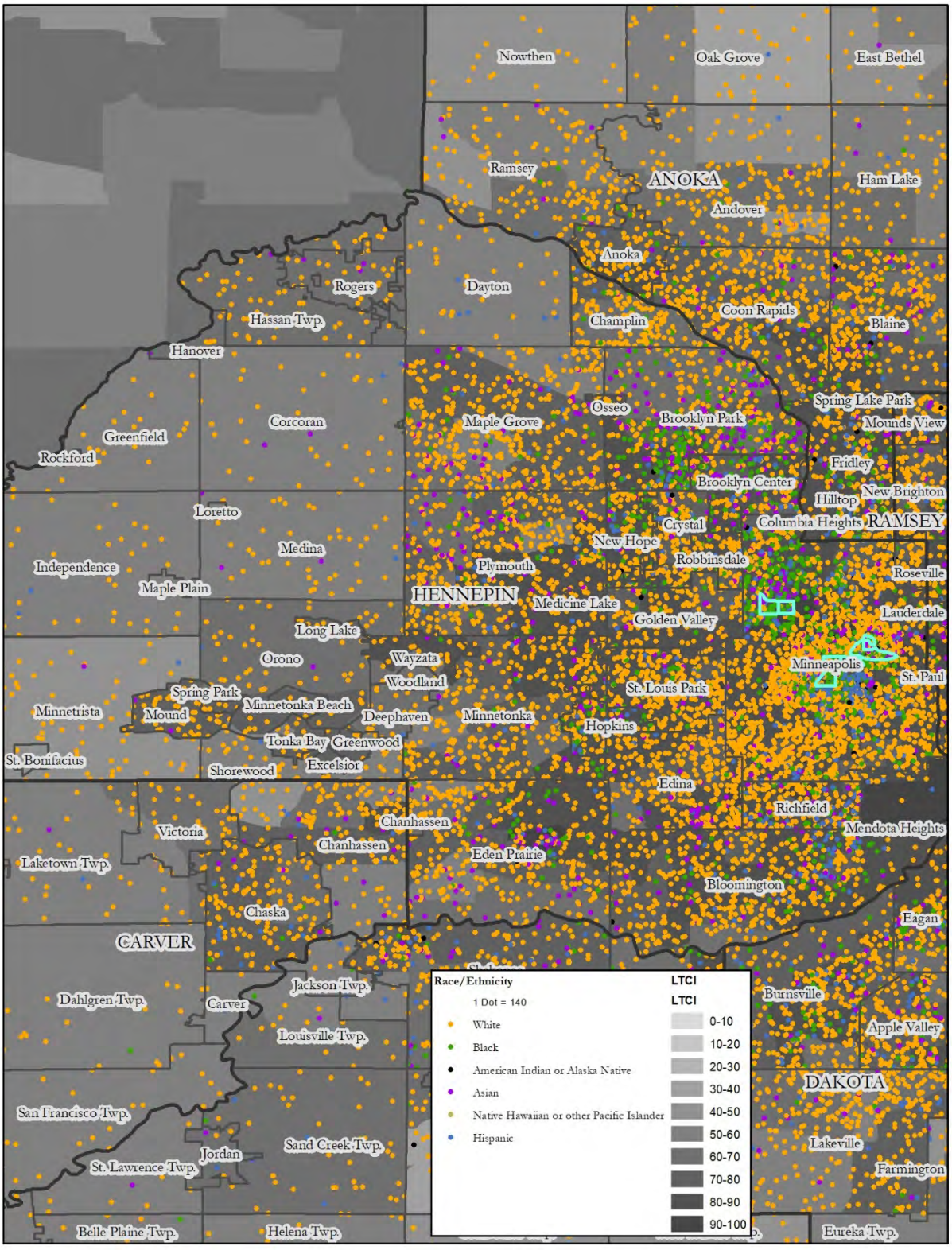
Map 5: Dakota County, Race, Low Transportation Cost Index



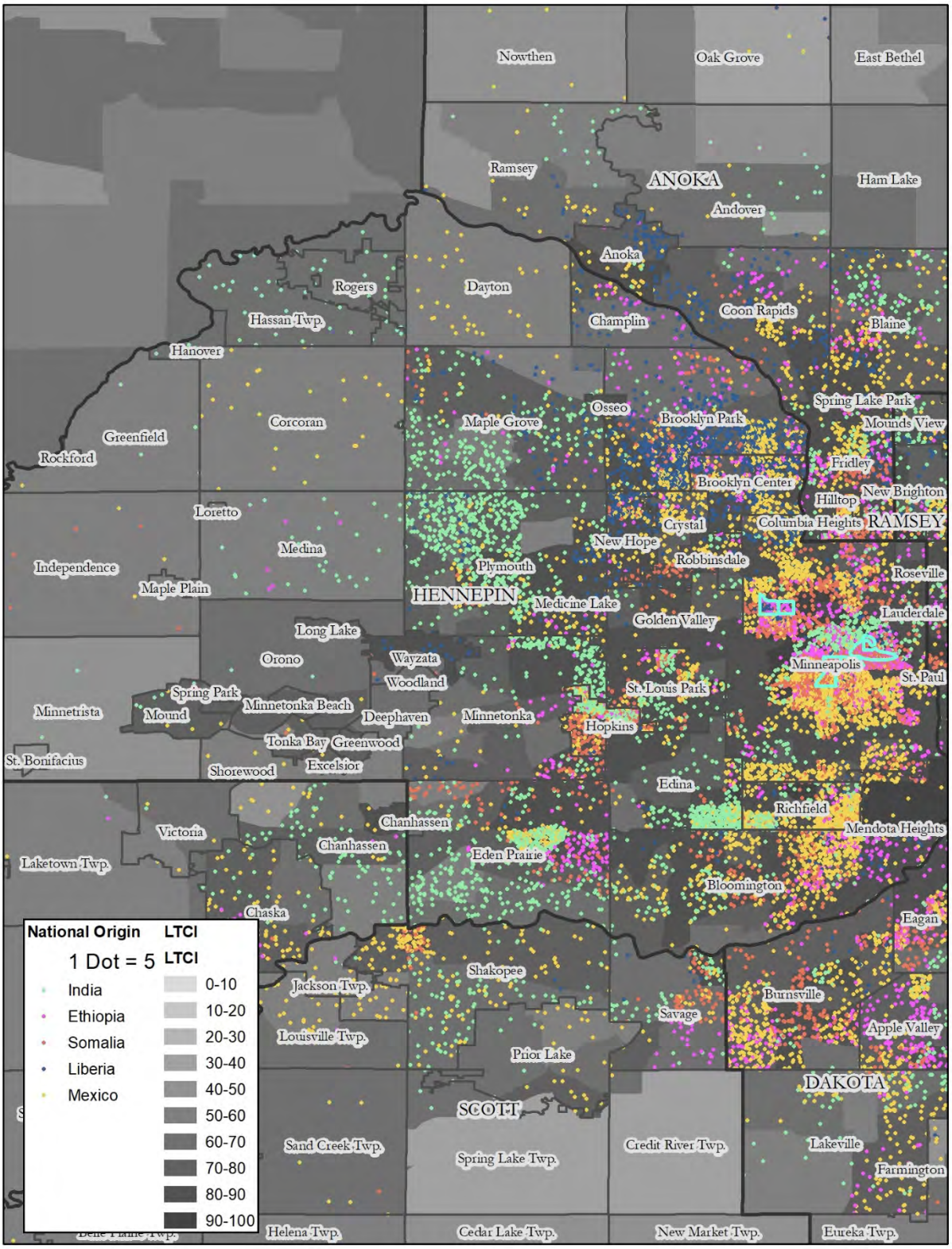
Map 6: Dakota County, National Origin, Low Transportation Cost Index



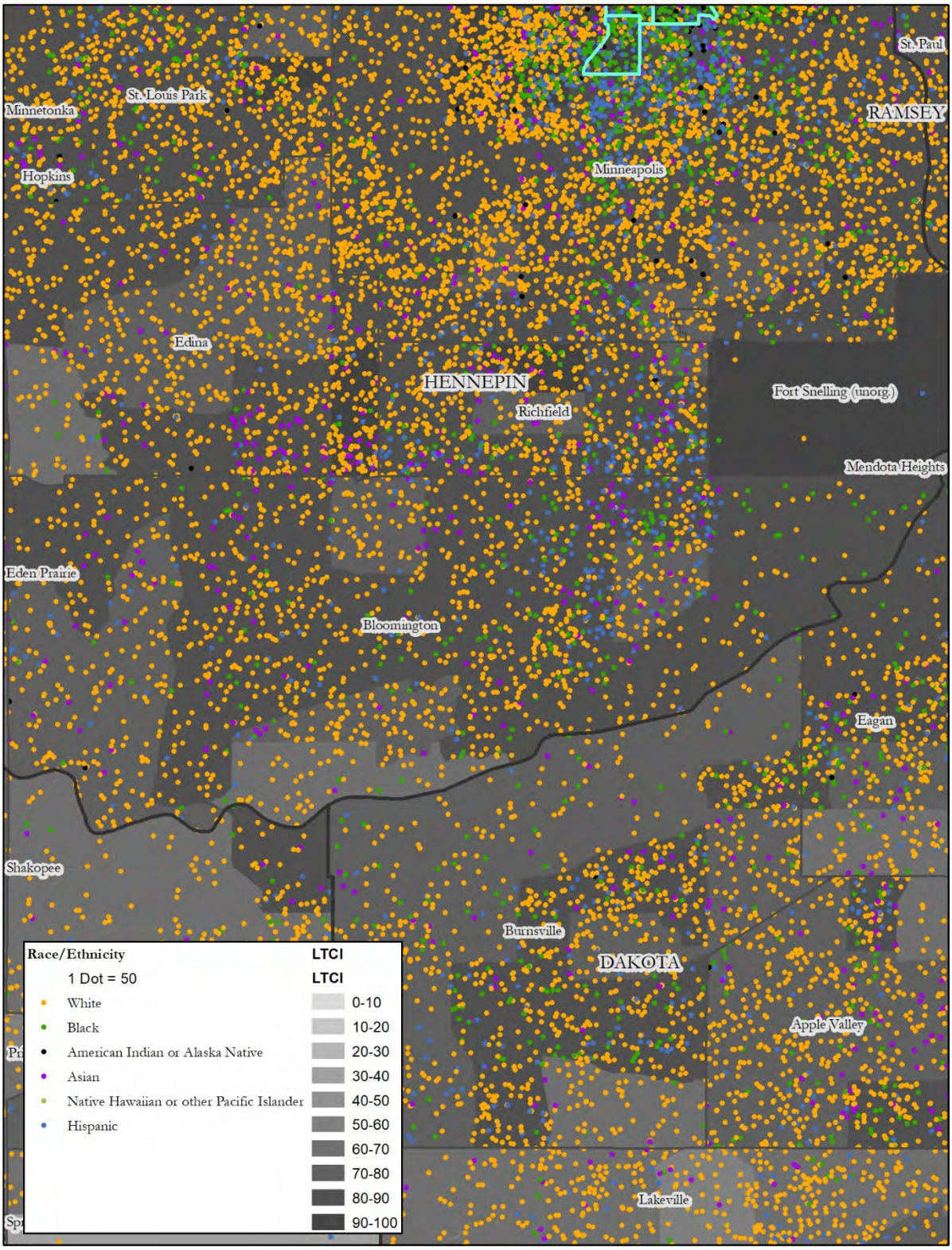
Map 7: Hennepin County, Race, Low Transportation Cost Index



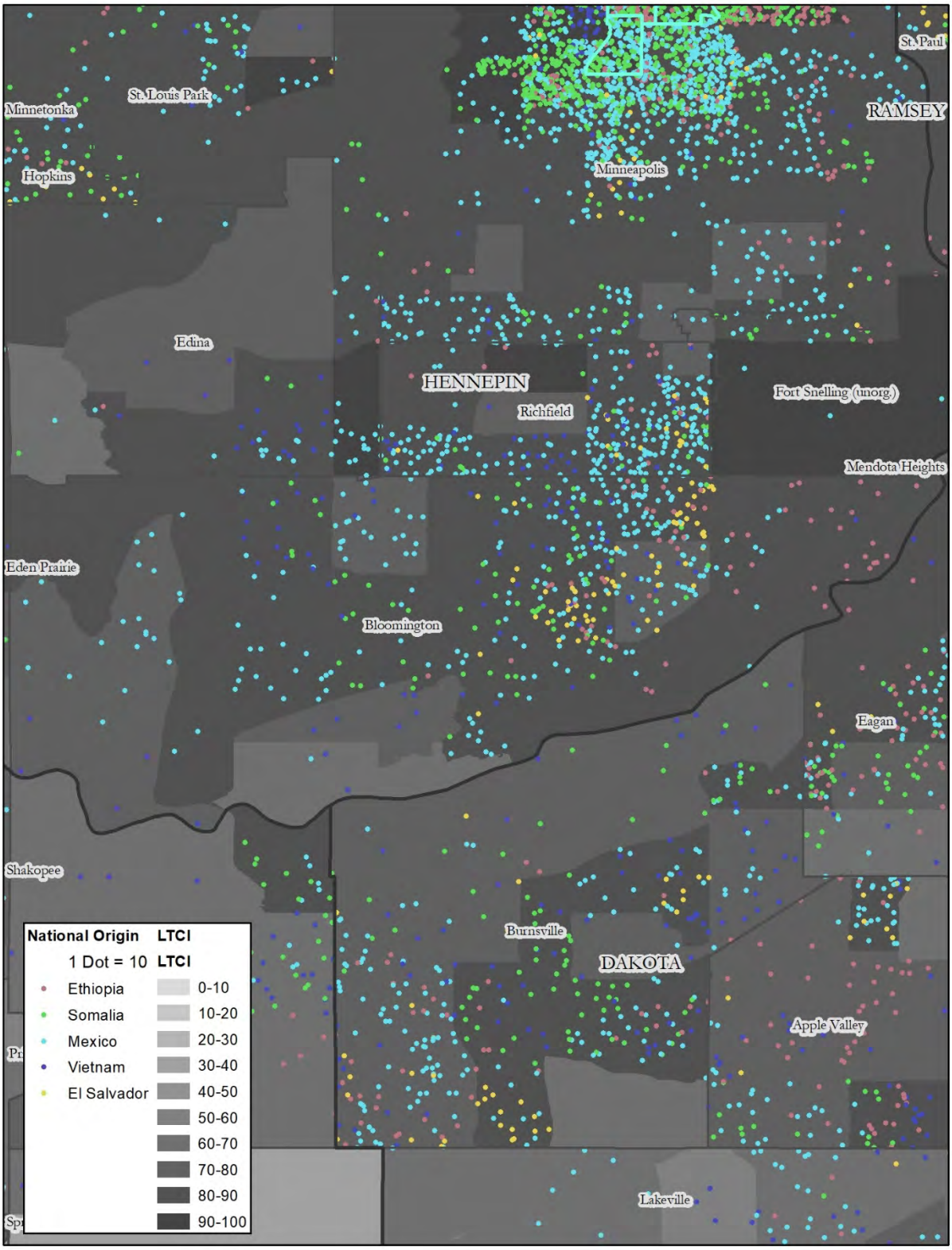
Map 8: Hennepin County, National Origin, Low Transportation Cost Index



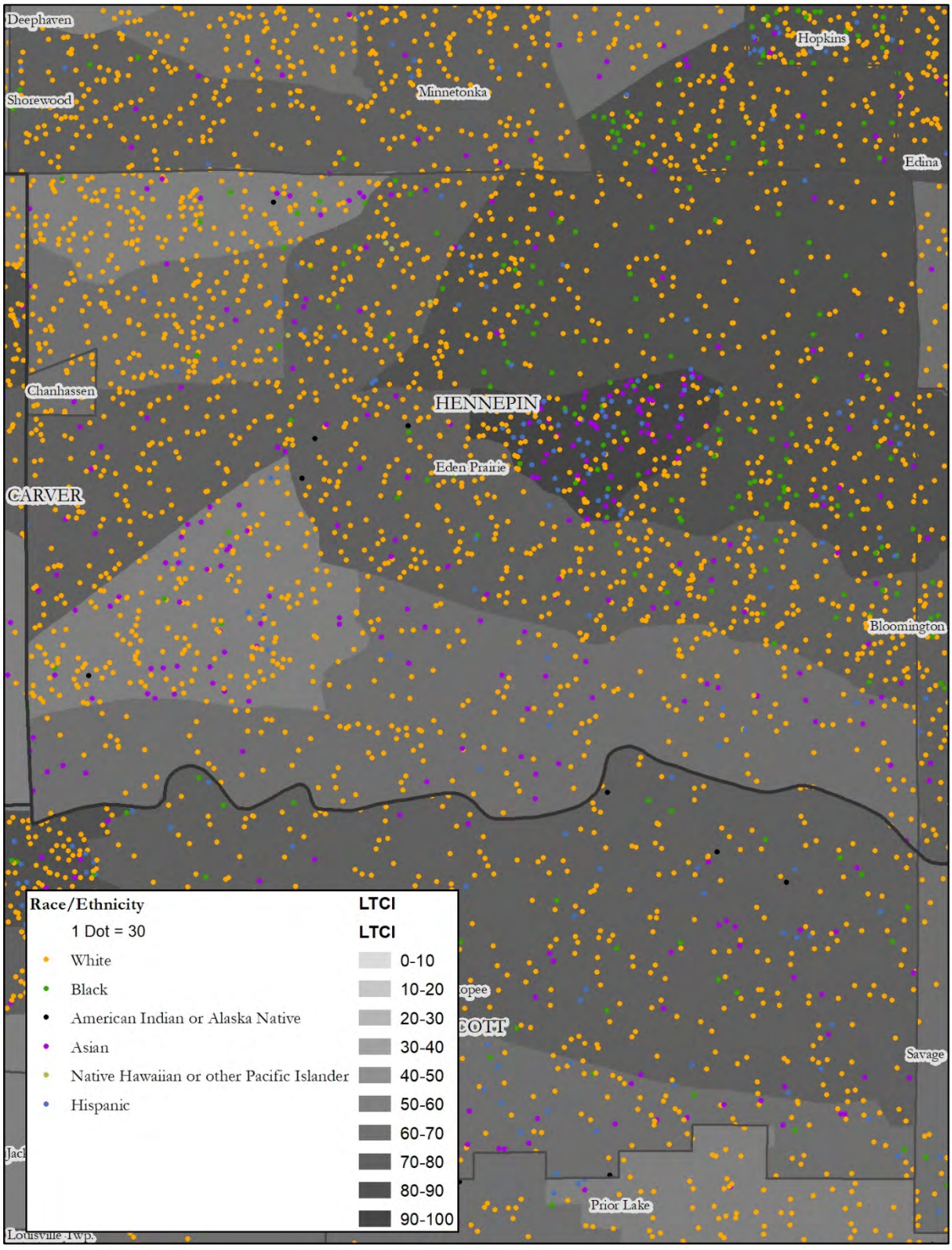
Map 9: Bloomington, Race, Low Transportation Cost Index



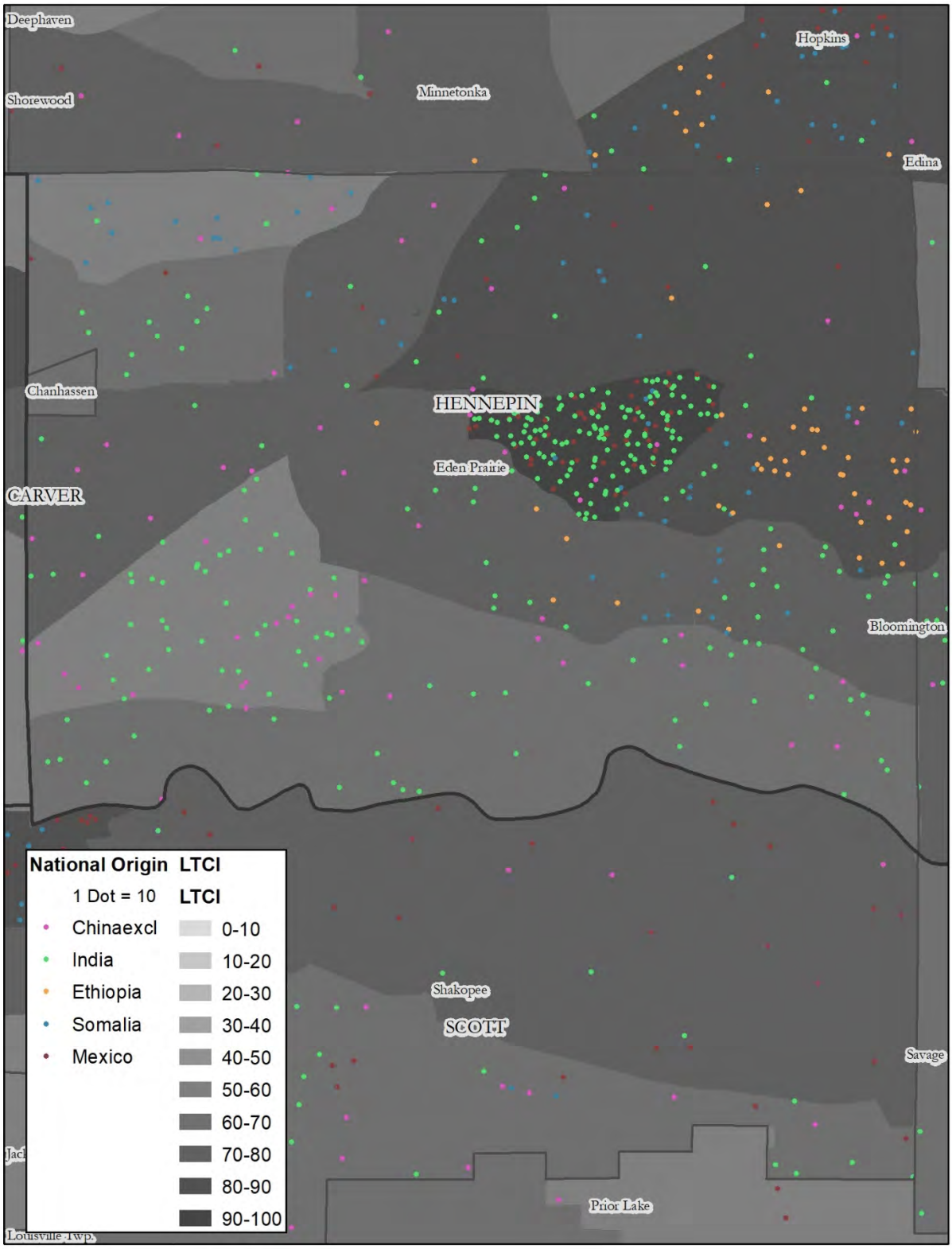
Map 10: Bloomington, National Origin, Low Transportation Cost Index



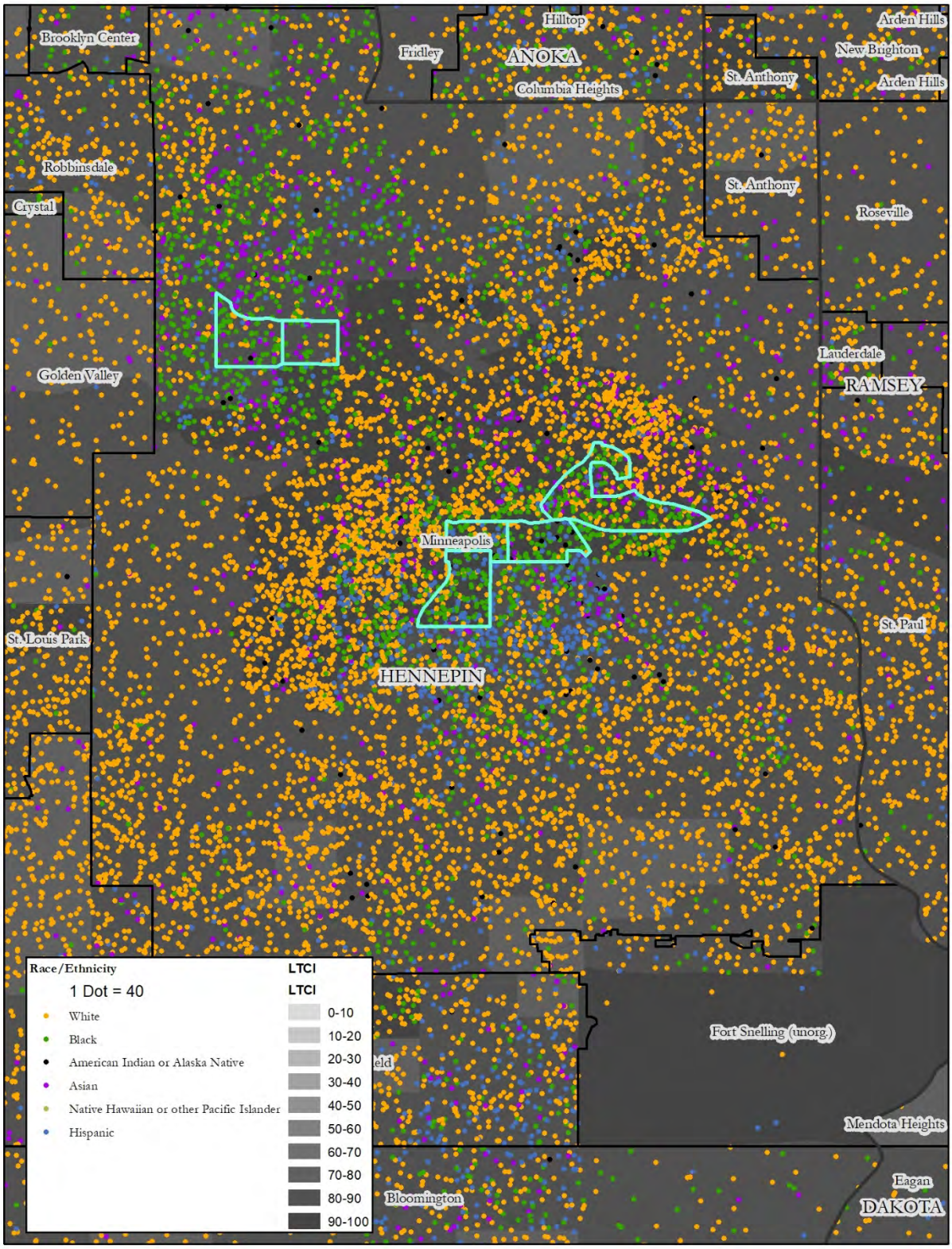
Map 11: Eden Prairie, Race, Low Transportation Cost Index



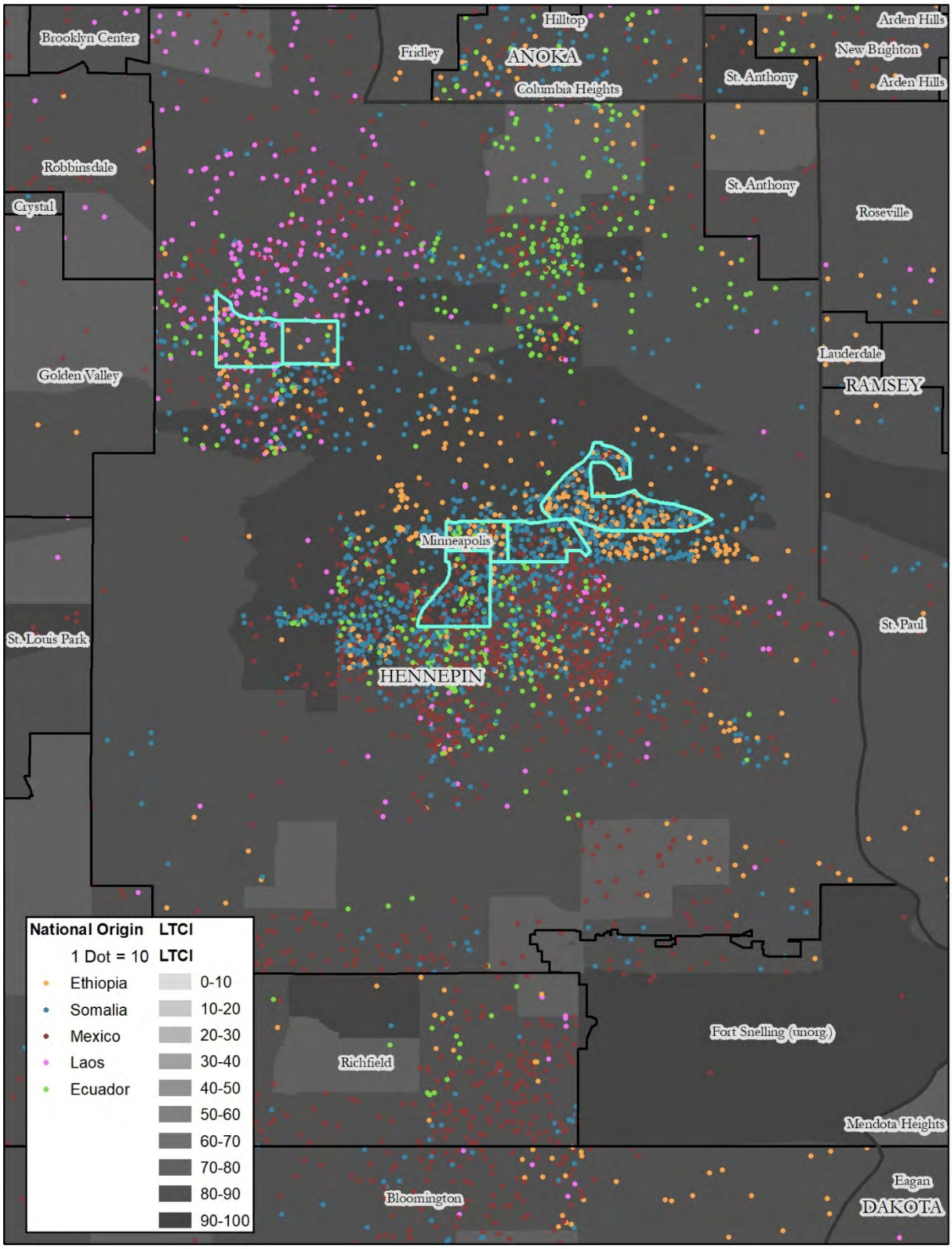
Map 12: Eden Prairie, National Origin, Low Transportation Cost Index



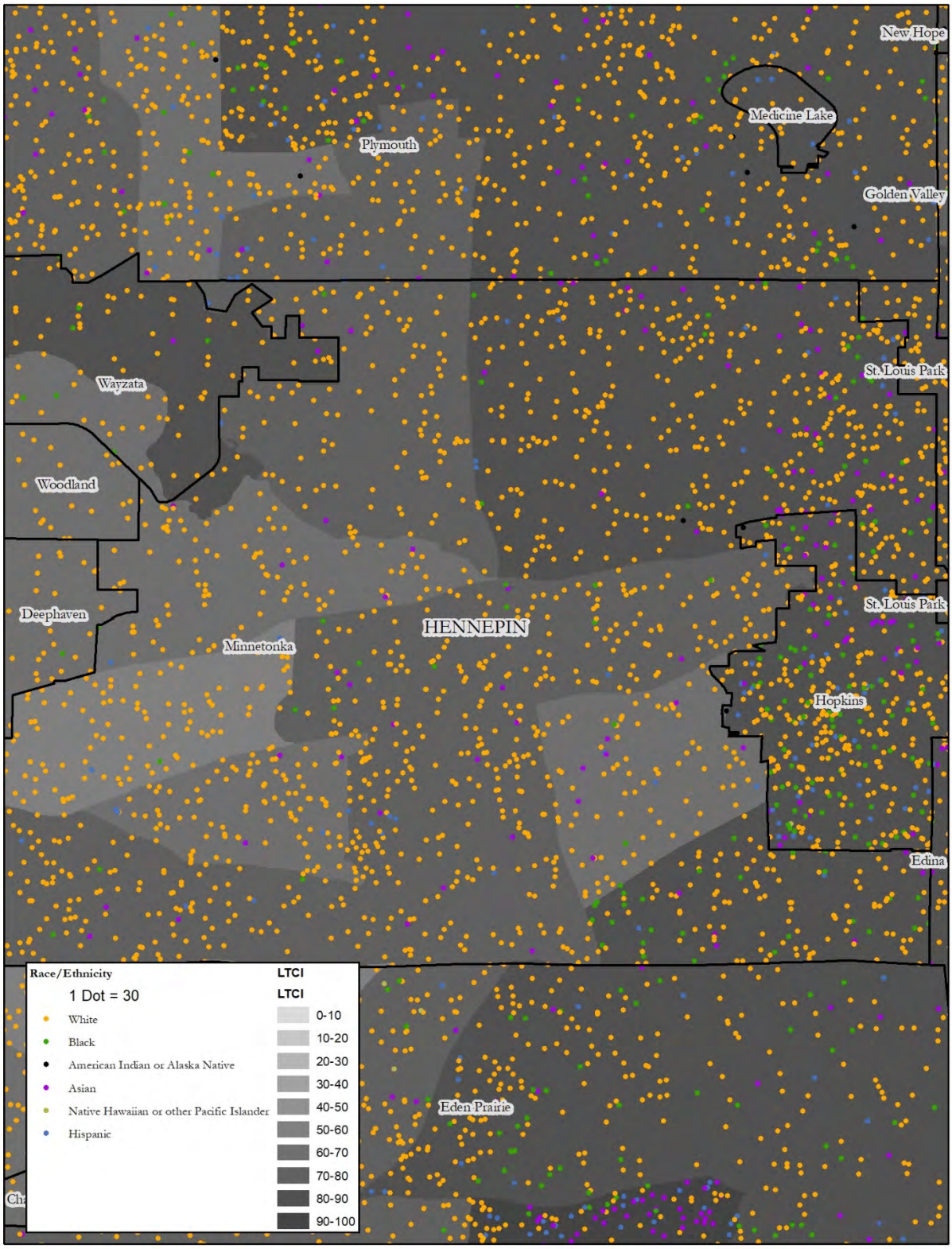
Map 13: Minneapolis, Race, Low Transportation Cost Index



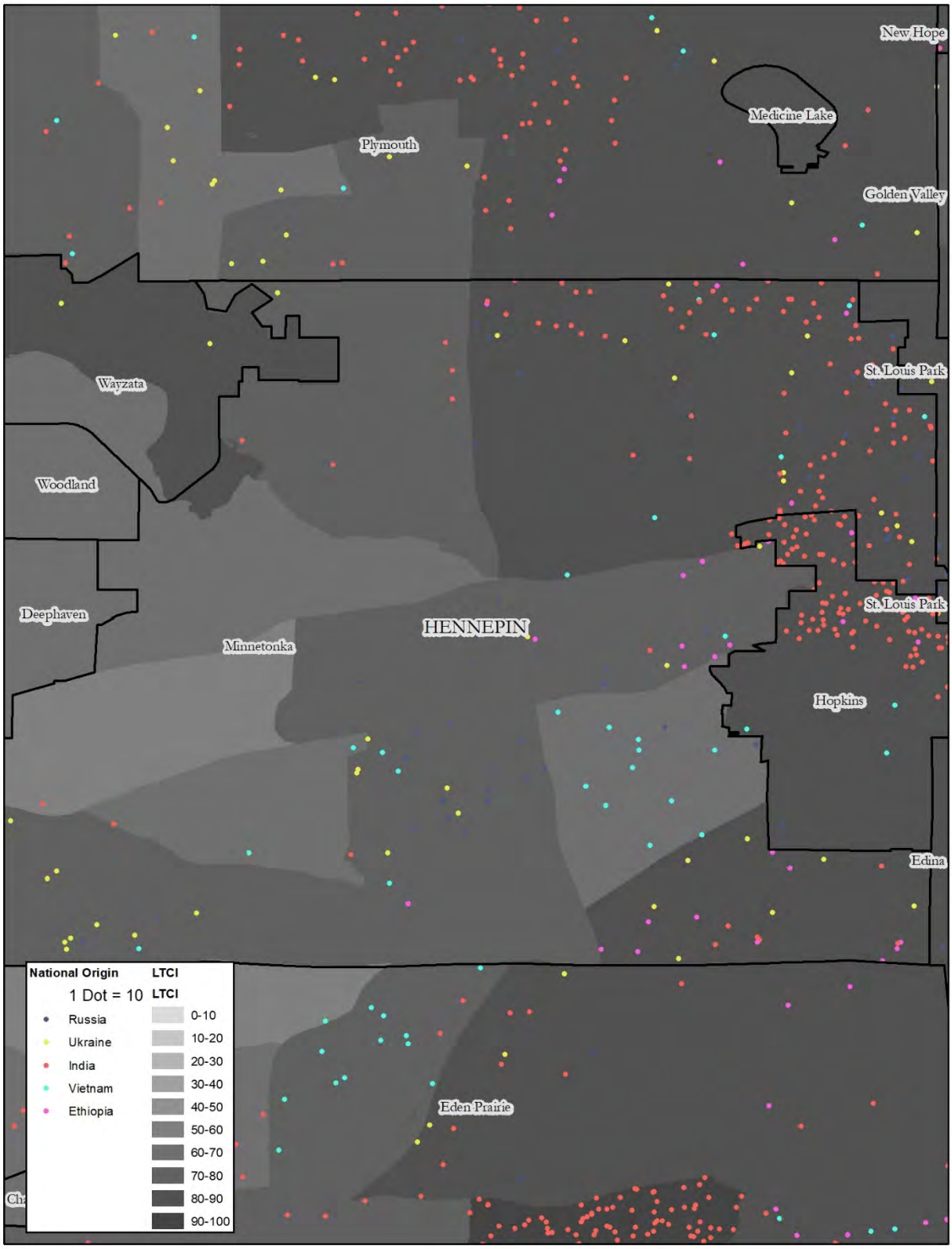
Map 14: Minneapolis, National Origin, Low Transportation Cost Index



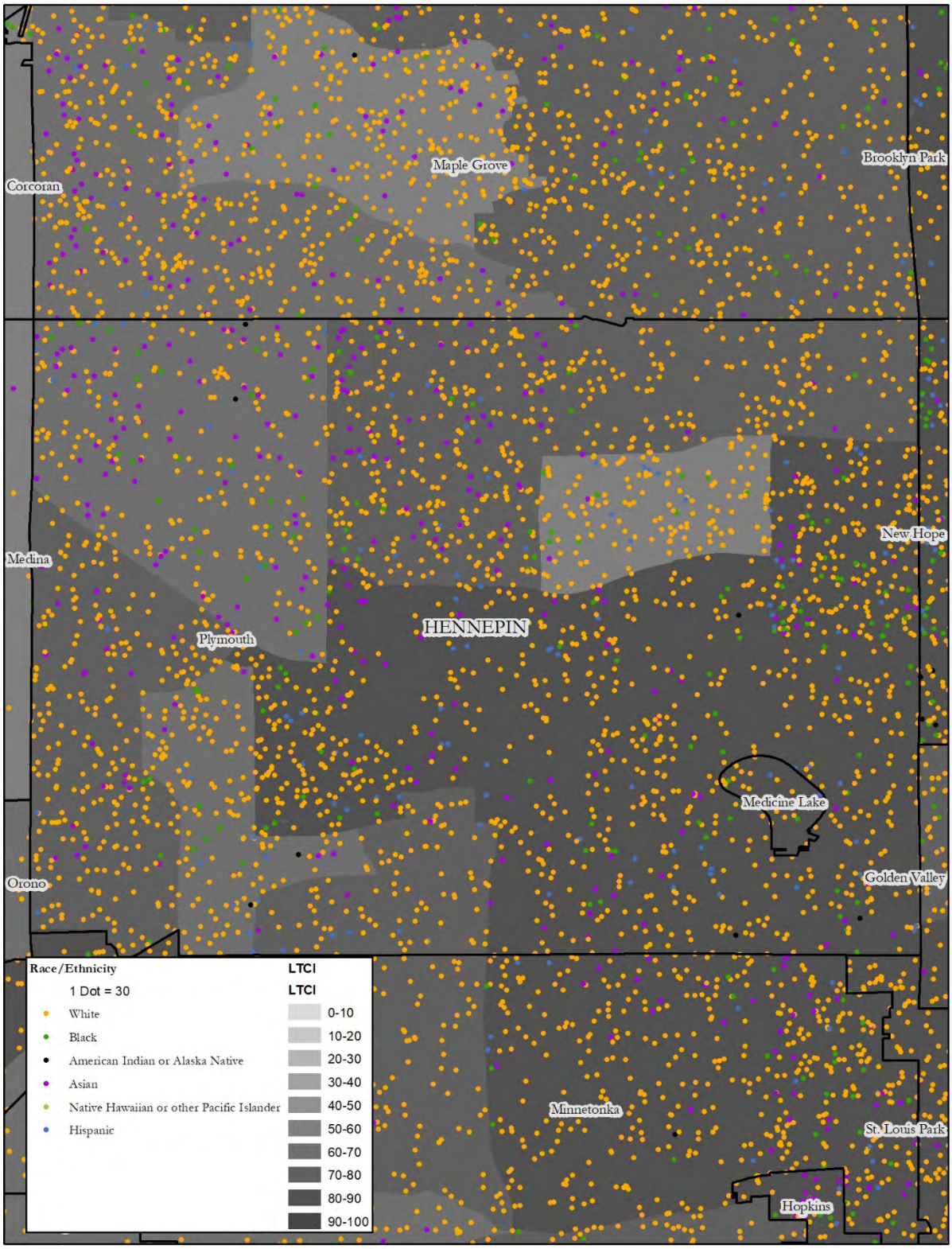
Map 15: Minnetonka, Race, Low Transportation Cost Index



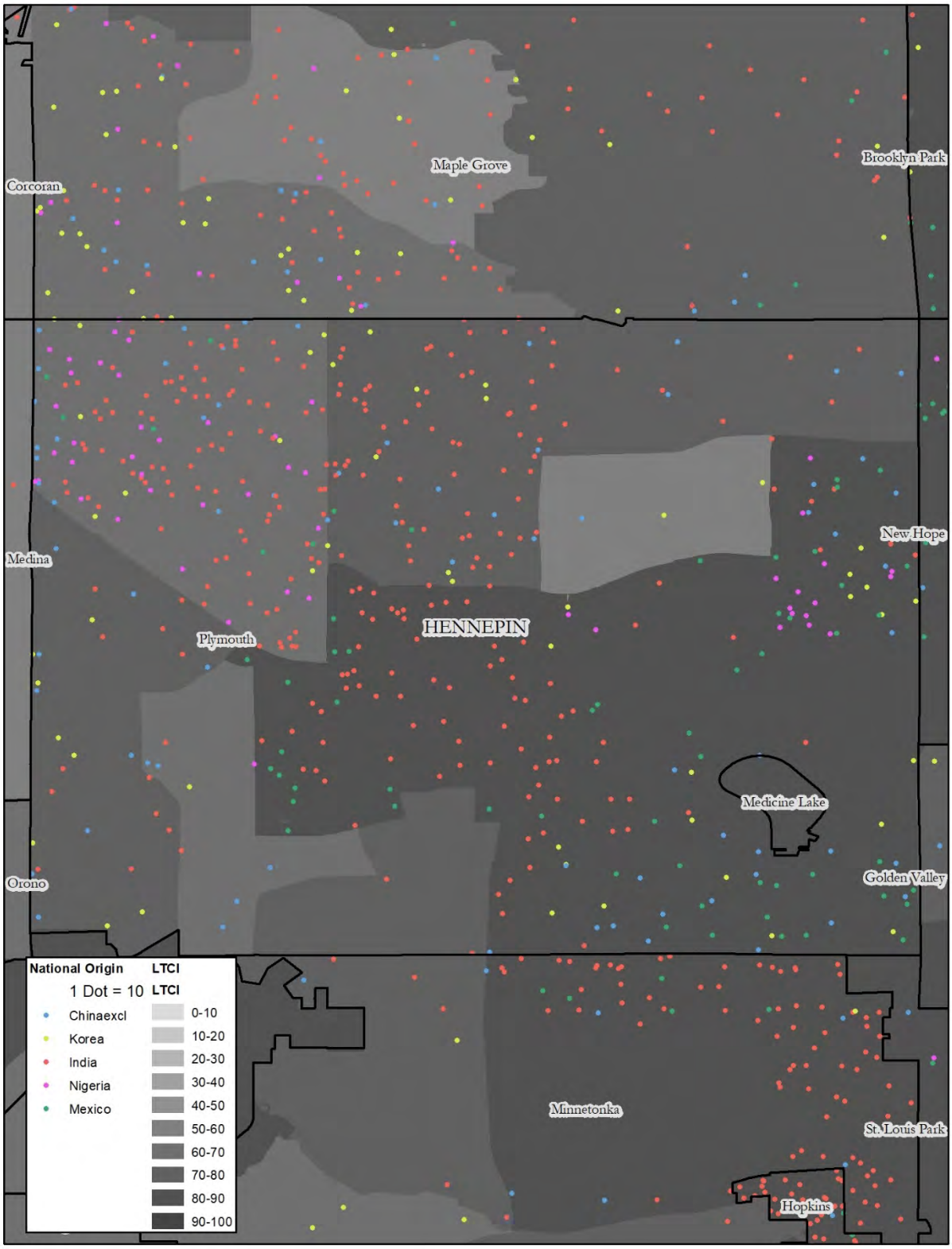
Map 16: Minnetonka, National Origin, Low Transportation Cost Index



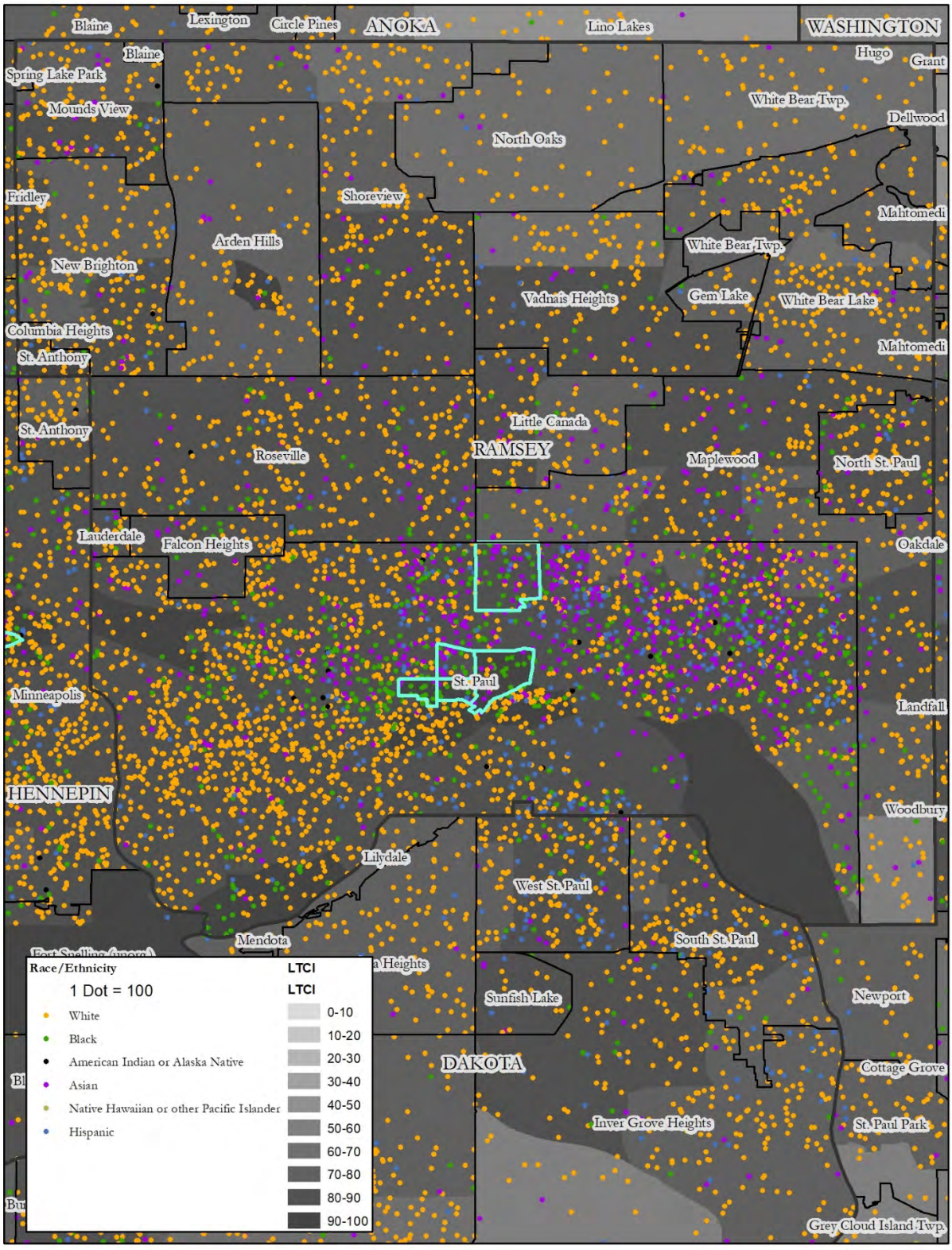
Map 17: Plymouth, Race, Low Transportation Cost Index



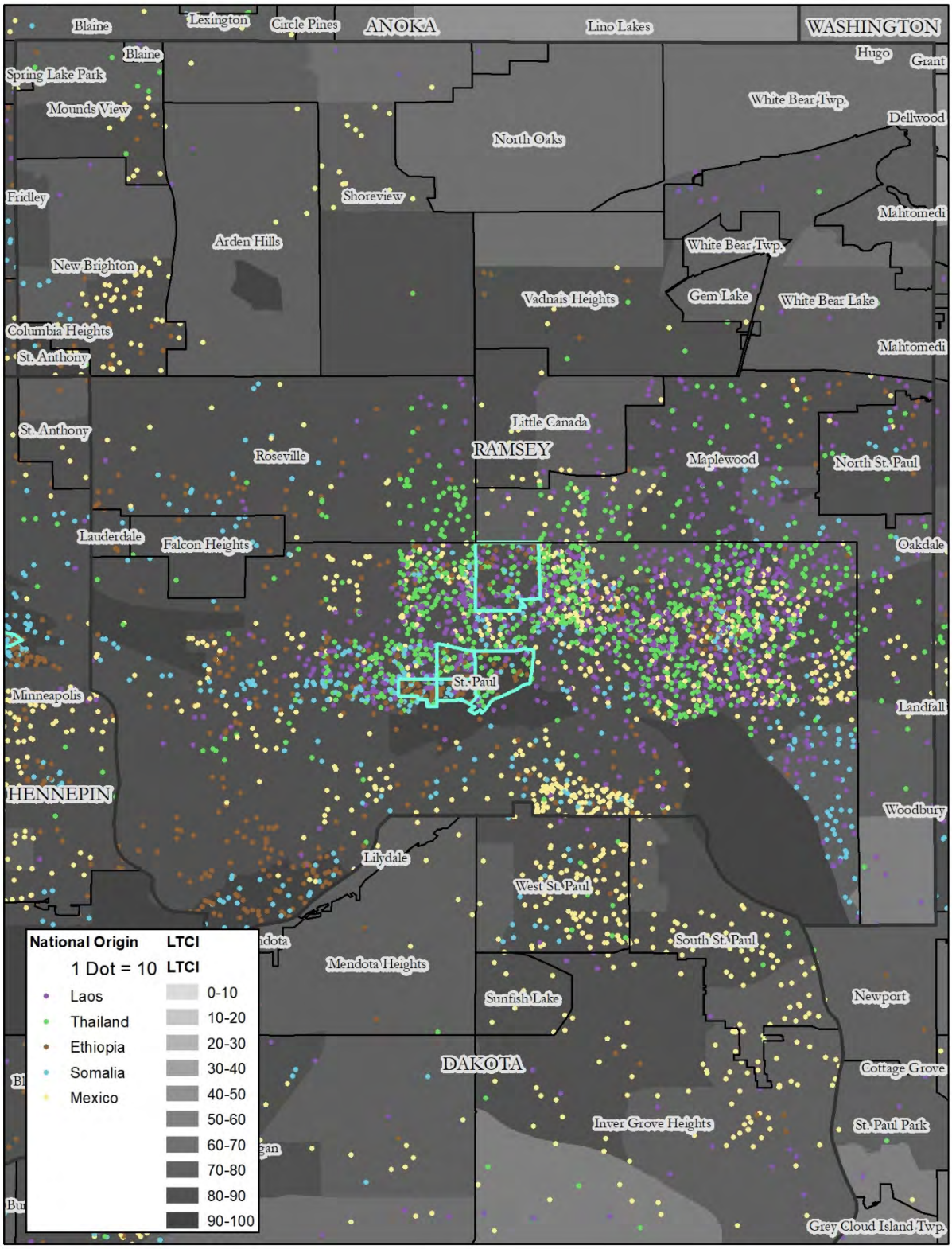
Map 18: Plymouth, National Origin, Low Transportation Cost Index



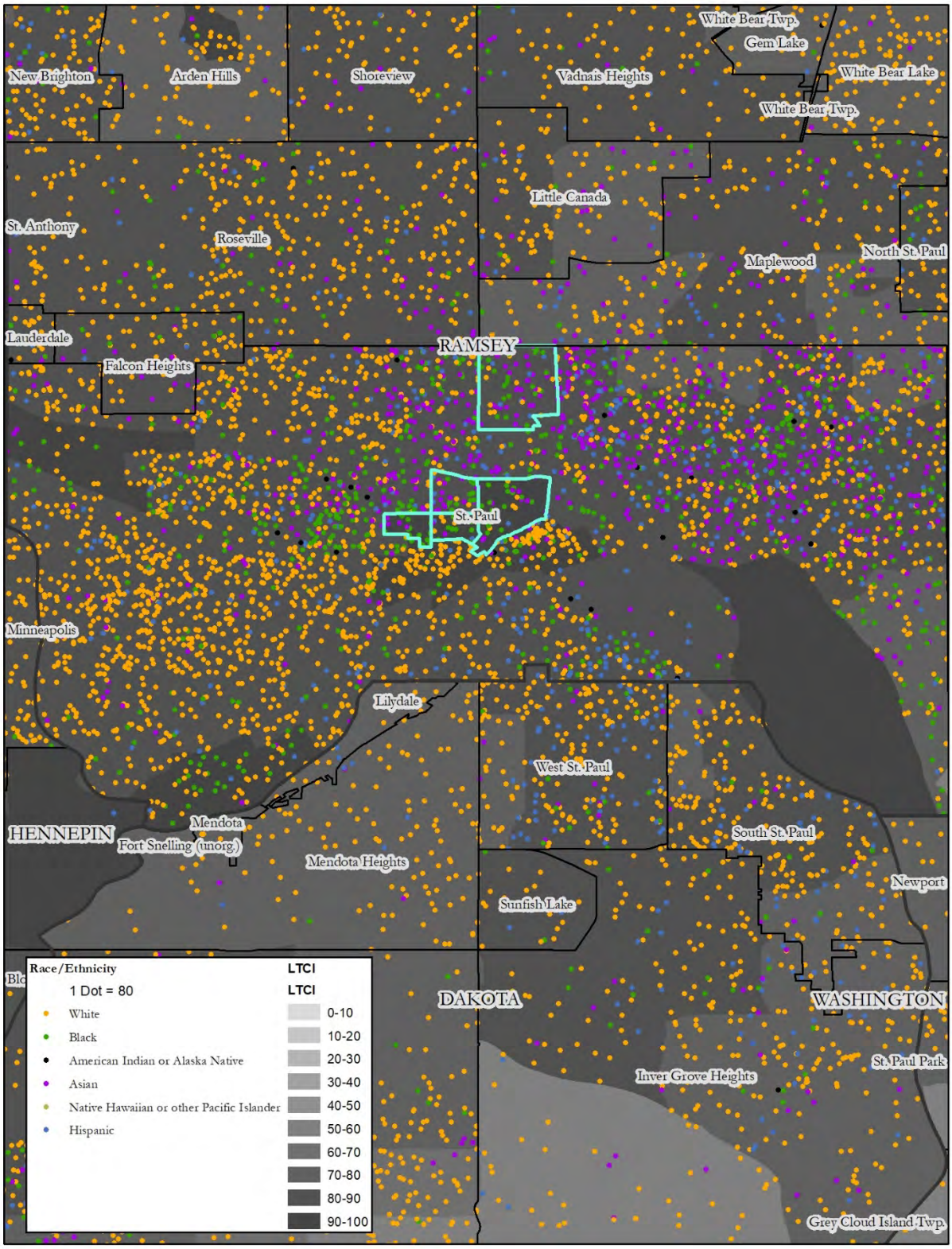
Map 19: Ramsey County, Race, Low Transportation Cost Index



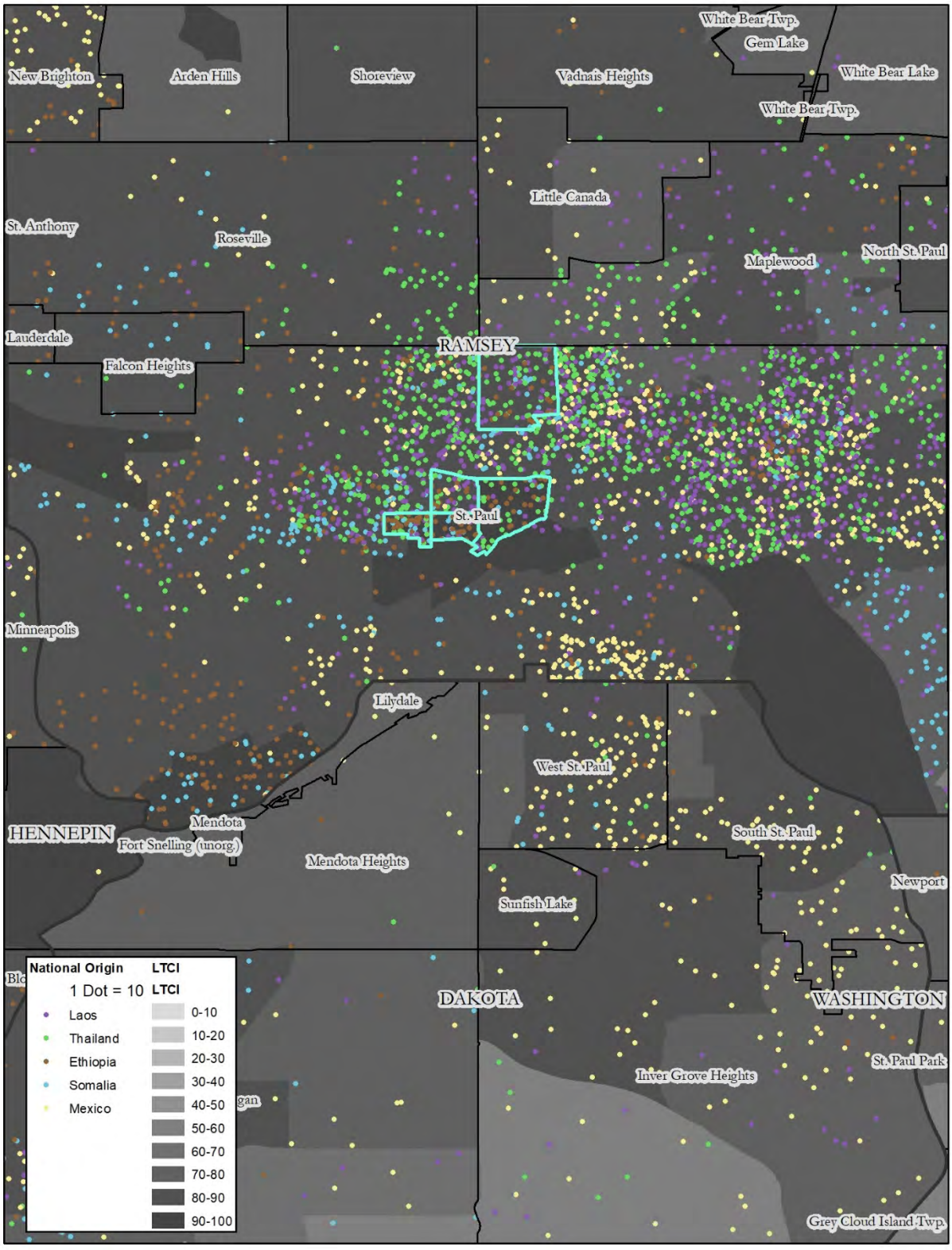
Map 20: Ramsey County, National Origin, Low Transportation Cost Index



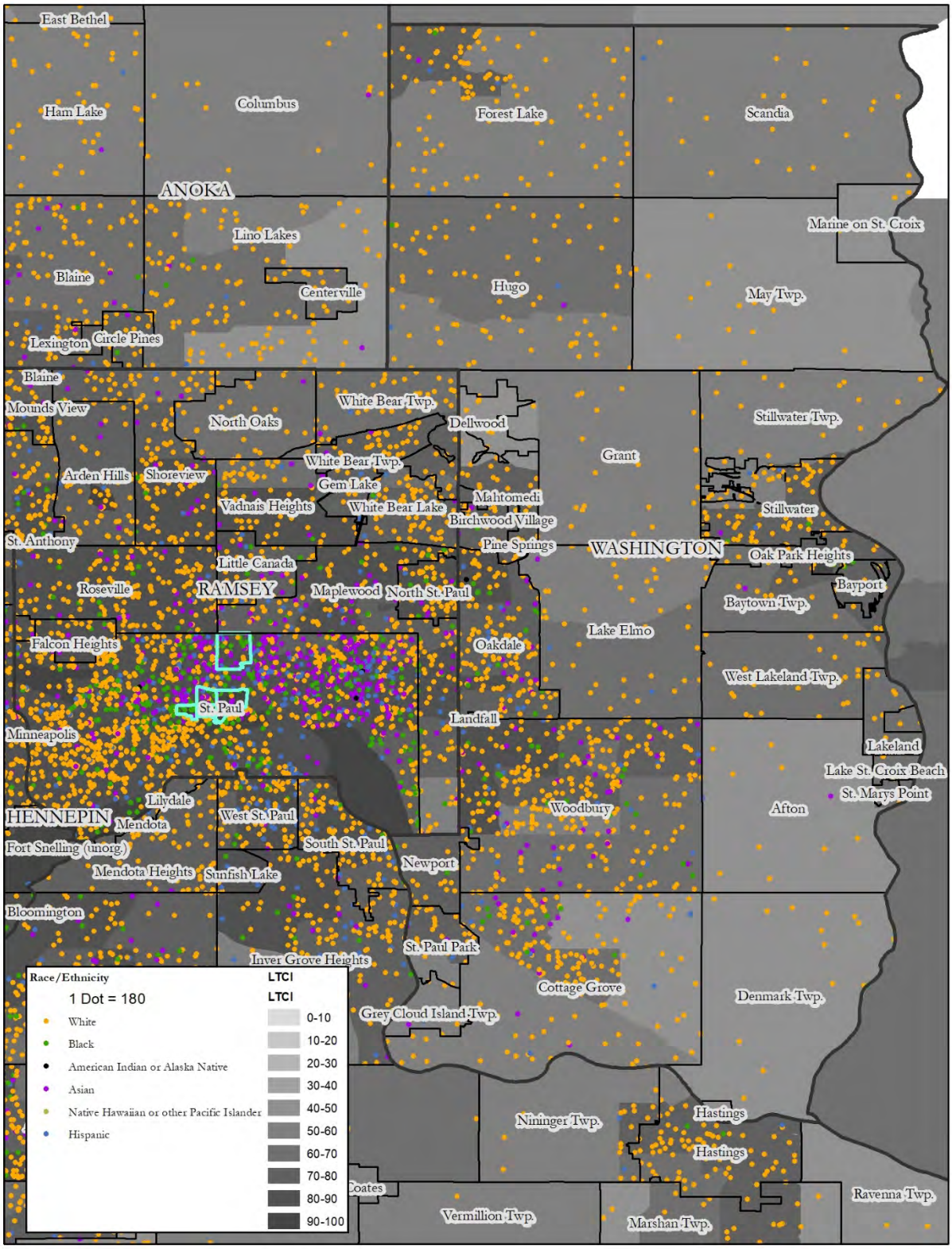
Map 21: St. Paul, Race, Low Transportation Cost Index



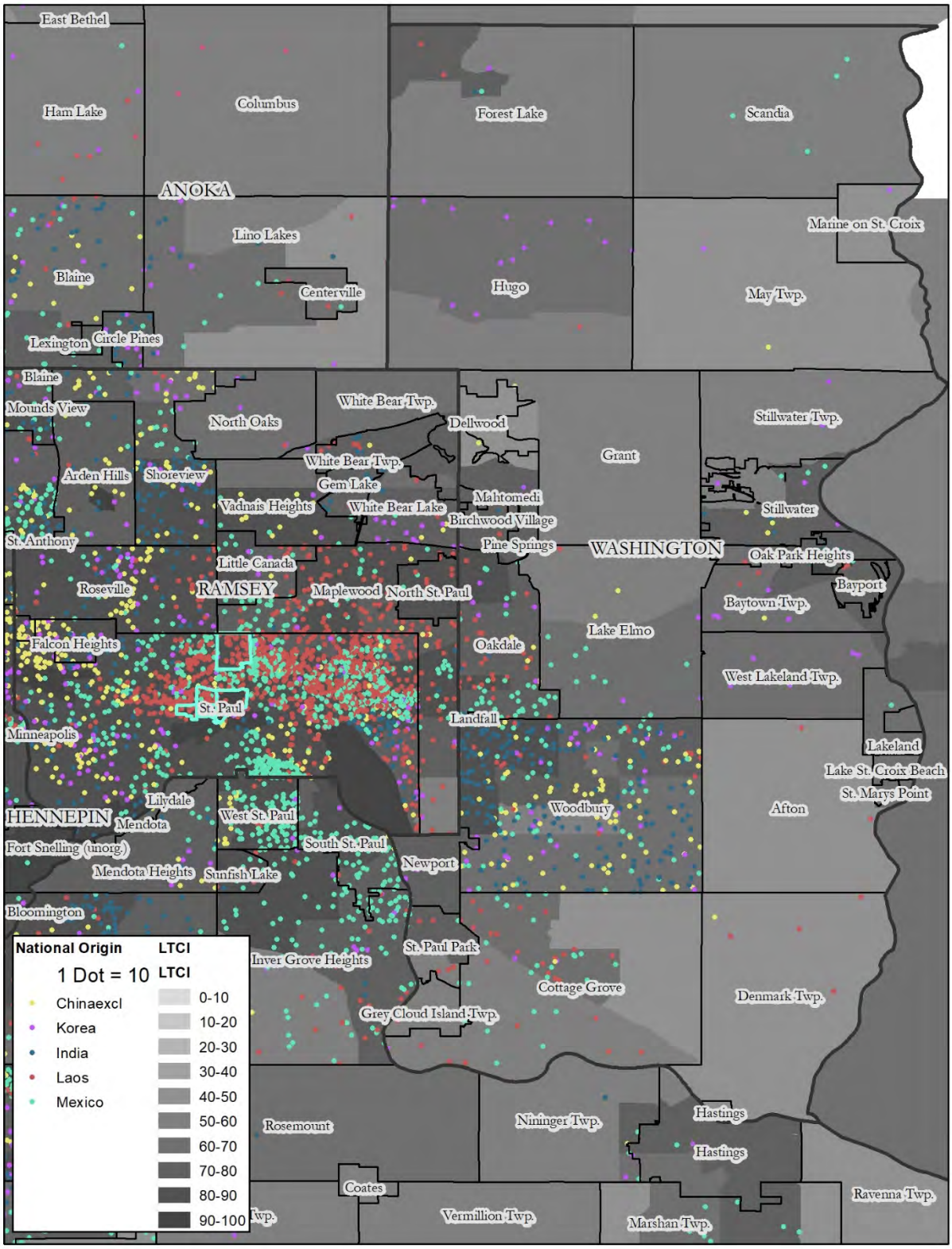
Map 22: St. Paul, National Origin, Low Transportation Cost Index



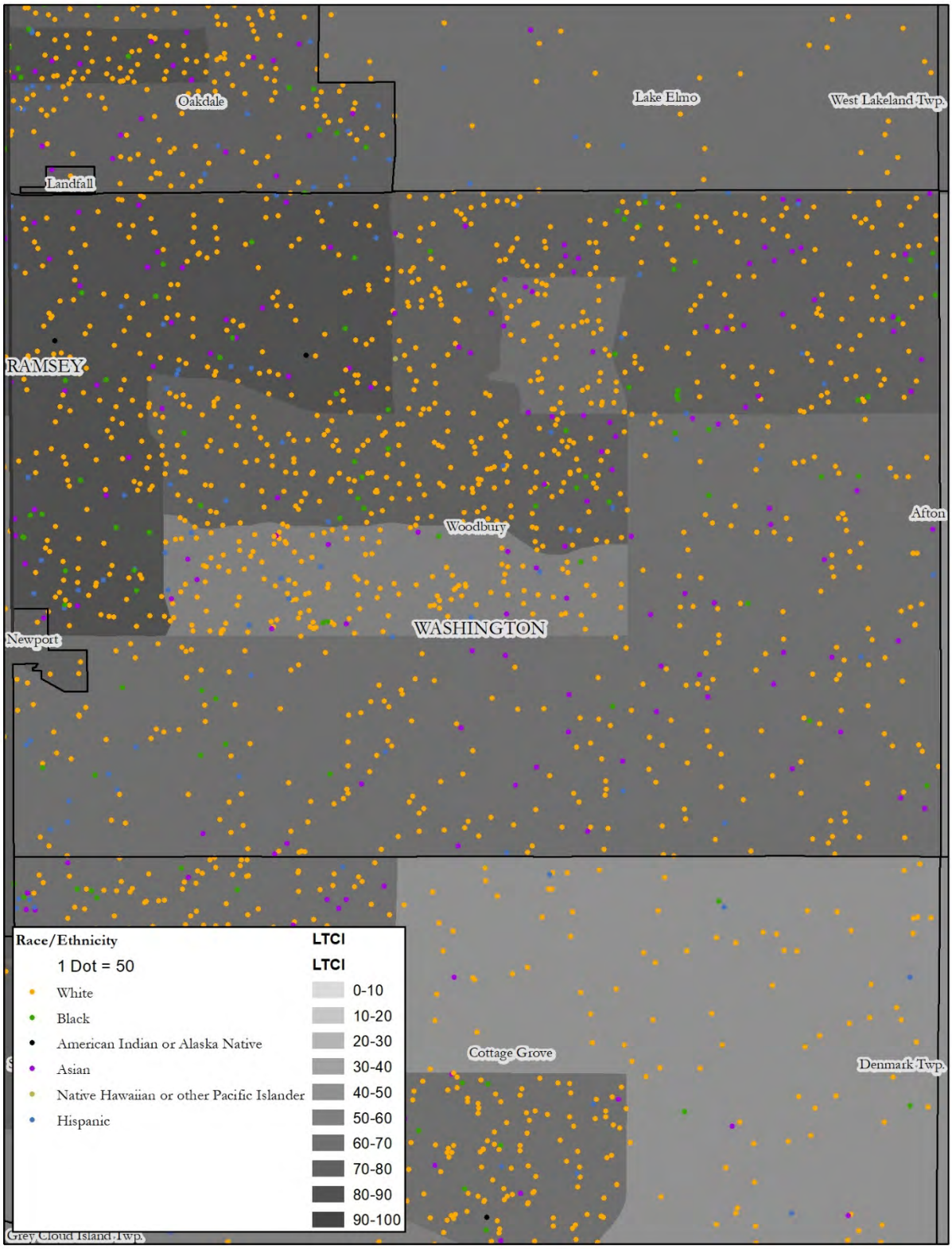
Map 23: Washington County, Race, Low Transportation Cost Index



Map 24: Washington County, National Origin, Low Transportation Cost Index

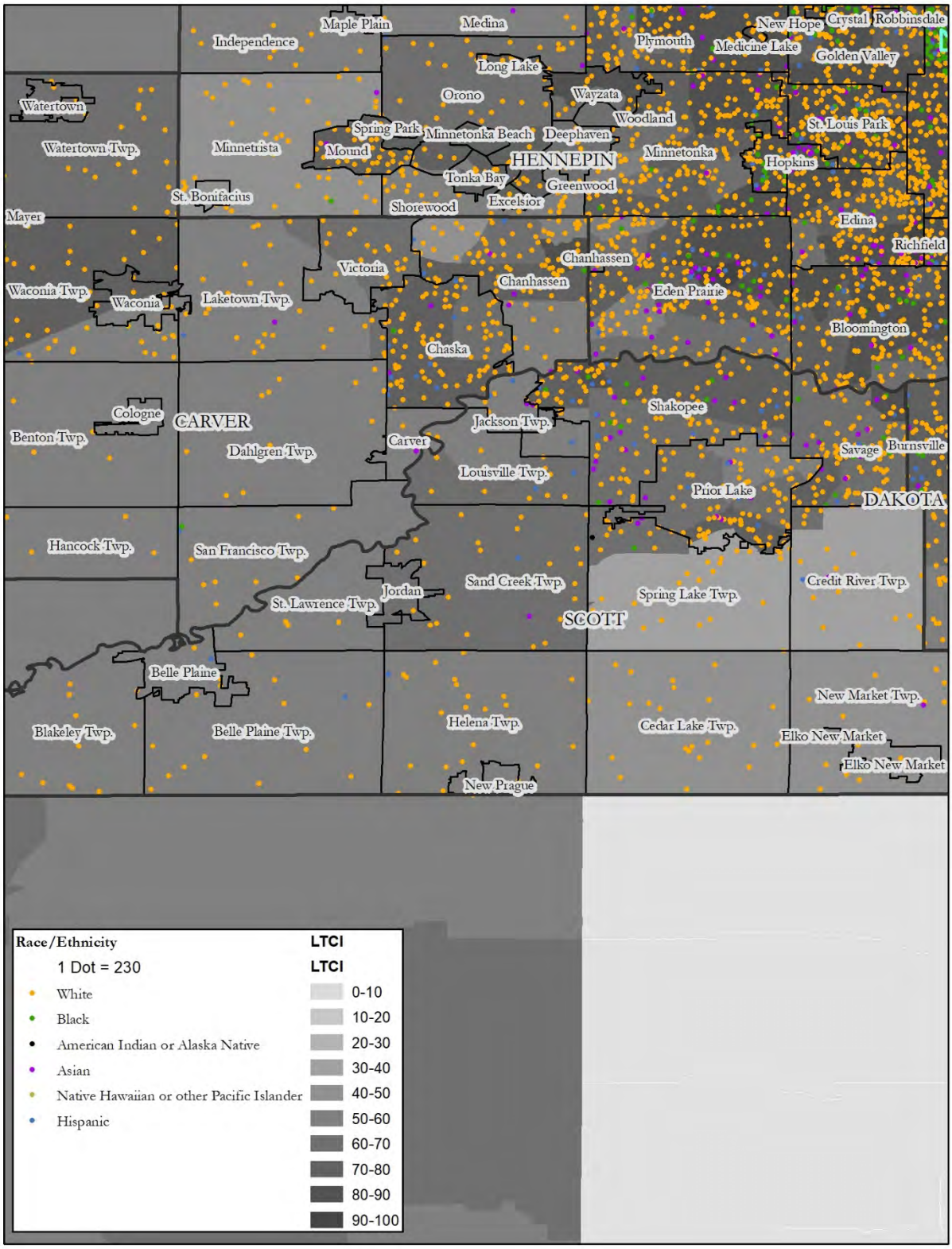


Map 25: Woodbury, Race, Low Transportation Cost Index

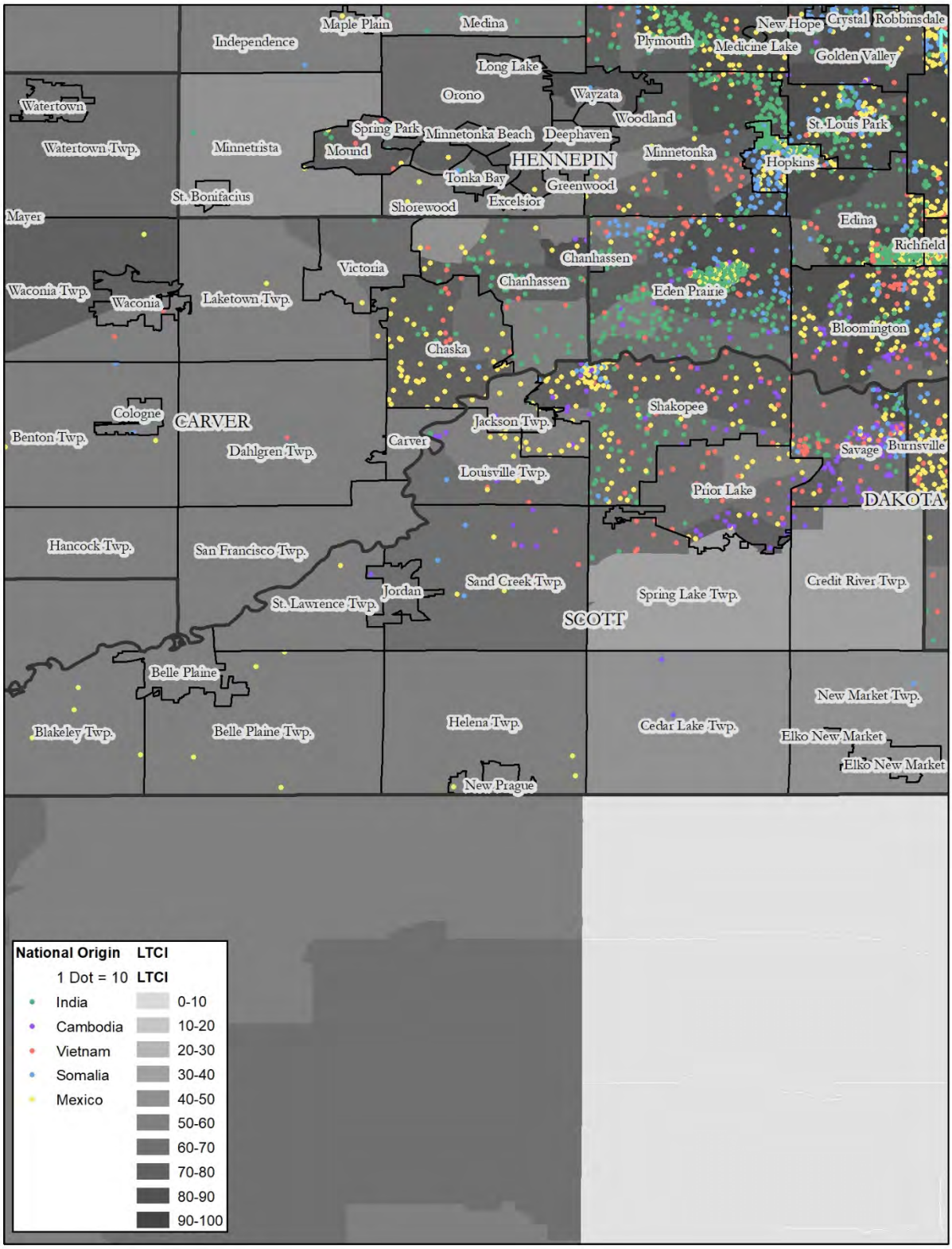


Map 26: Woodbury, National Origin, Low Transportation Cost Index

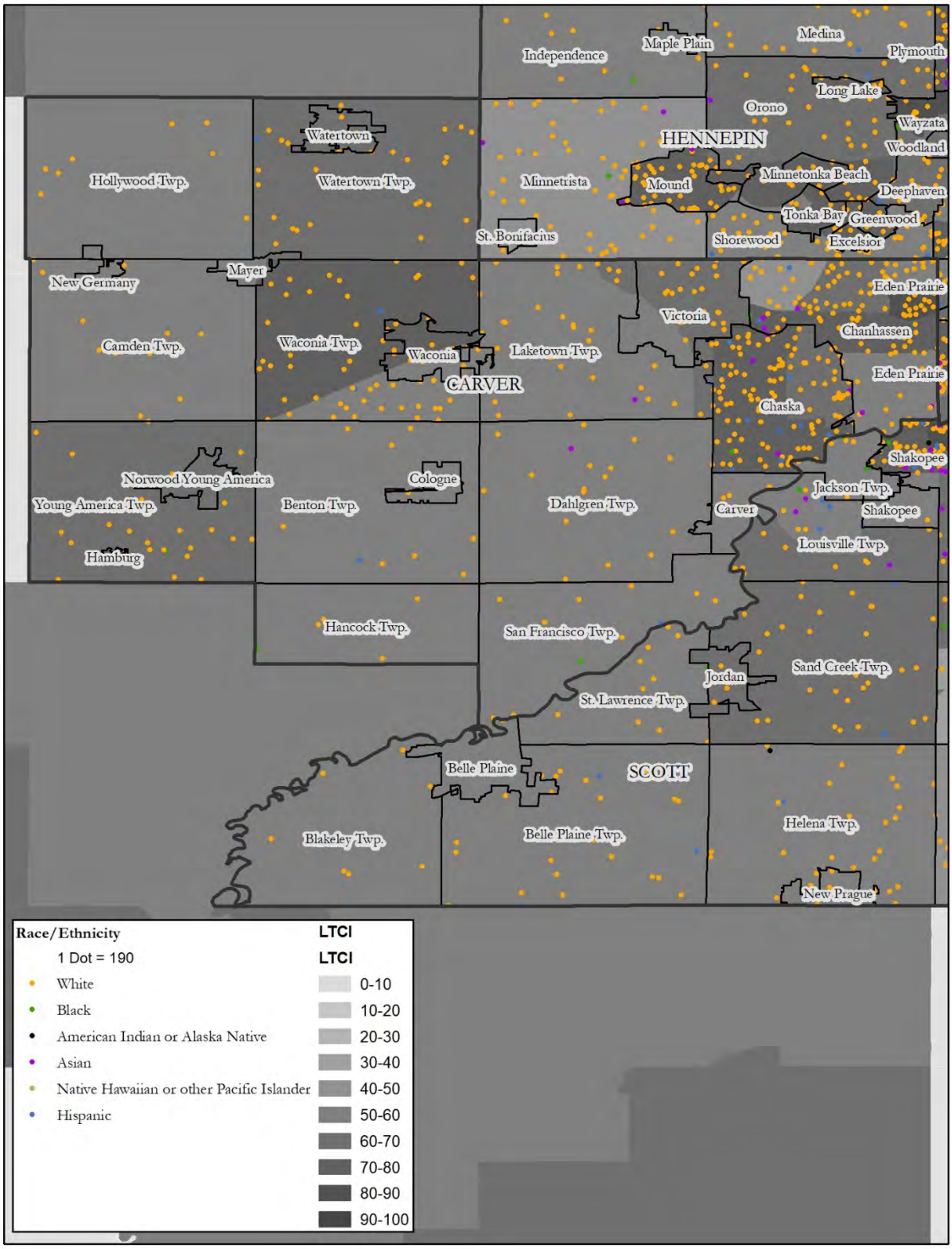
Map 27: Scott County, Race, Low Transportation Cost Index



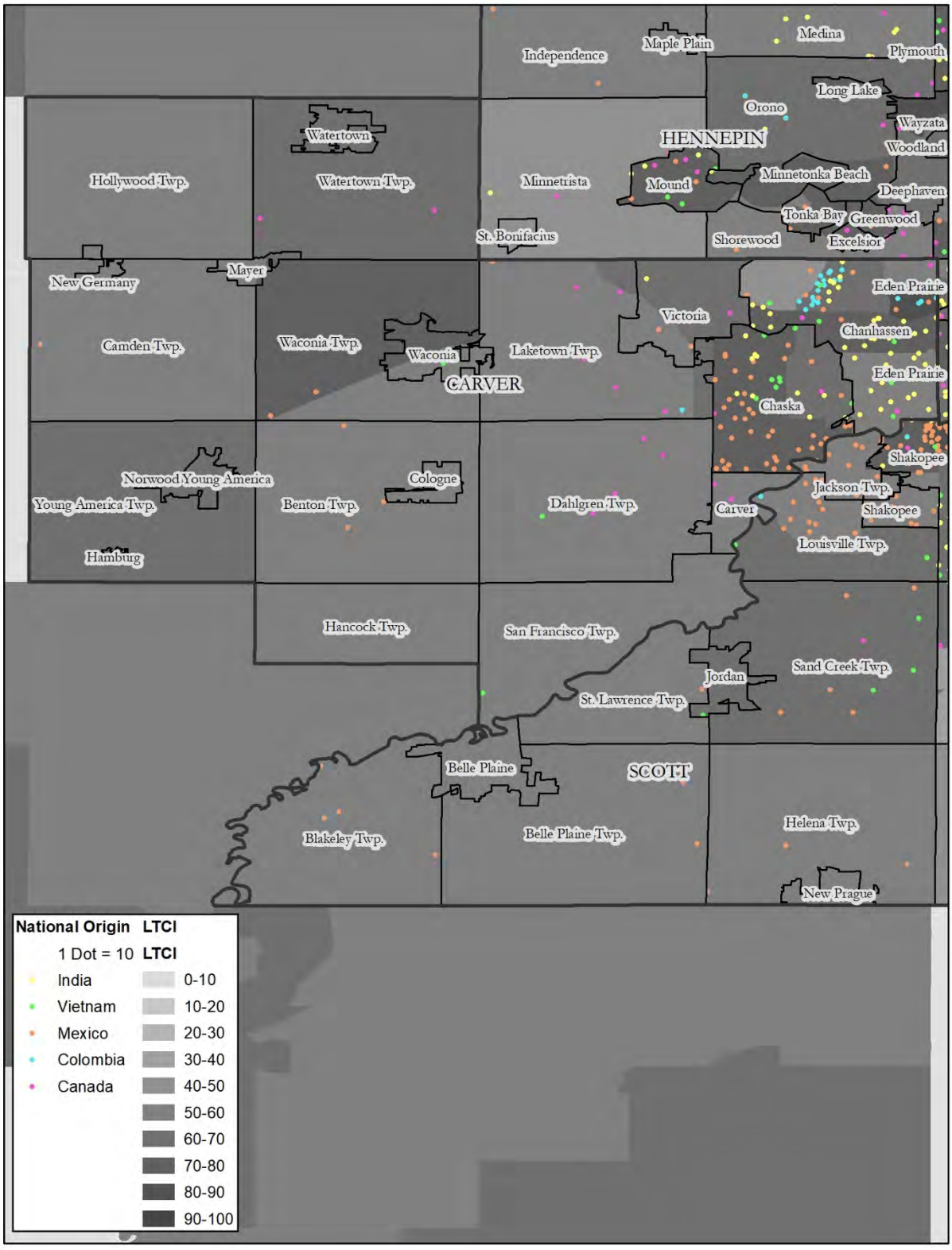
Map 28: Scott County, National Origin, Low Transportation Cost Index



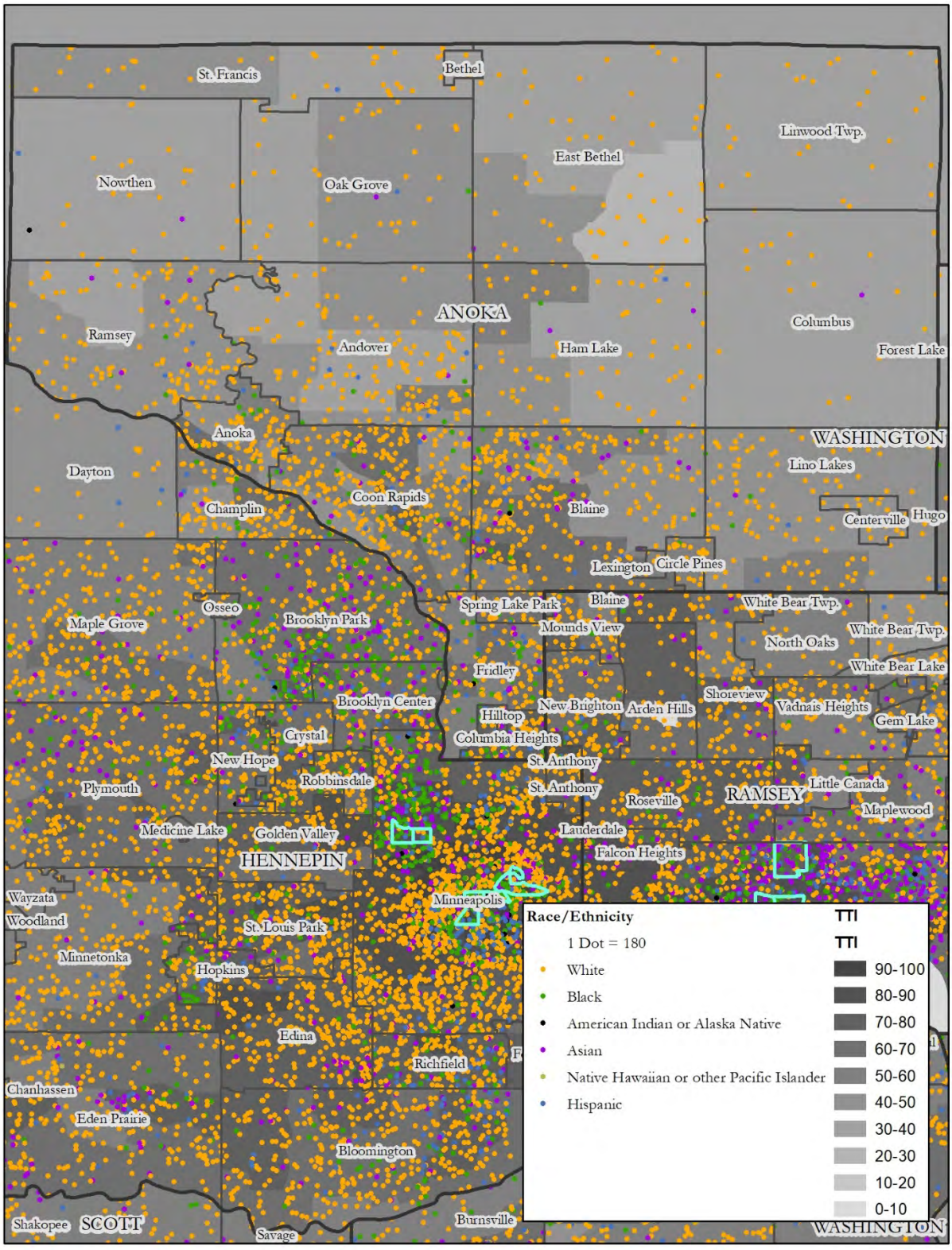
Map 29: Carver County, Race, Low Transportation Cost Index



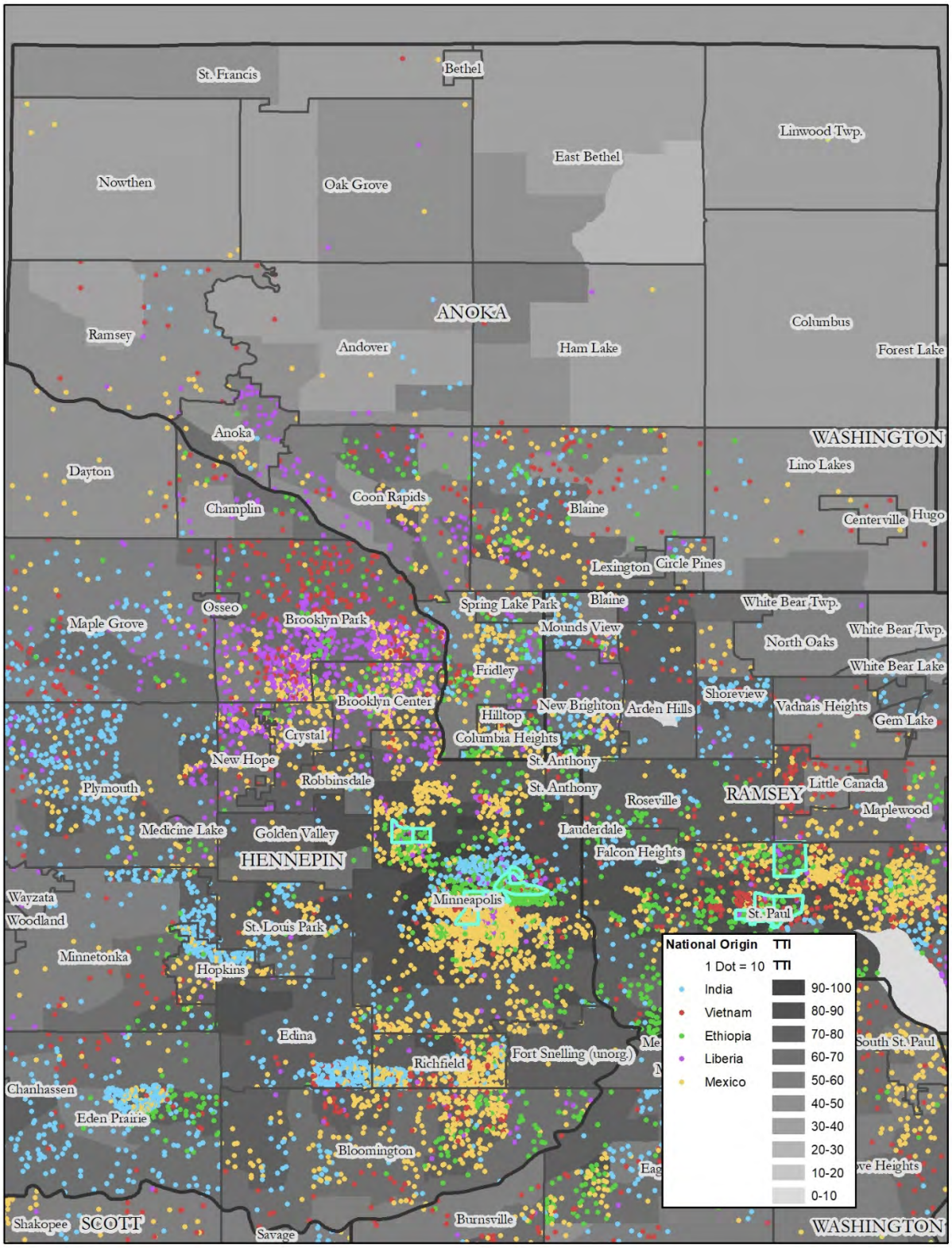
Map 30: Carver County, National Origin, Low Transportation Cost Index



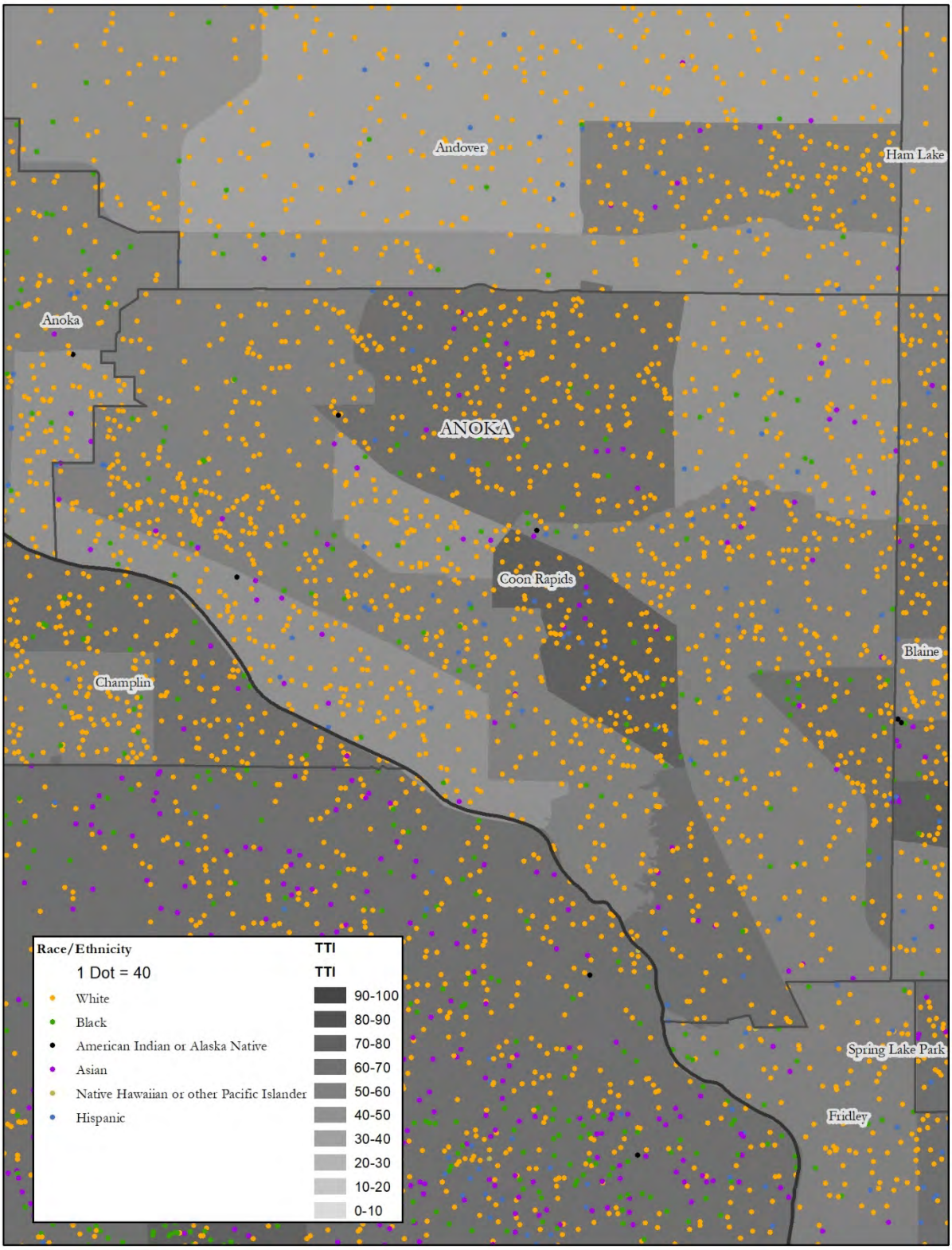
Map 31: Anoka County, Race, Transit Trips Index



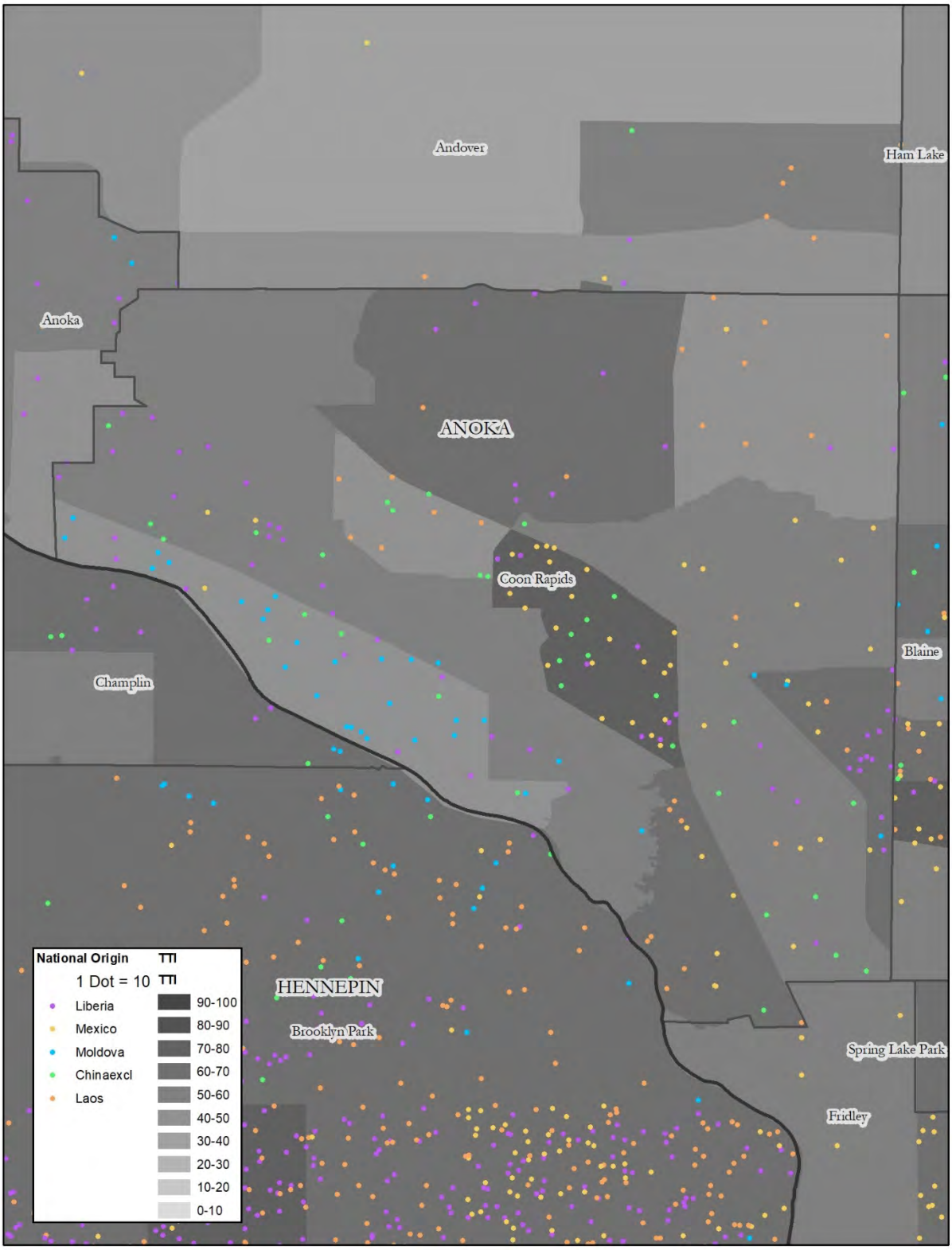
Map 32: Anoka County, National Origin, Transit Trips Index



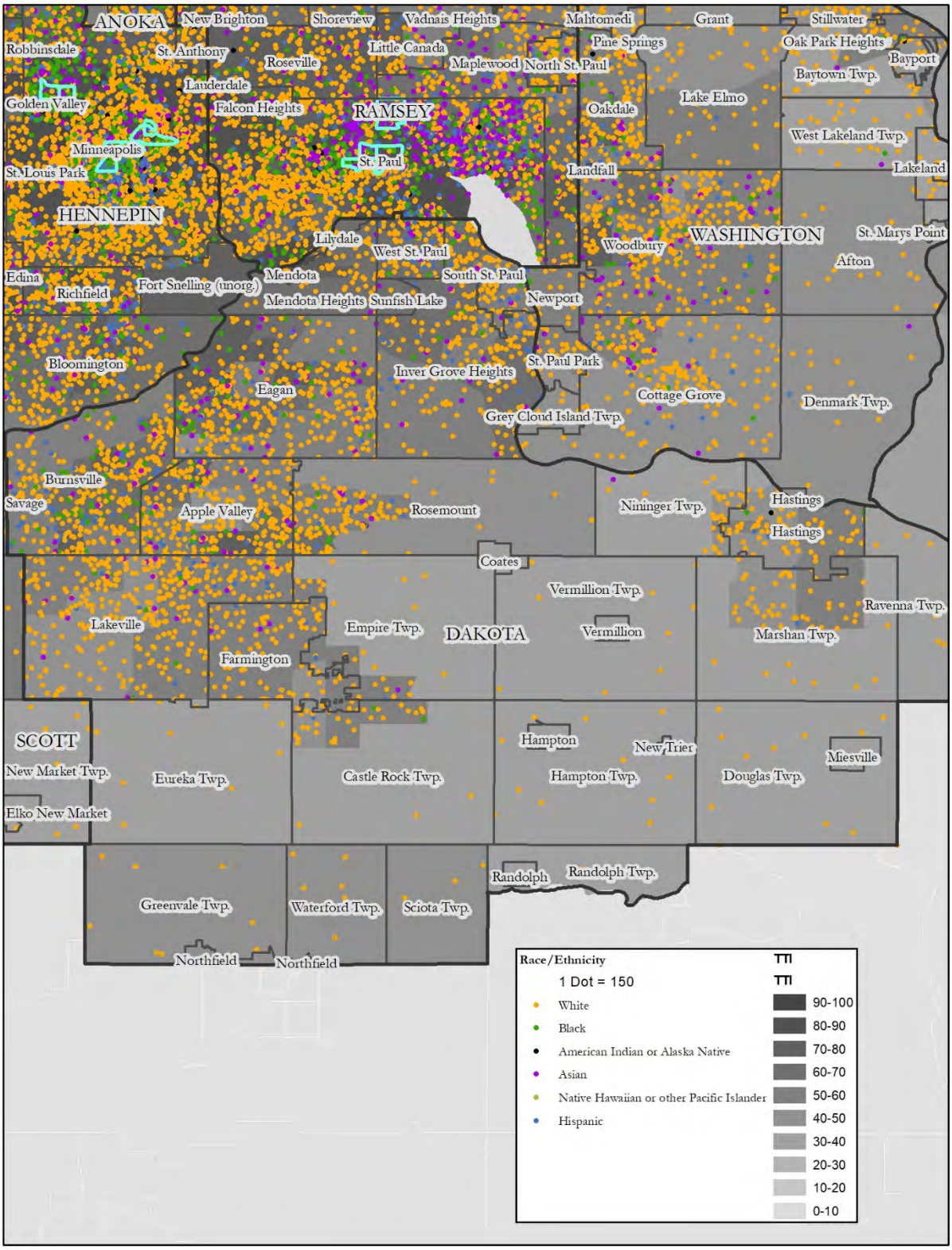
Map 33: Coon Rapids, Race, Transit Trips Index



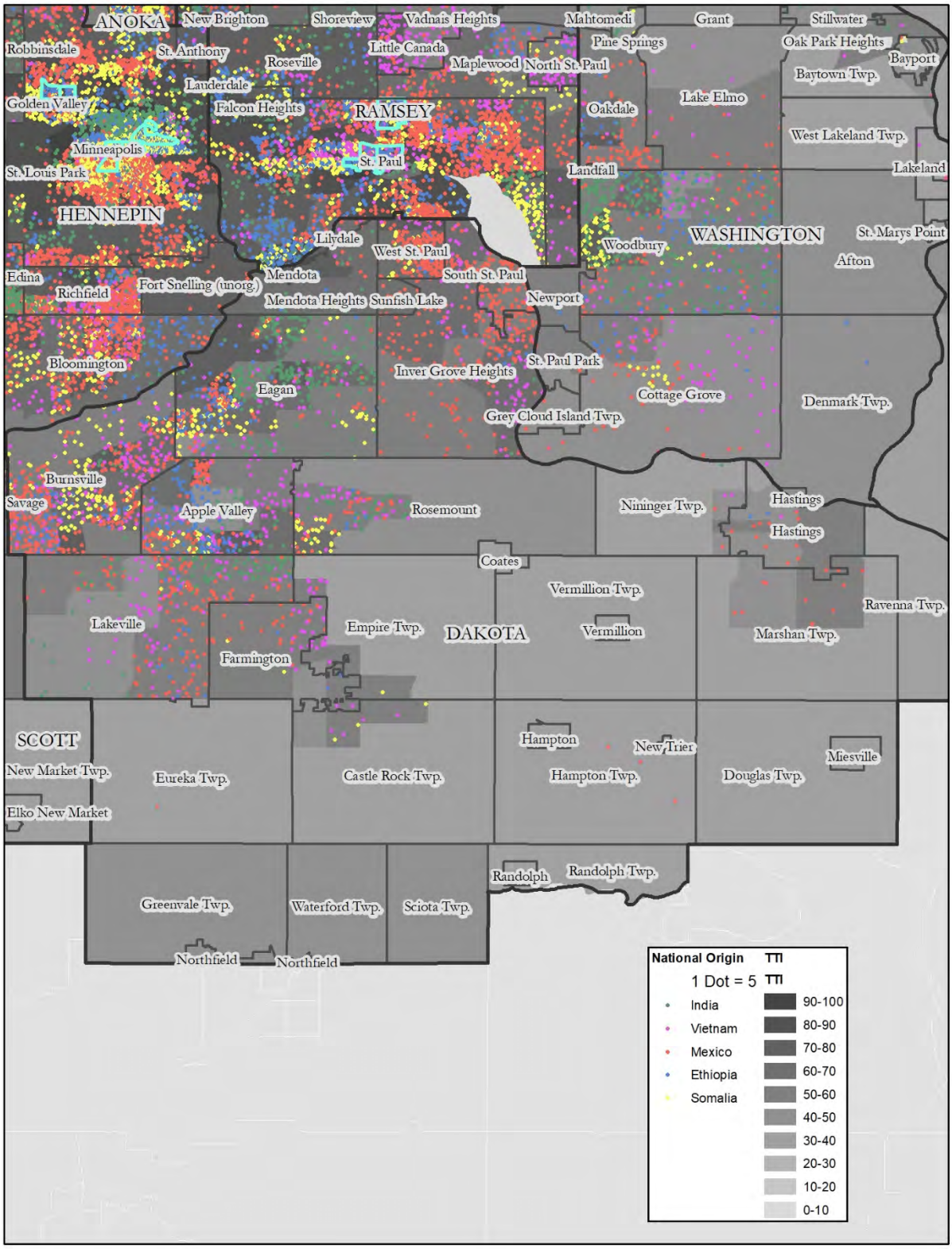
Map 34: Coon Rapids, National Origin, Transit Trips Index



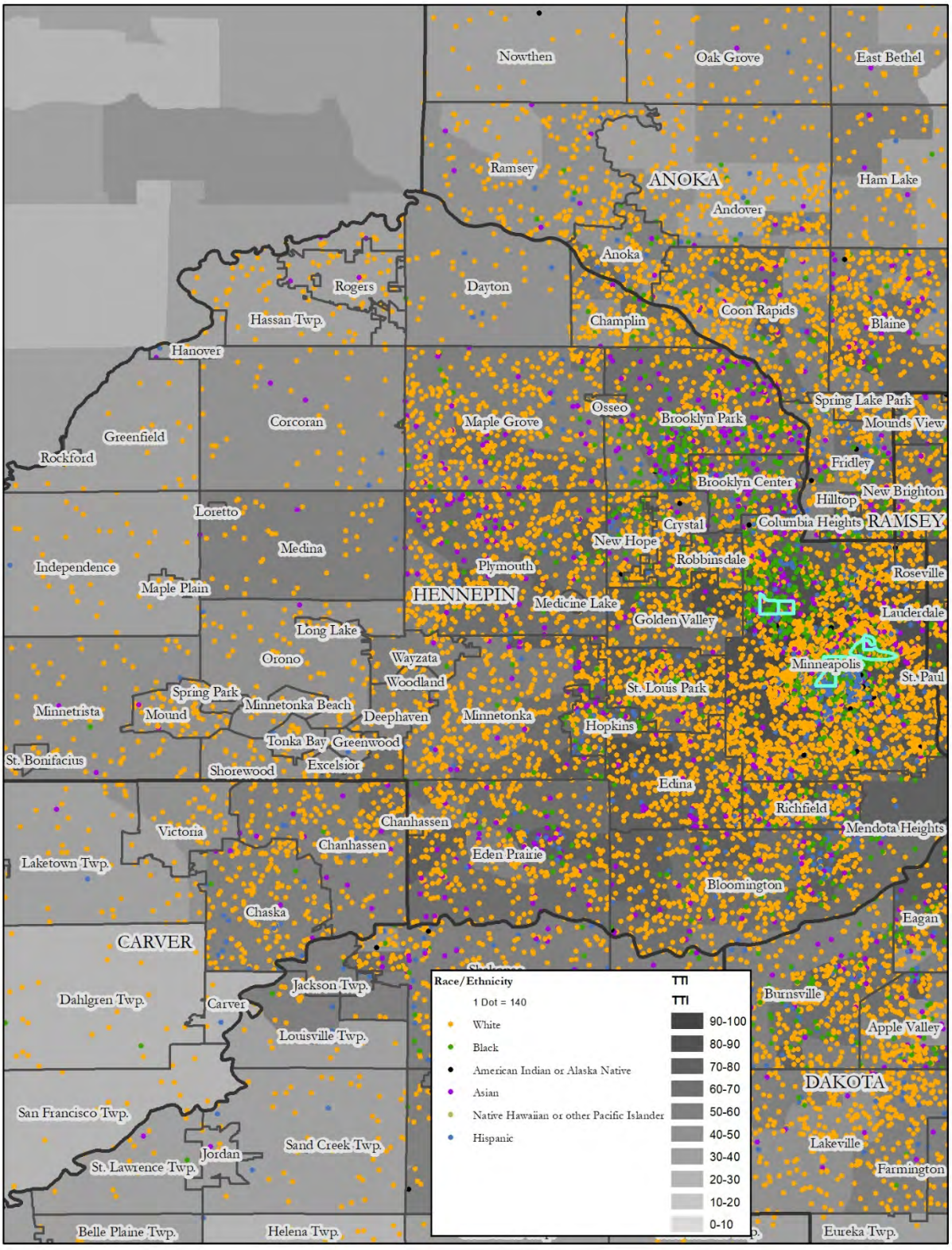
Map 35: Dakota County, Race, Transit Trips Index



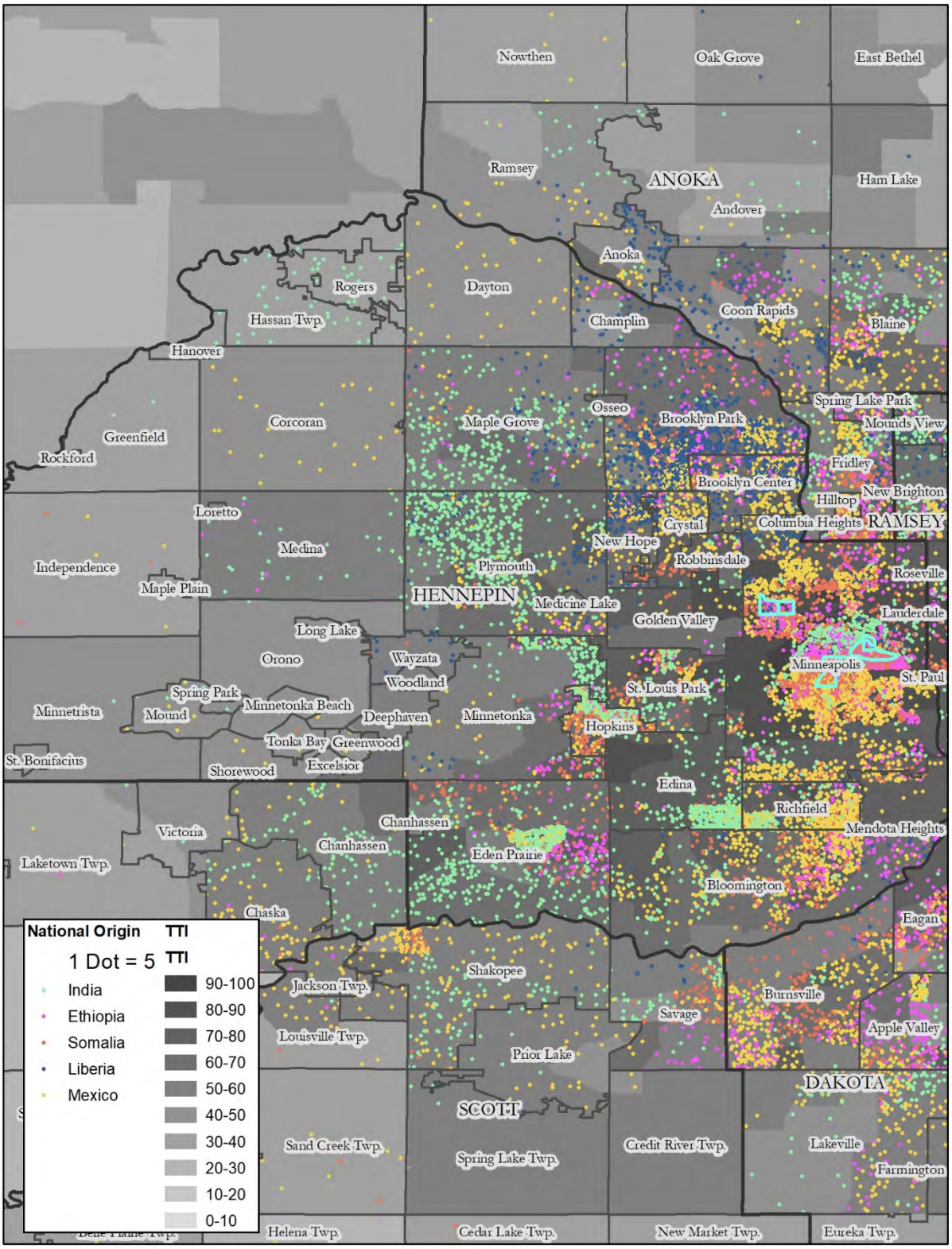
Map 36: Dakota County, National Origin, Transit Trips Index



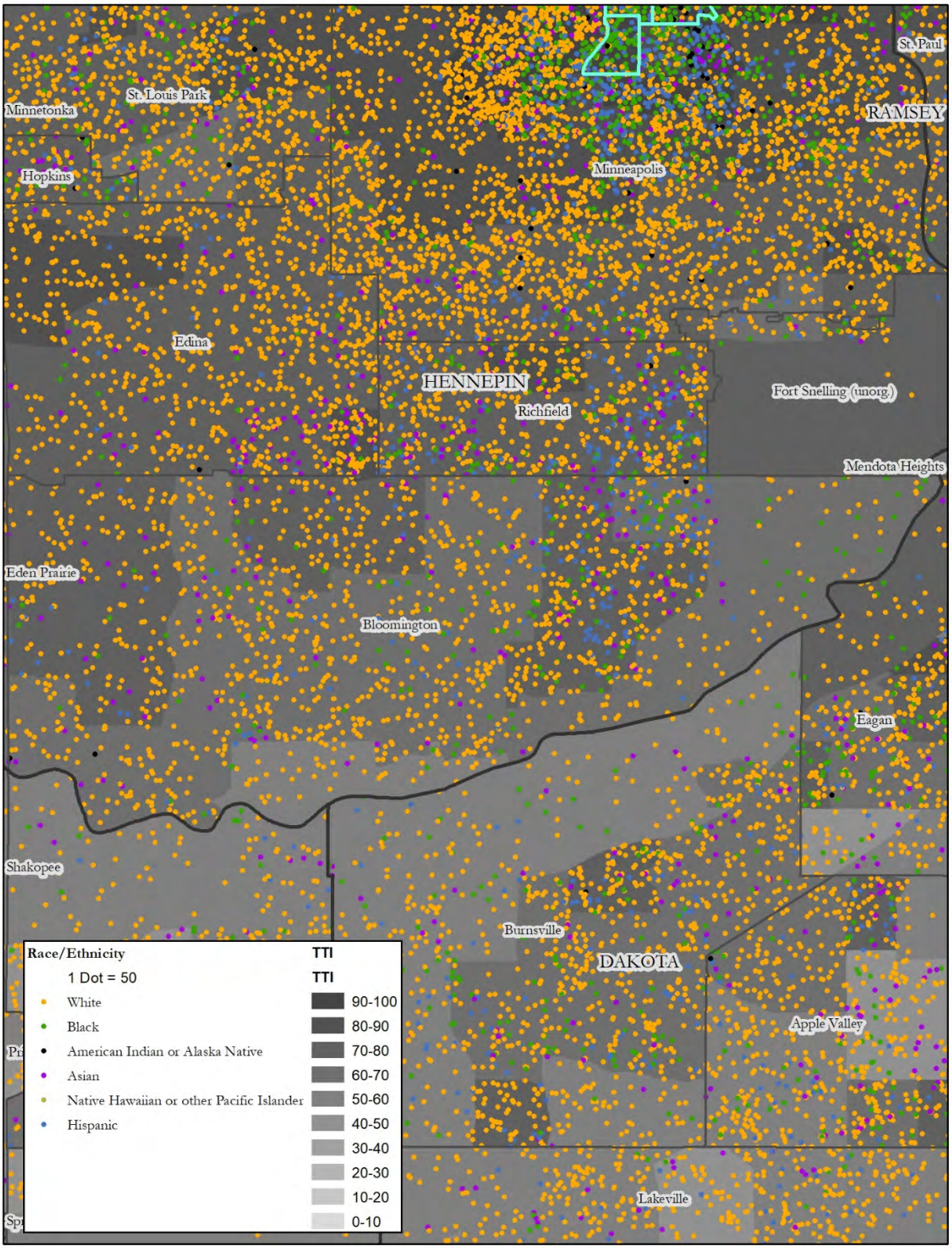
Map 37: Hennepin County, Race, Transit Trips Index



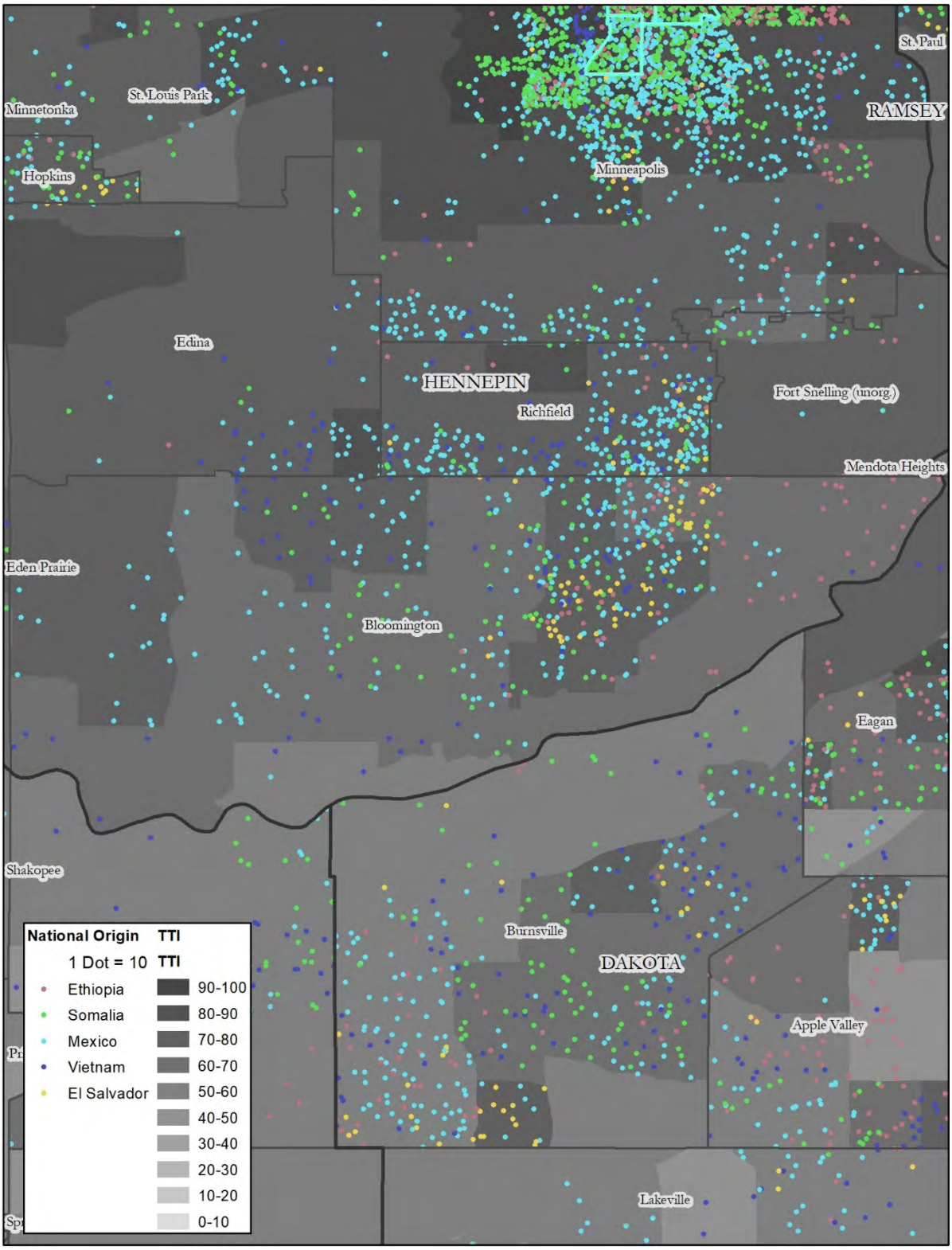
Map 38: Hennepin County, National Origin, Transit Trips Index



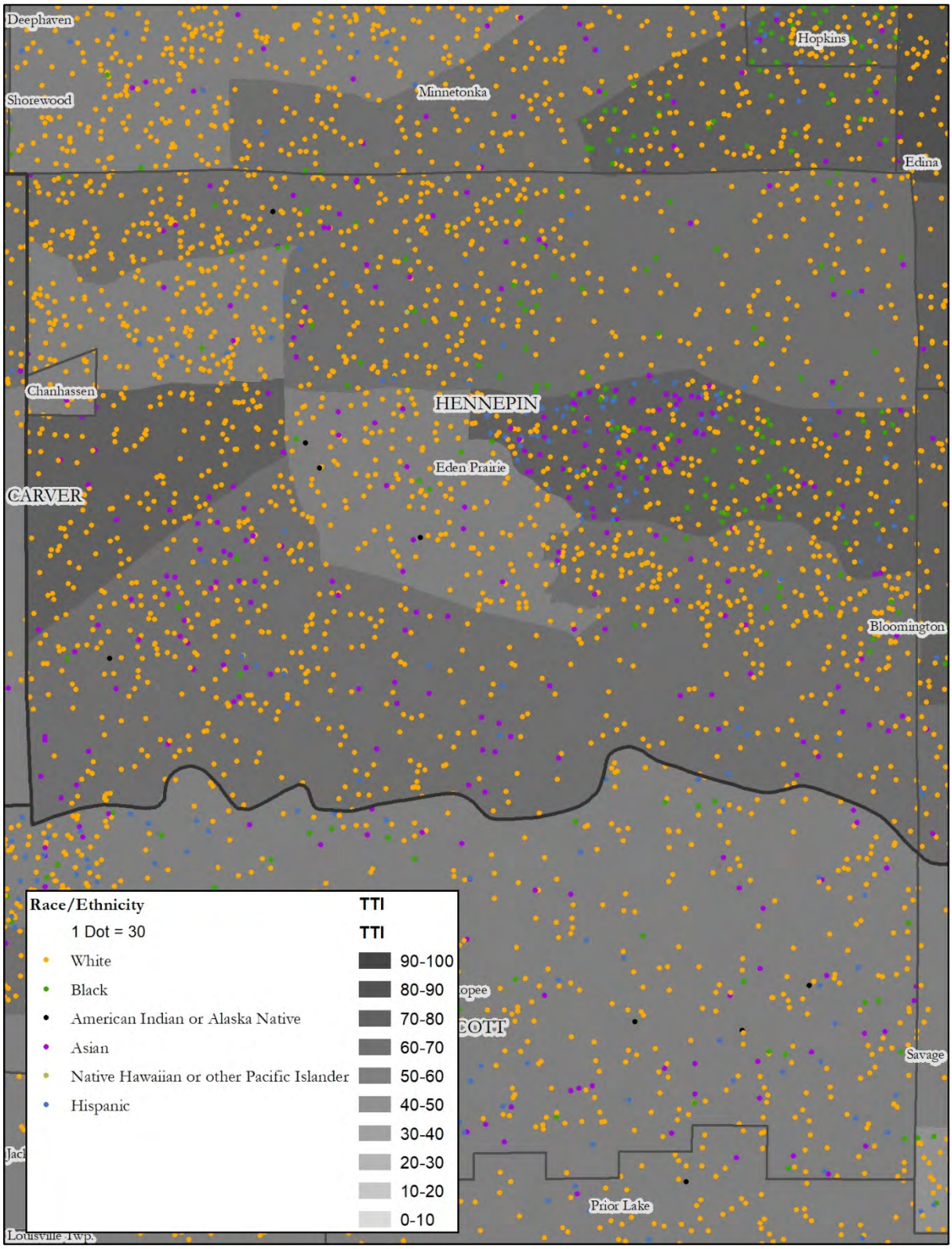
Map 39: Bloomington, Race, Transit Trips Index



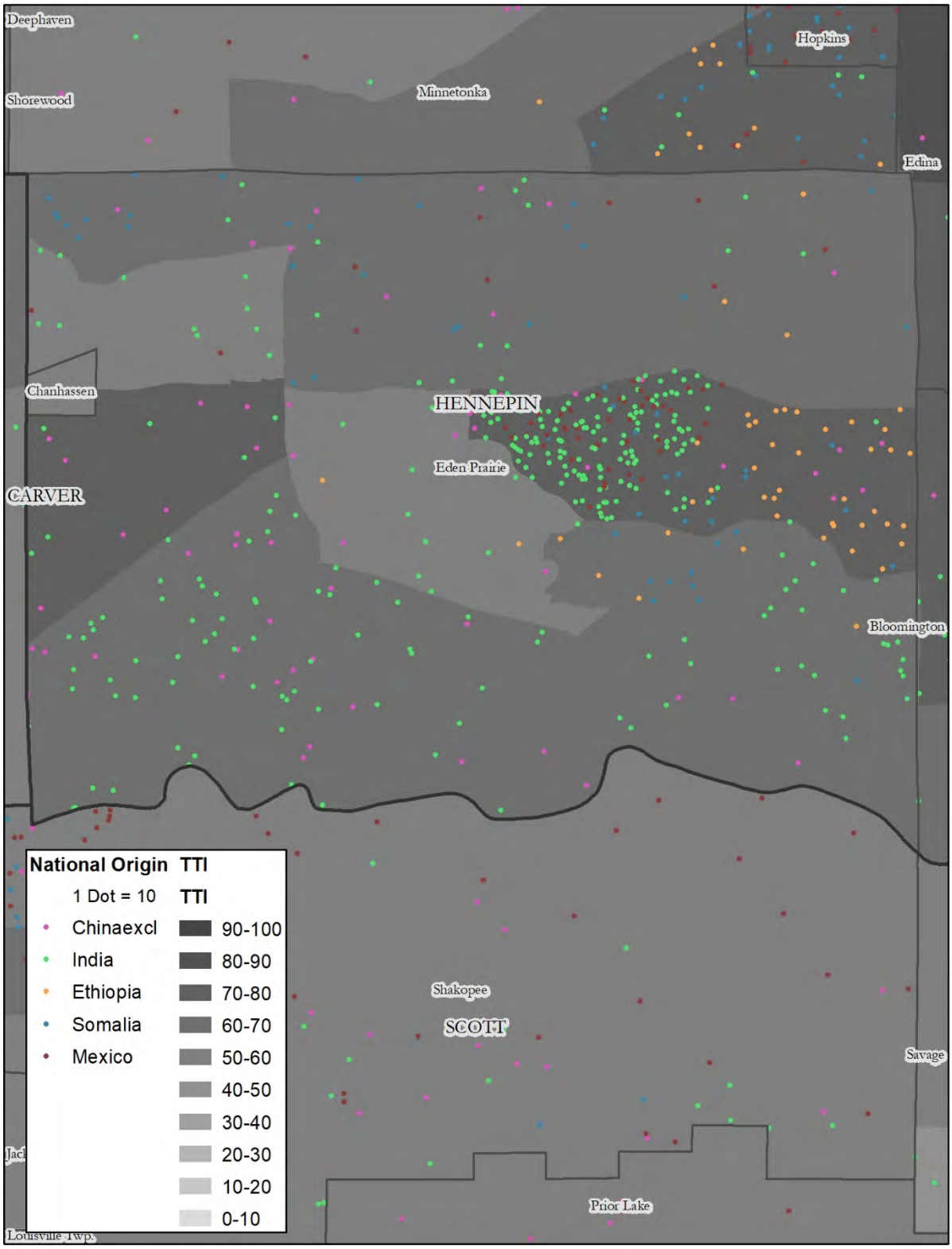
Map 40: Bloomington, National Origin, Transit Trips Index



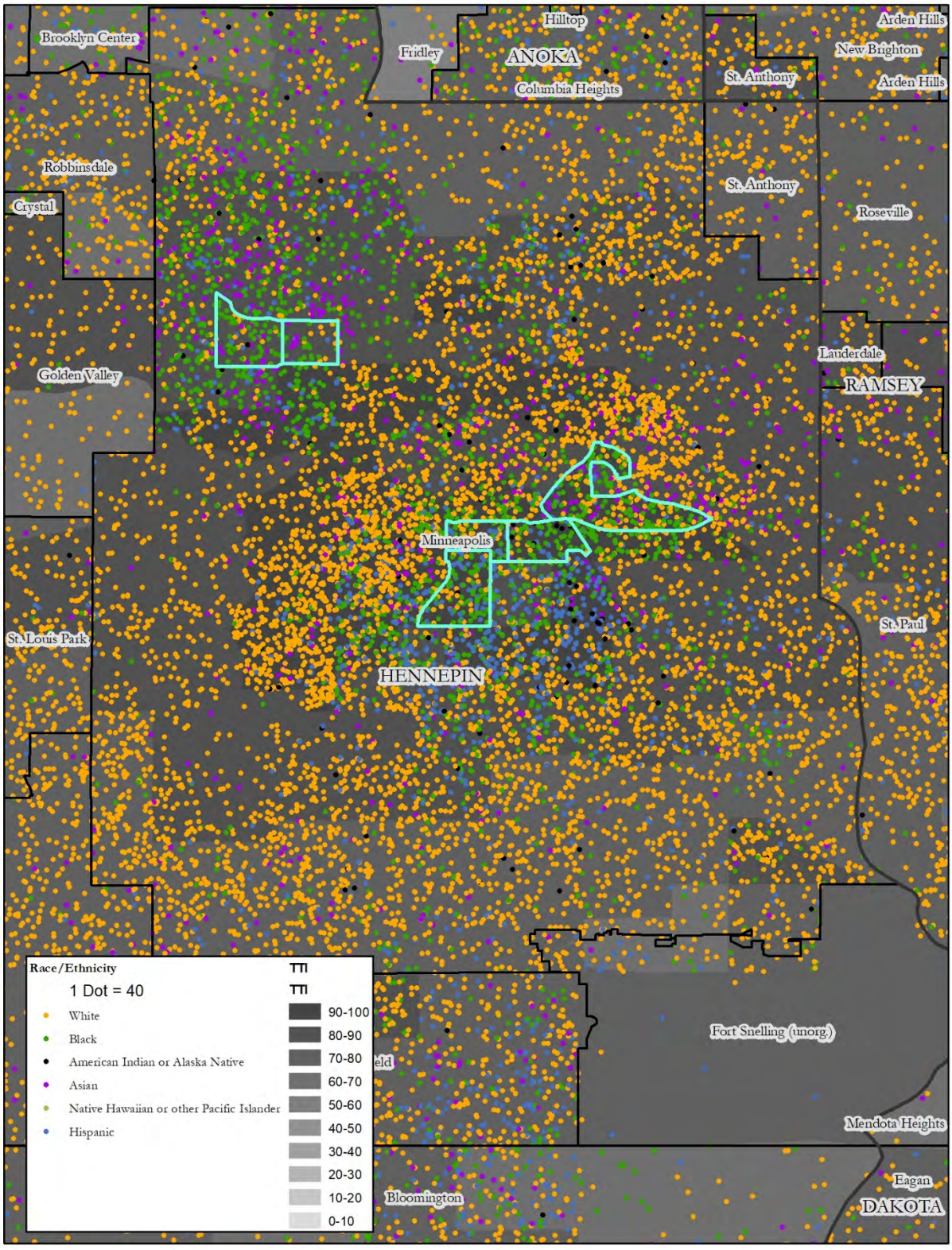
Map 41: Eden Prairie, Race, Transit Trips Index



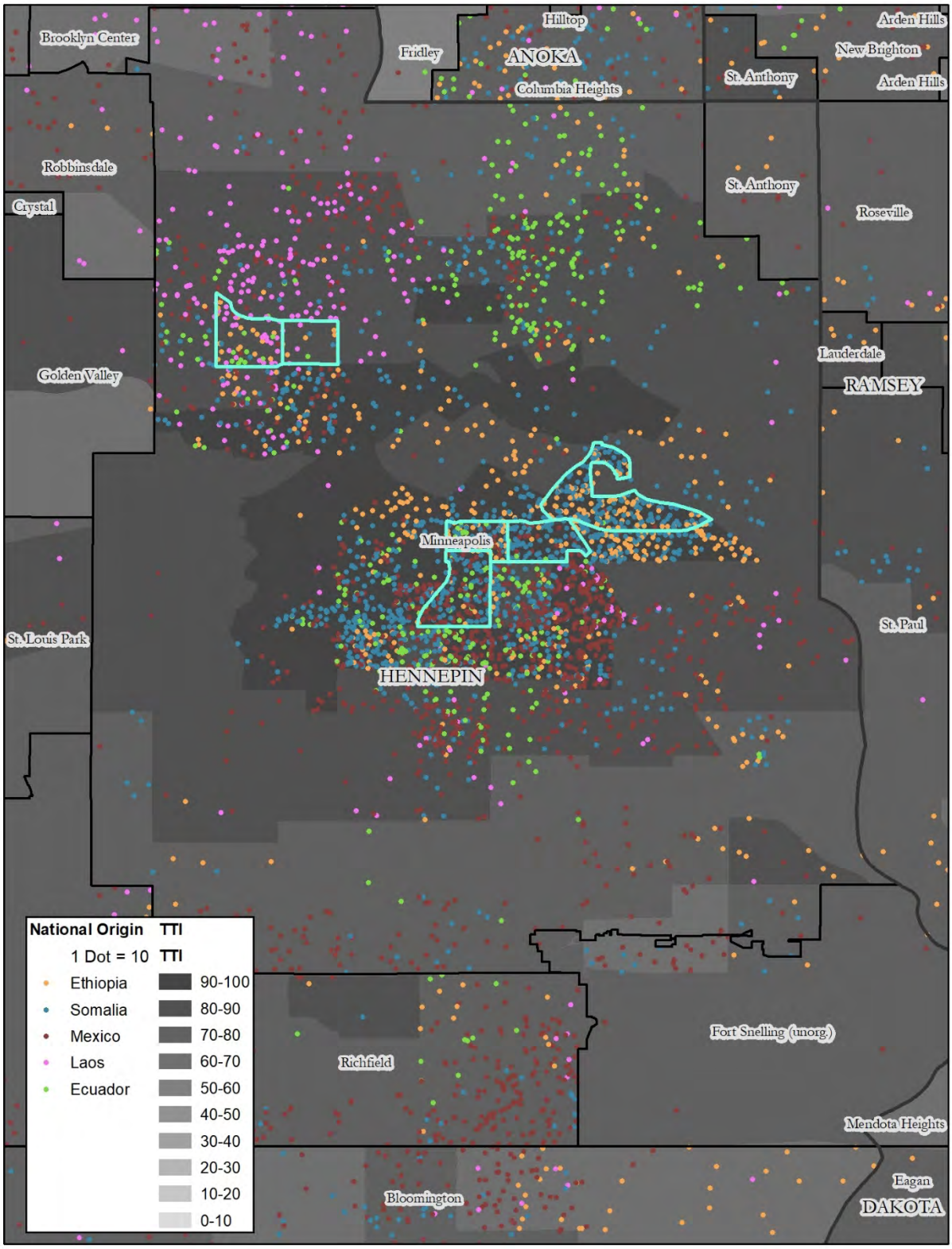
Map 42: Eden Prairie, National Origin, Transit Trips Index



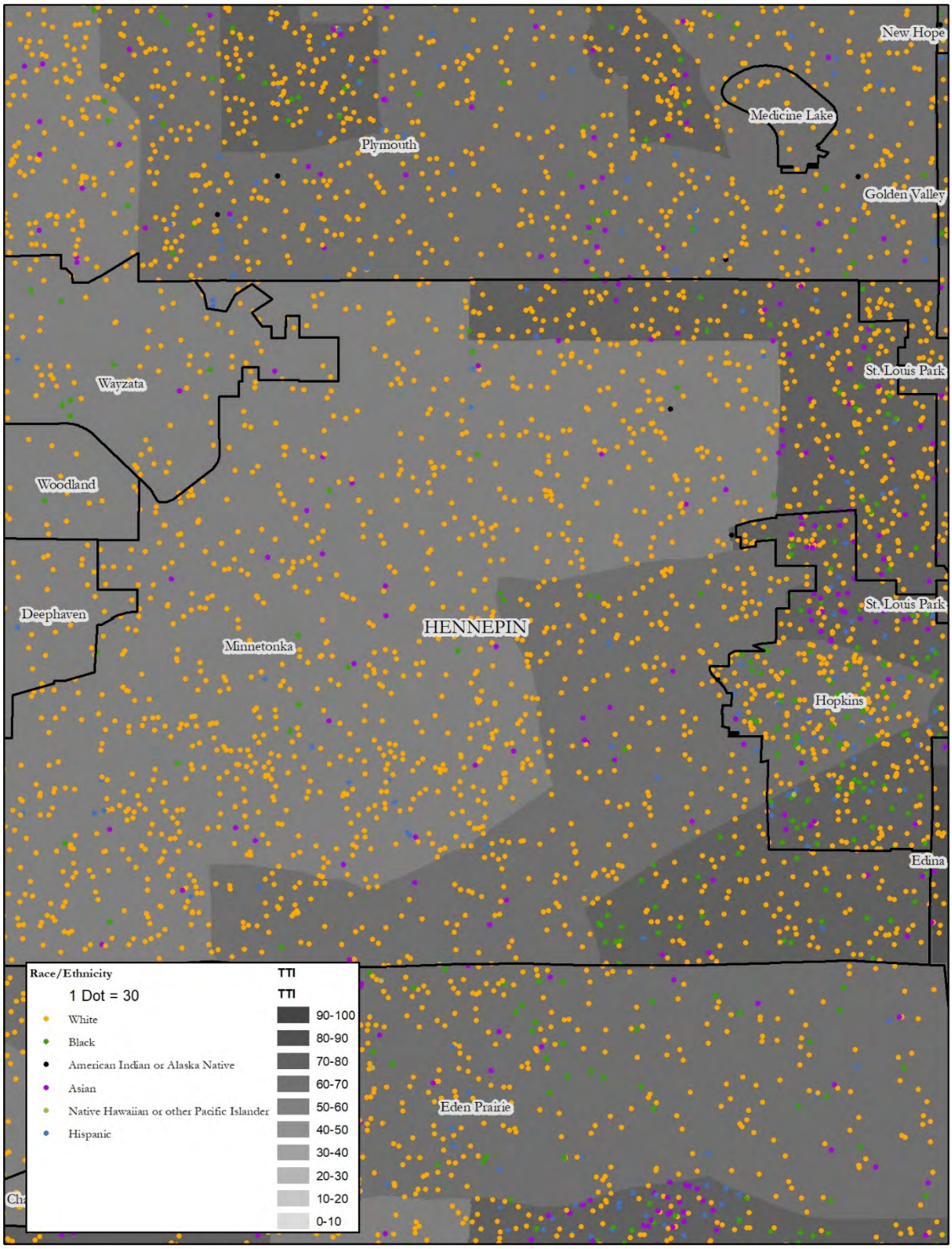
Map 43: Minneapolis, Race, Transit Trips Index



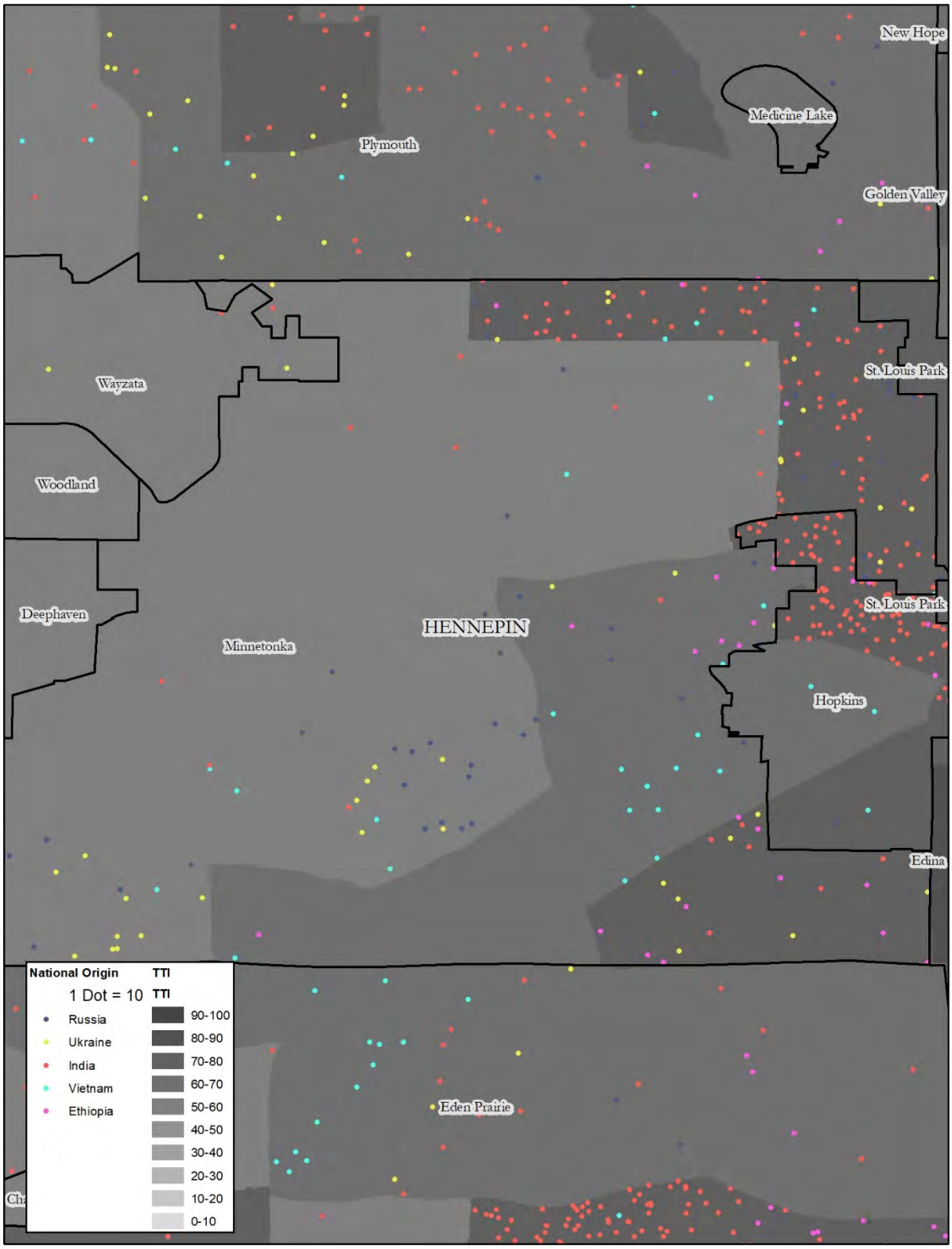
Map 44: Minneapolis, National Origin, Transit Trips Index



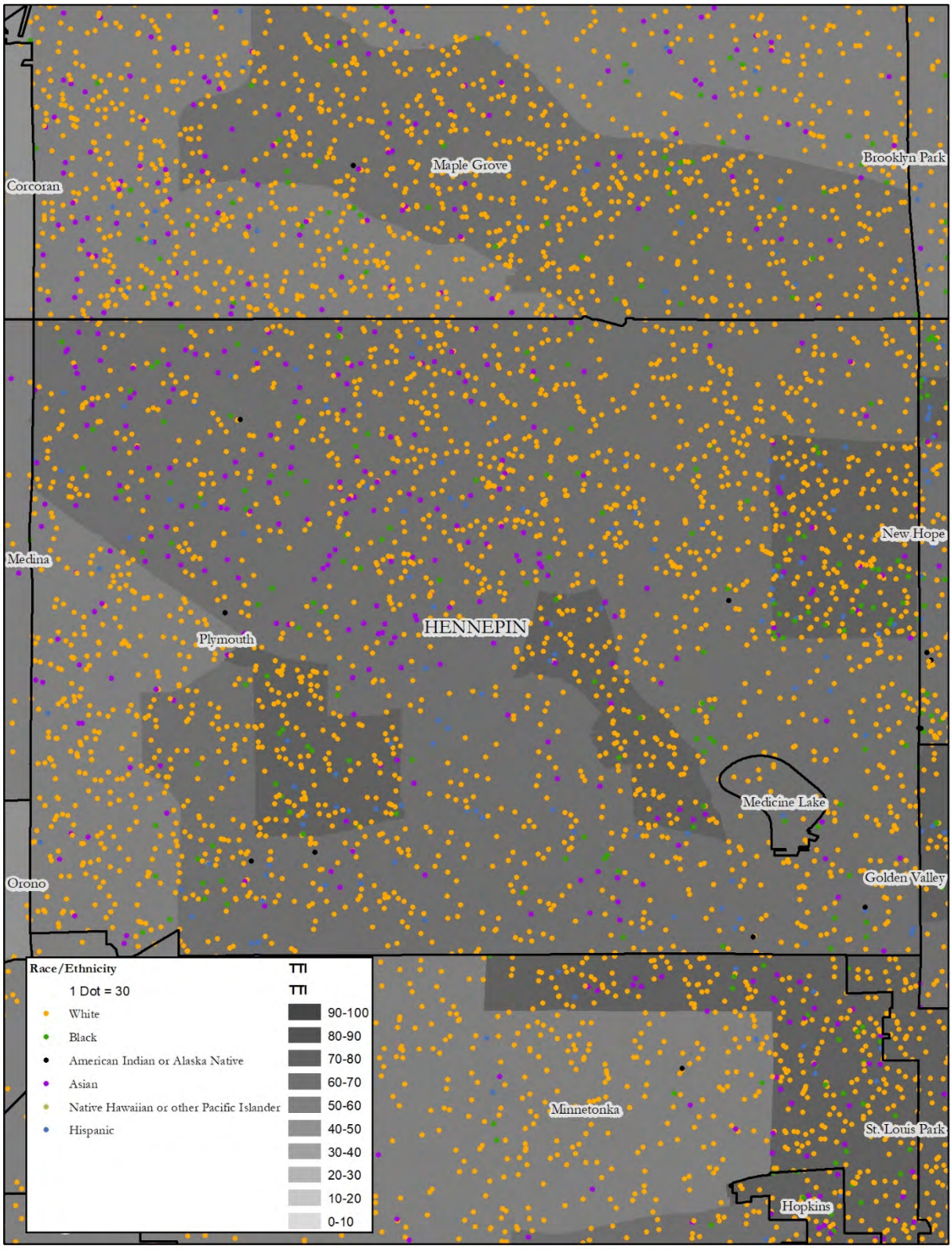
Map 45: Minnetonka, Race, Transit Trips Index



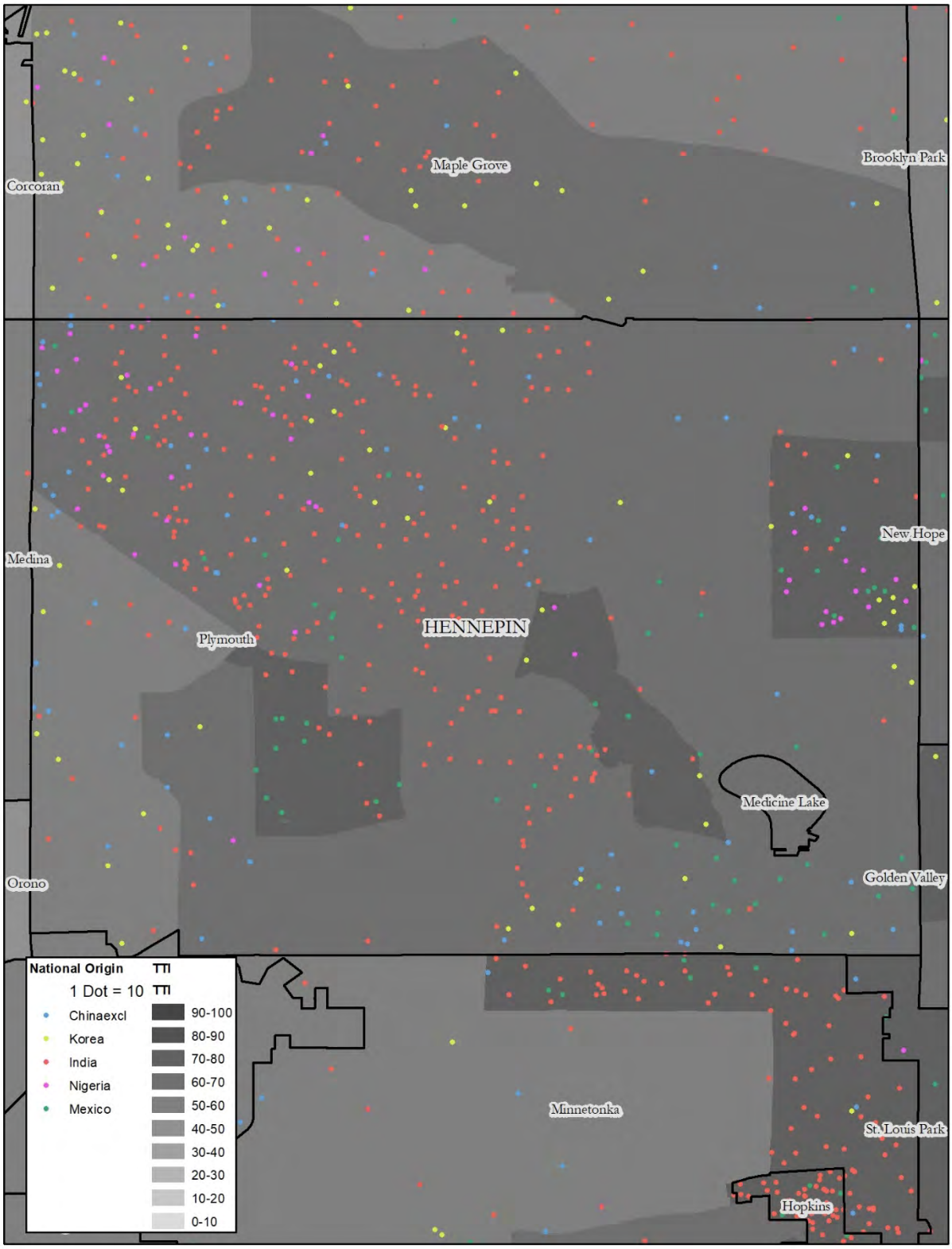
Map 46: Minnetonka, National Origin, Transit Trips Index



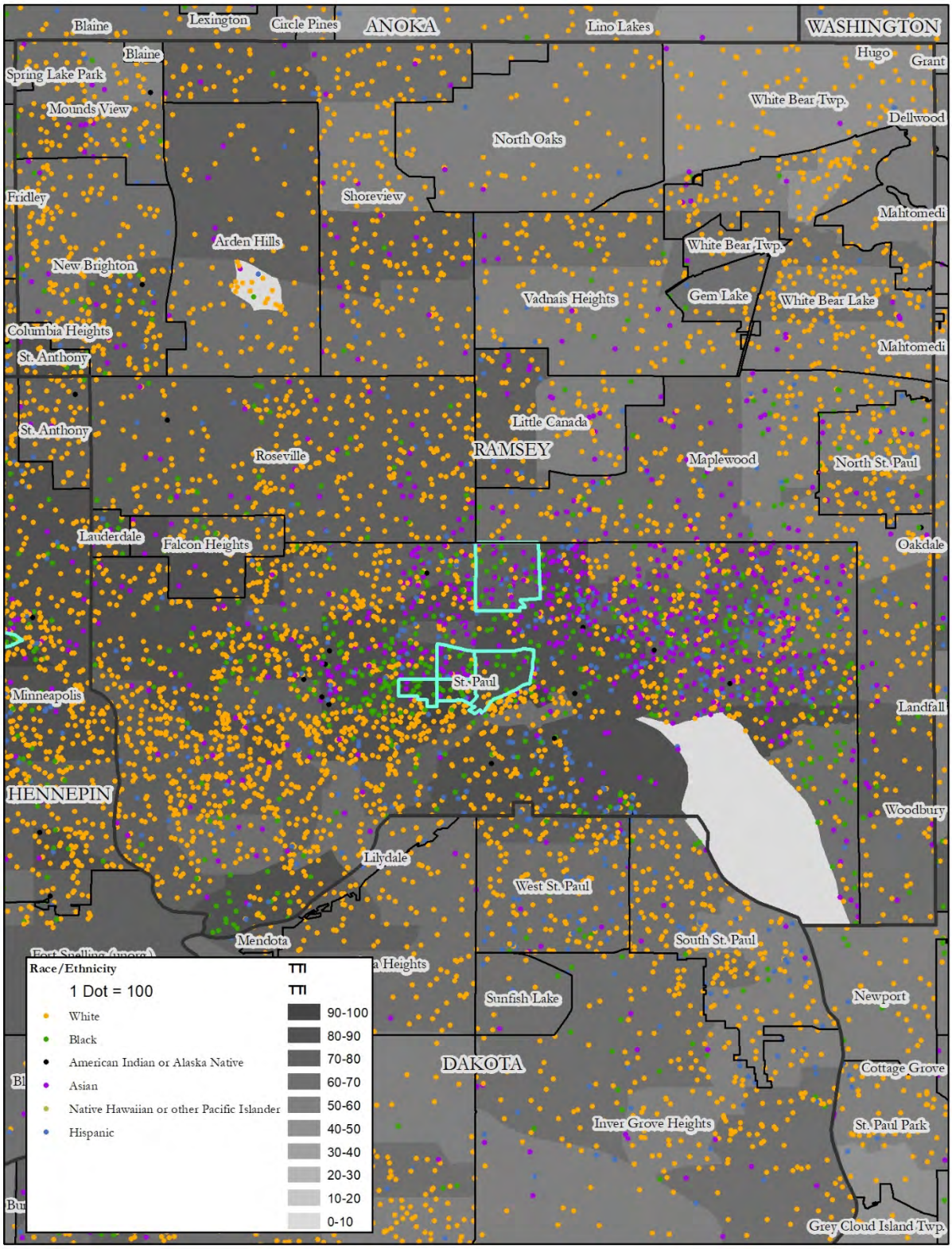
Map 47: Plymouth, Race, Transit Trips Index



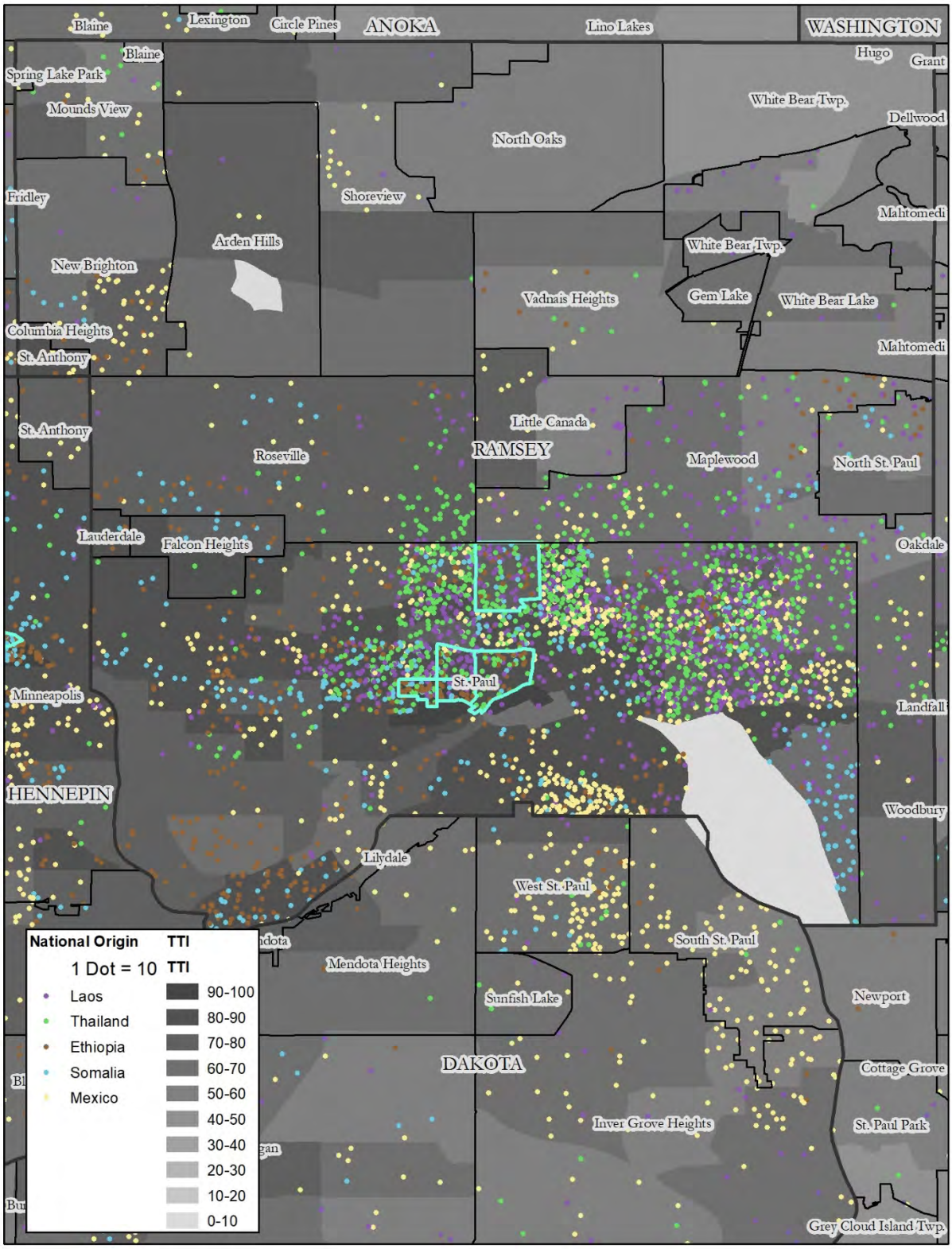
Map 48: Plymouth, National Origin, Transit Trips Index



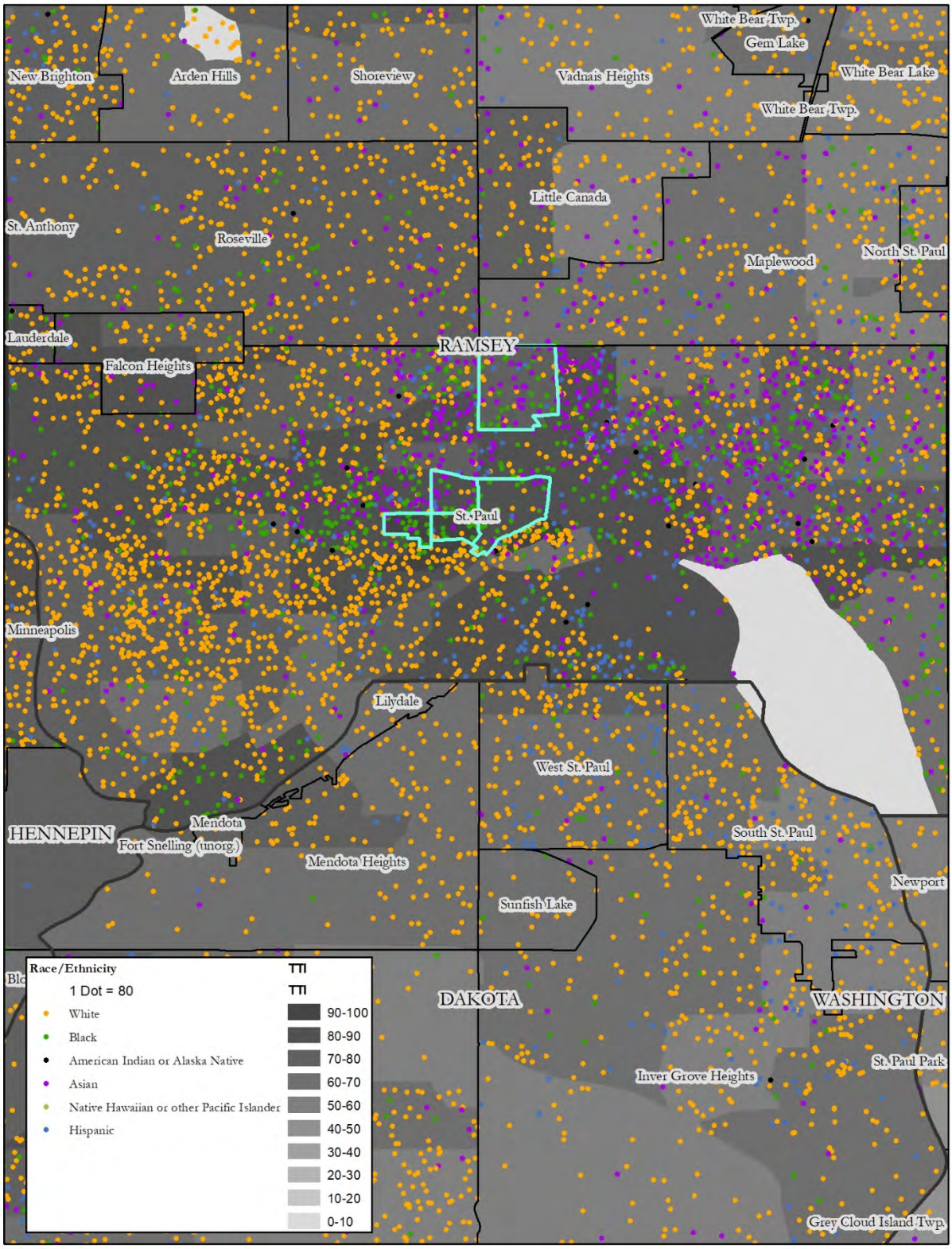
Map 49: Ramsey County, Race, Transit Trips Index



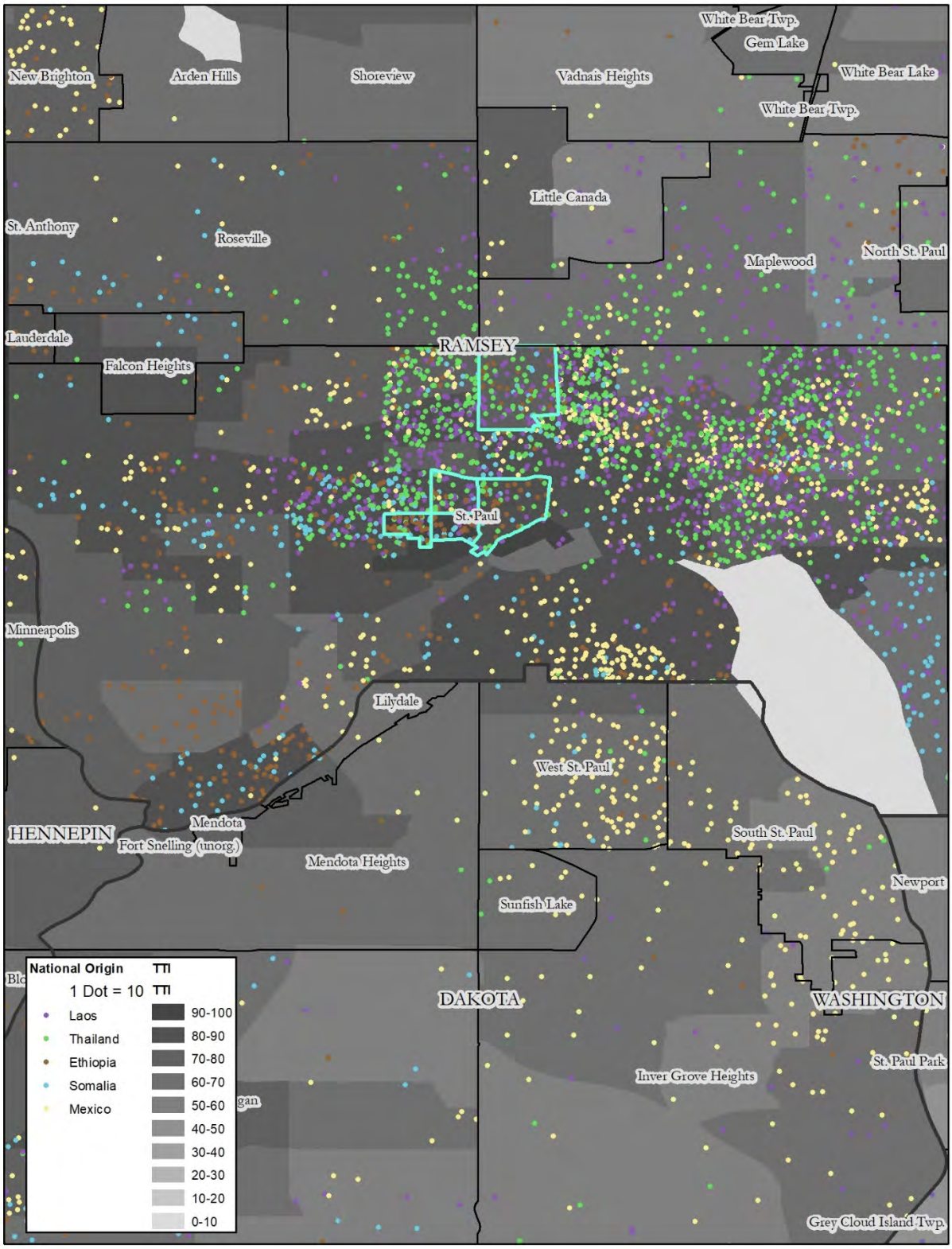
Map 50: Ramsey County, National Origin, Transit Trips Index



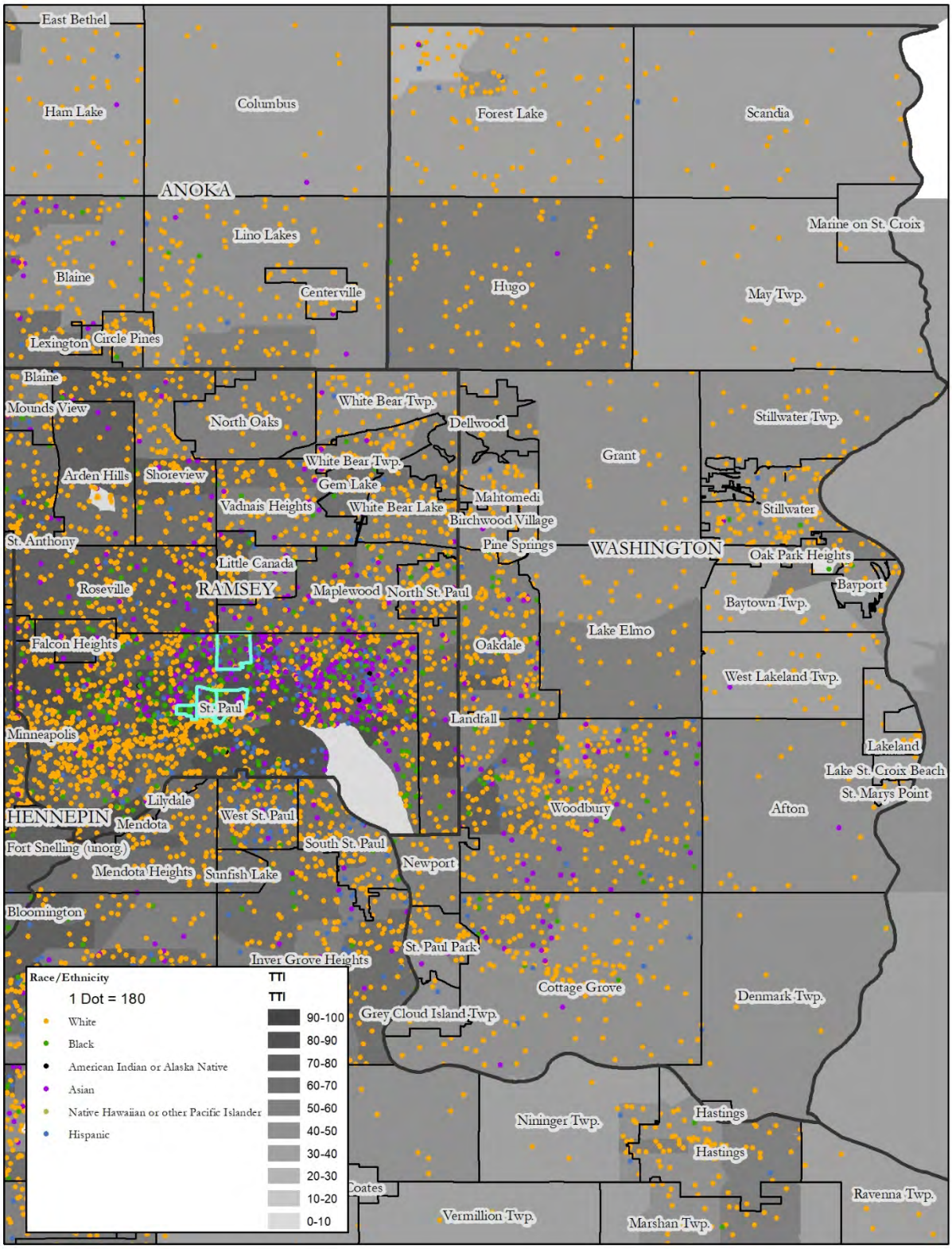
Map 51: St. Paul, Race, Transit Trips Index



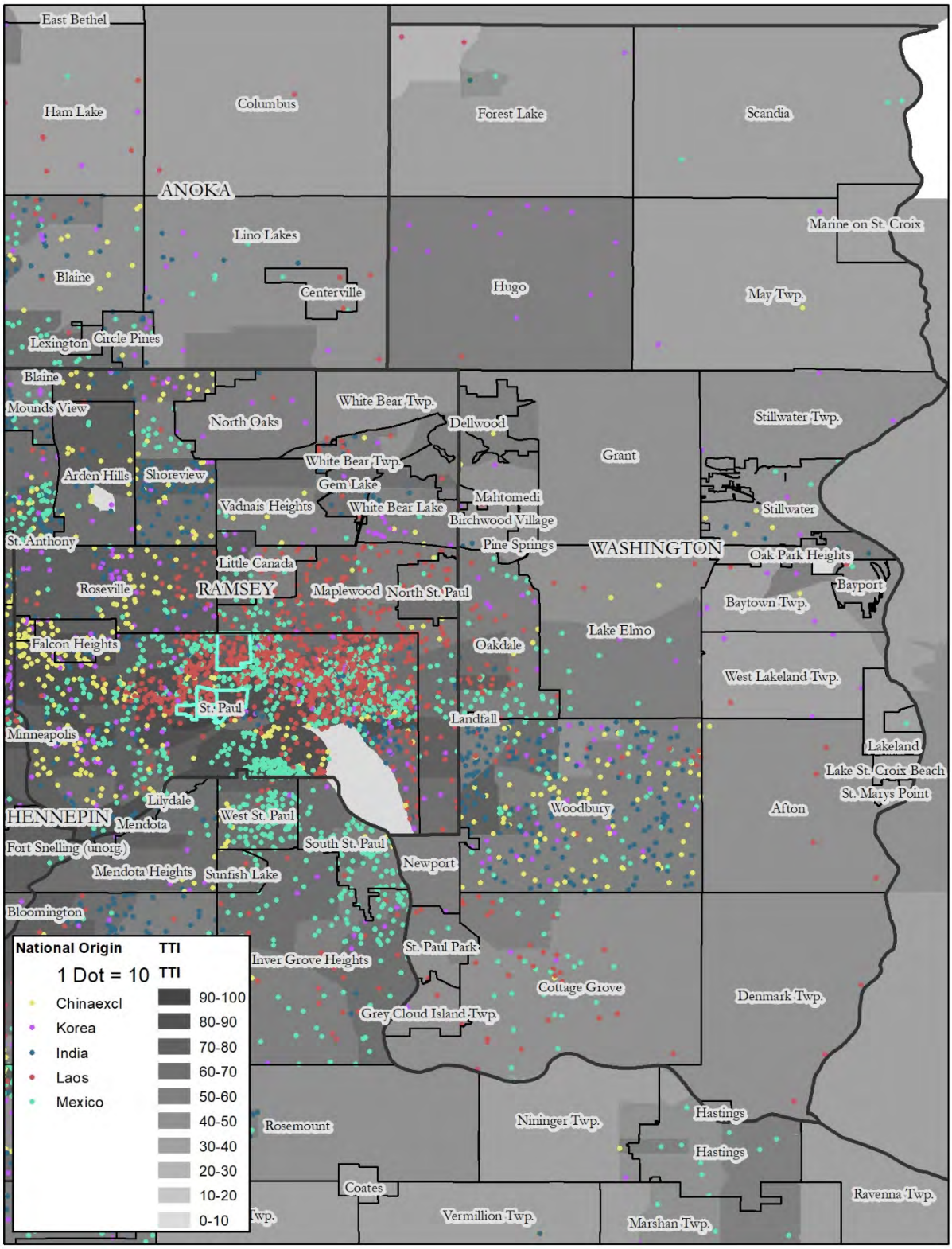
Map 52: St. Paul, National Origin, Transit Trips Index



Map 53: Washington County, Race, Transit Trips Index

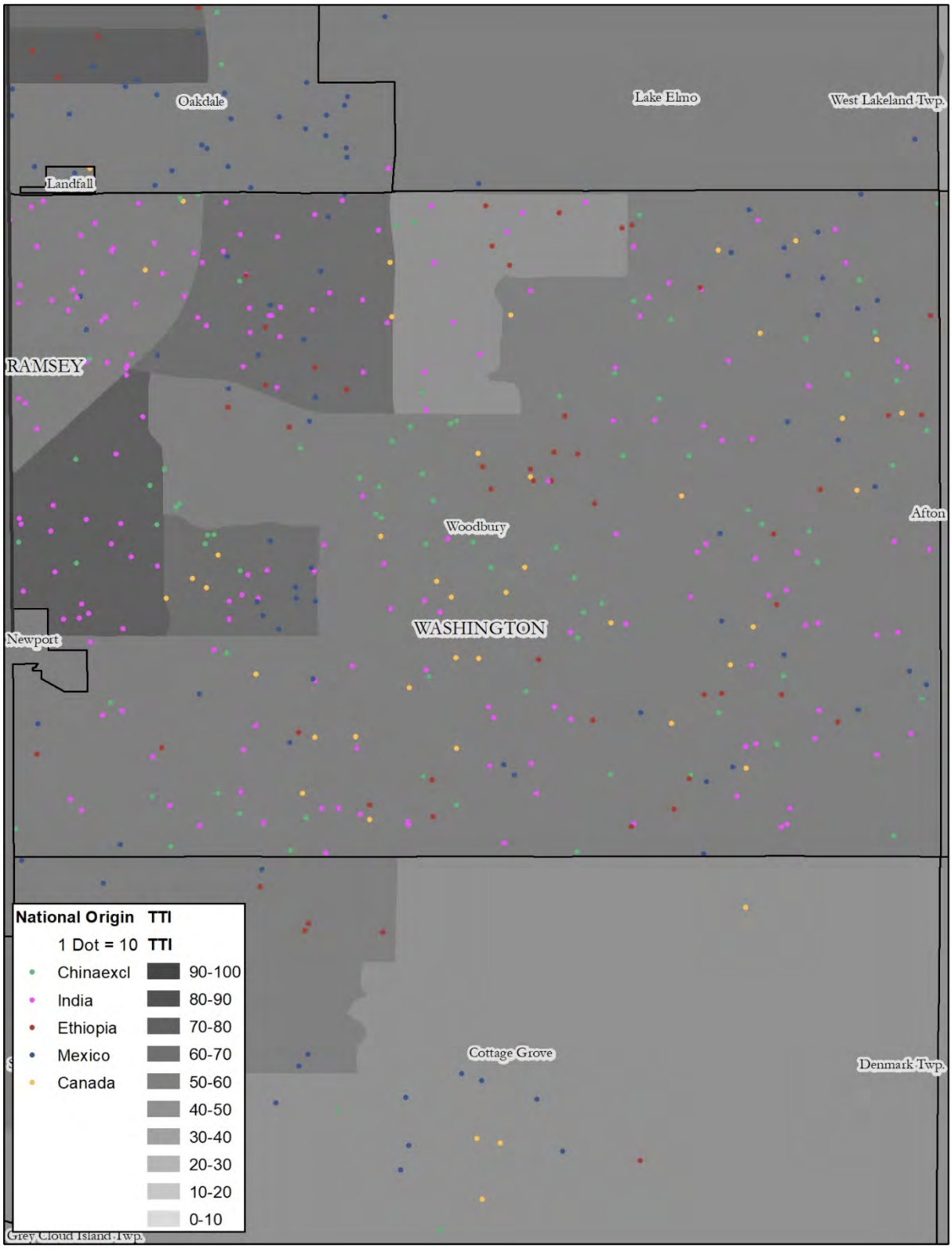


Map 54: Washington County, National Origin, Transit Trips Index

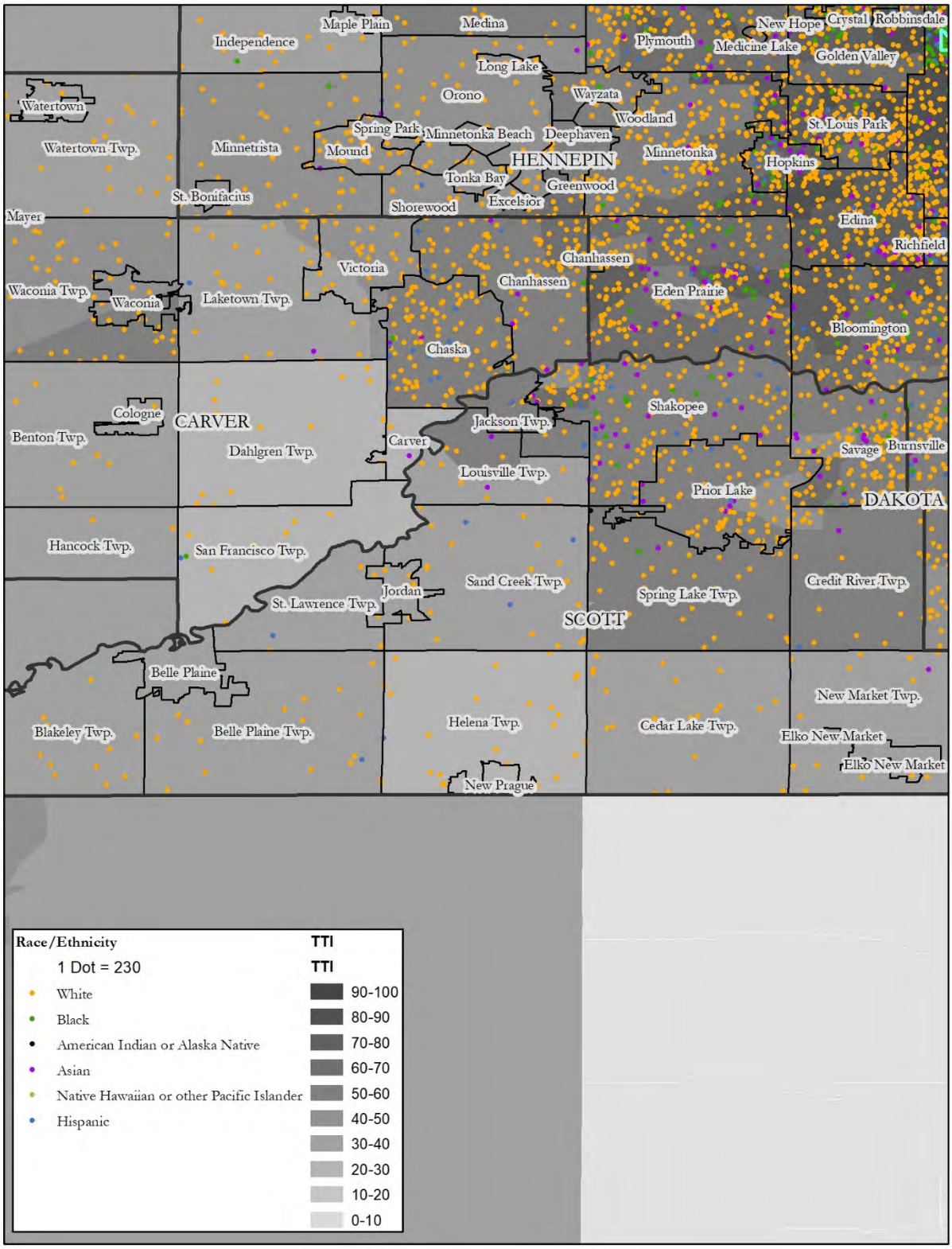


Map 55: Woodbury, Race, Transit Trips Index

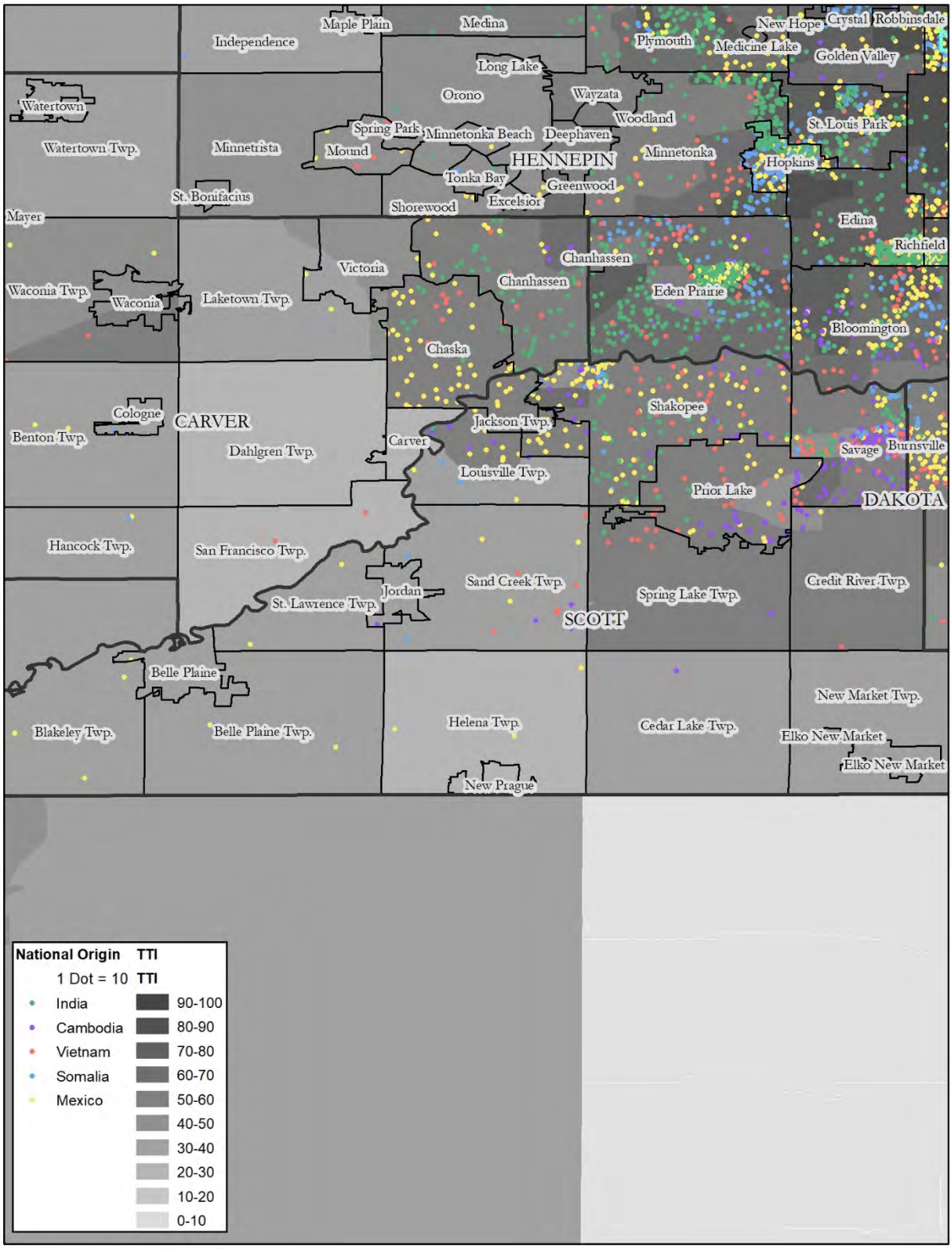
Map 56: Woodbury, National Origin, Transit Trips Index



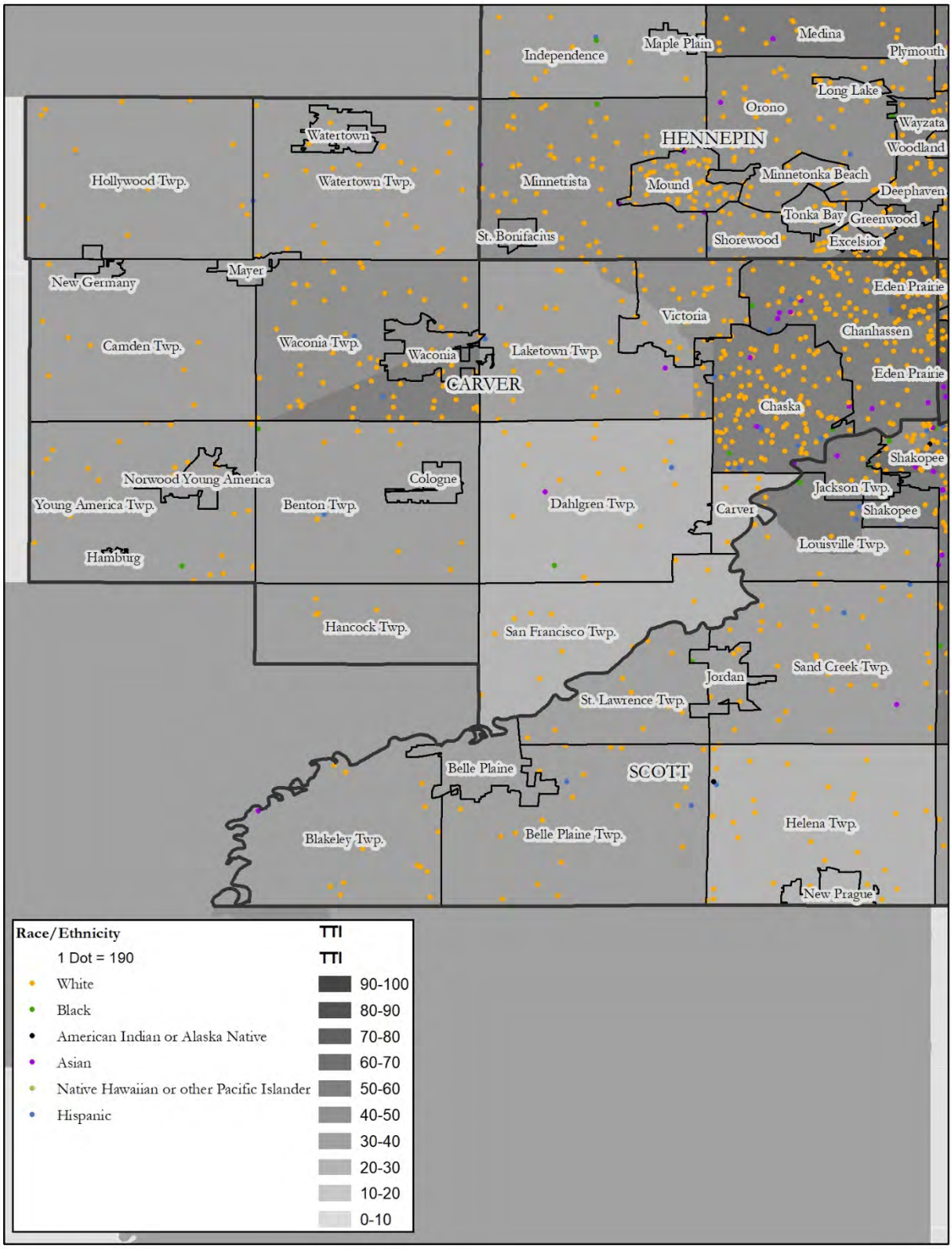
Map 57: Scott County, Race, Transit Trips Index



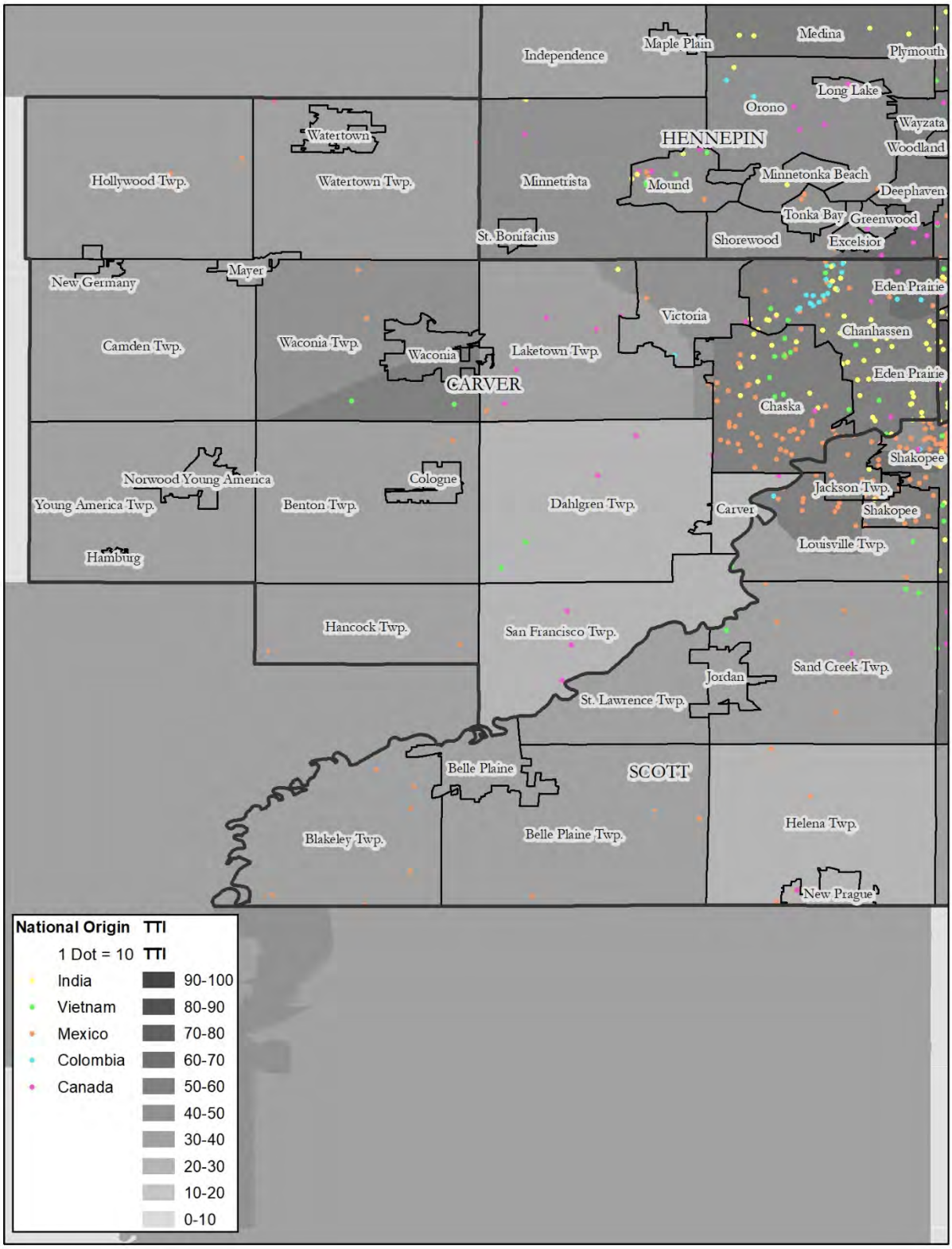
Map 58: Scott County, National Origin, Transit Trips Index



Map 59: Carver County, Race, Transit Trips Index

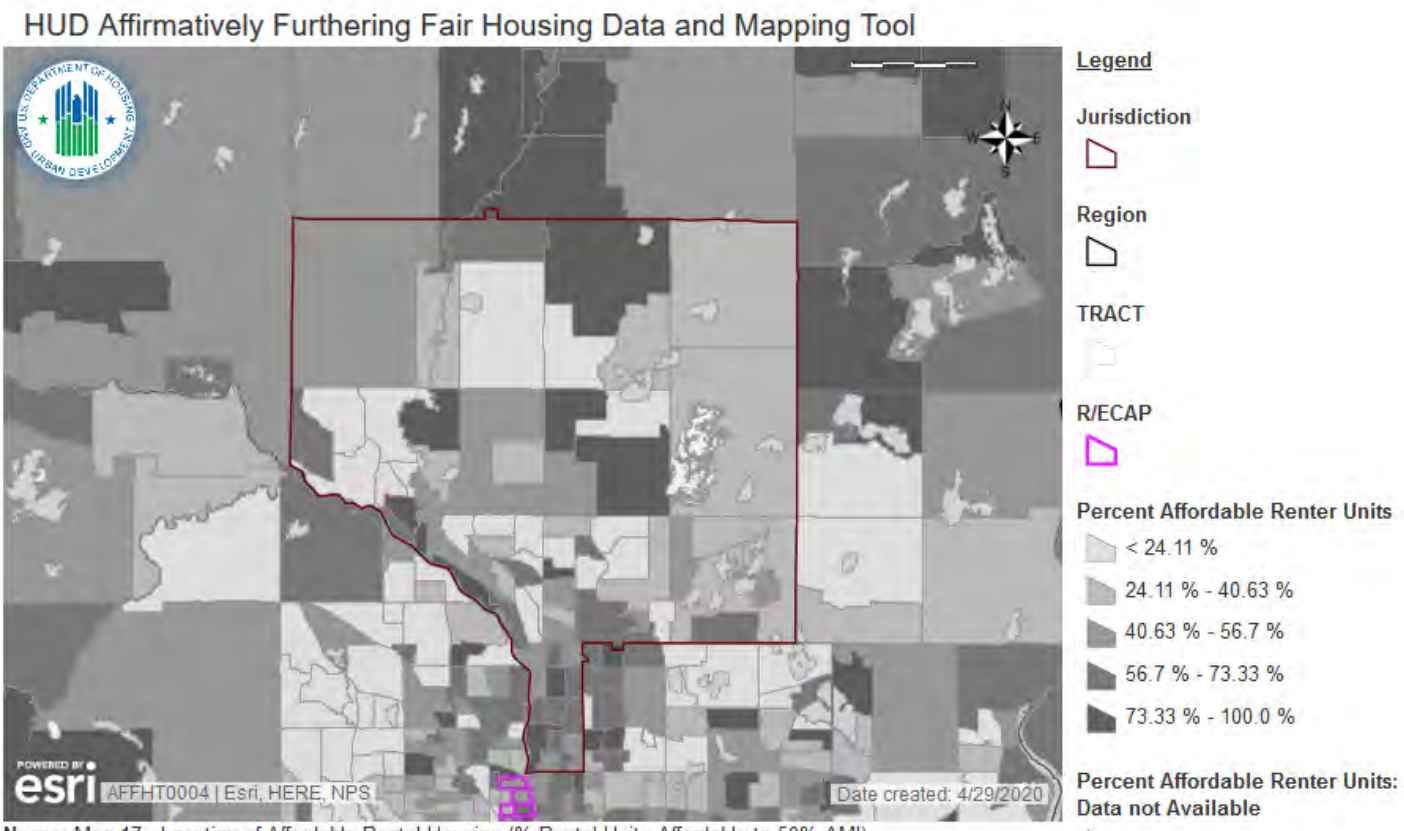


Map 60: Carver County, National Origin, Transit Trips Index



E. Publicly Supported Housing Appendix

Map 1: Location of Affordable Rental Housing, Anoka County



Name: Map 17 - Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

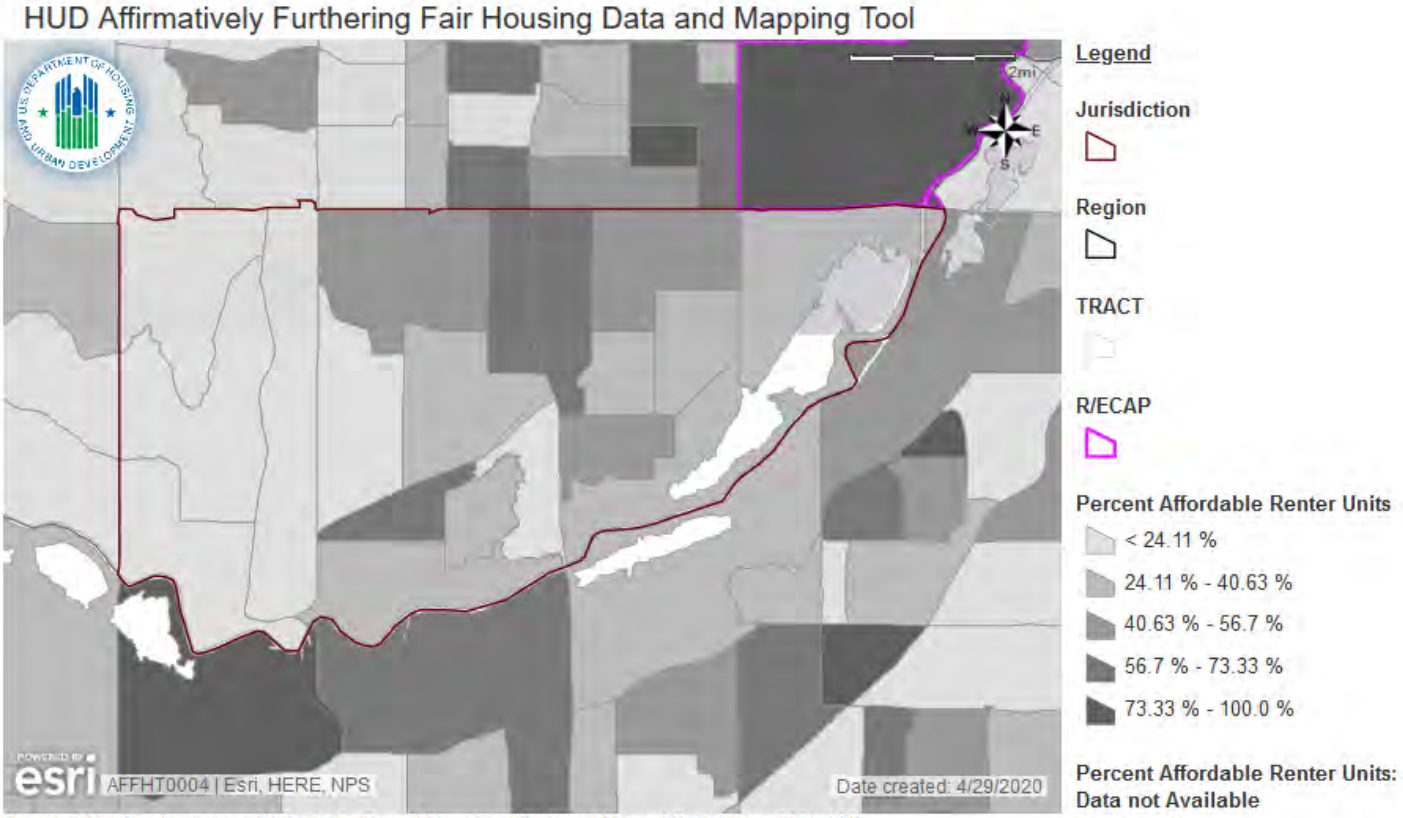
Description: Map of percent of rental units affordable, defined as units renting at or less than 30% of household income for a household with income at 50% of AMI.

Jurisdiction: Anoka County (CDBG)

Region: Minneapolis-St. Paul-Bloomington, MN-WI

HUD-Provided Data Version: AFFHT0004

Map 2: Location of Affordable Rental Housing, Bloomington



Name: Map 17 - Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

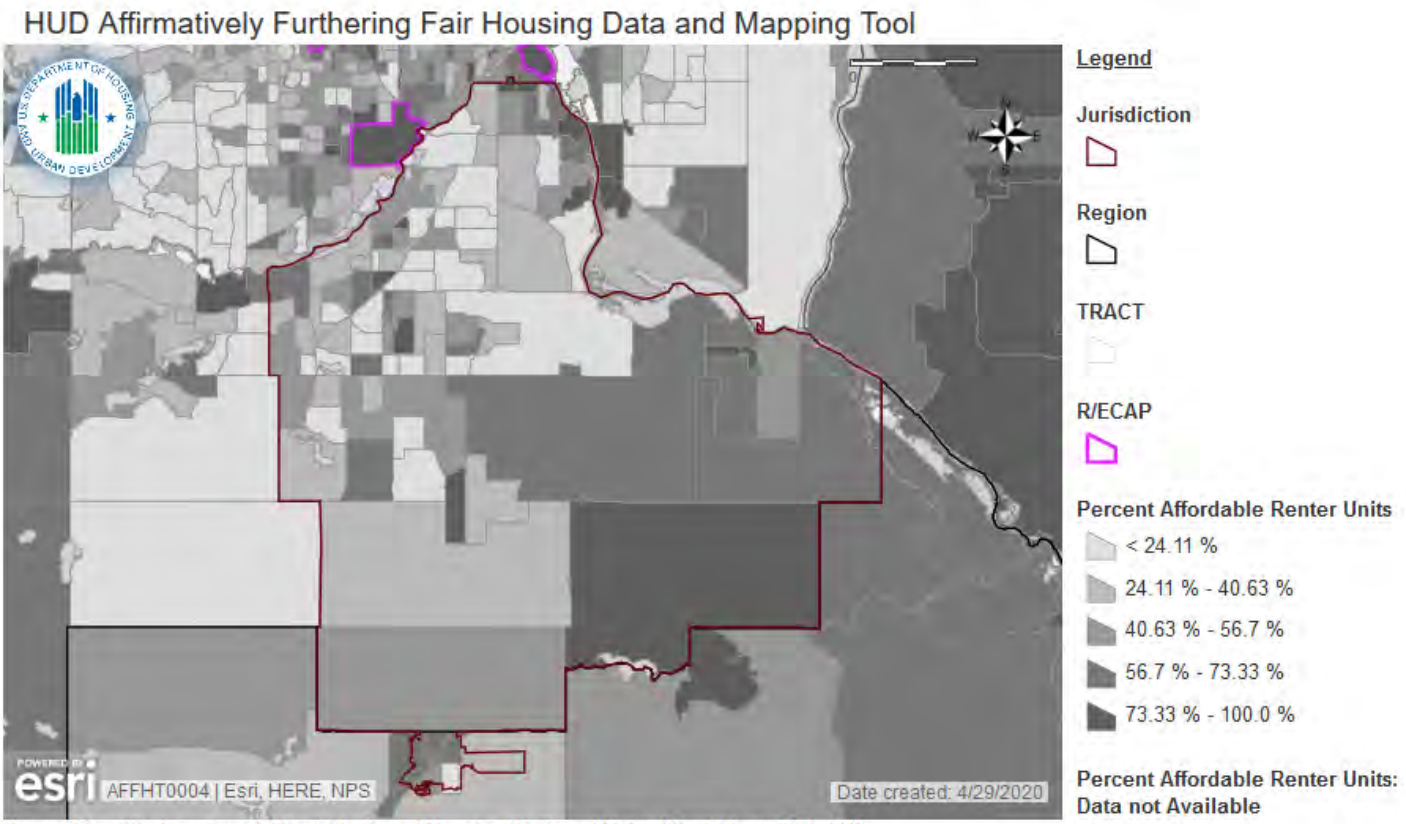
Description: Map of percent of rental units affordable, defined as units renting at or less than 30% of household income for a household with income at 50% of AMI.

Jurisdiction: Bloomington (CDBG)

Region: Minneapolis-St. Paul-Bloomington, MN-WI

HUD-Provided Data Version: AFFHT0004

Map 3: Location of Affordable Rental Housing, Dakota County



Name: Map 17 - Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

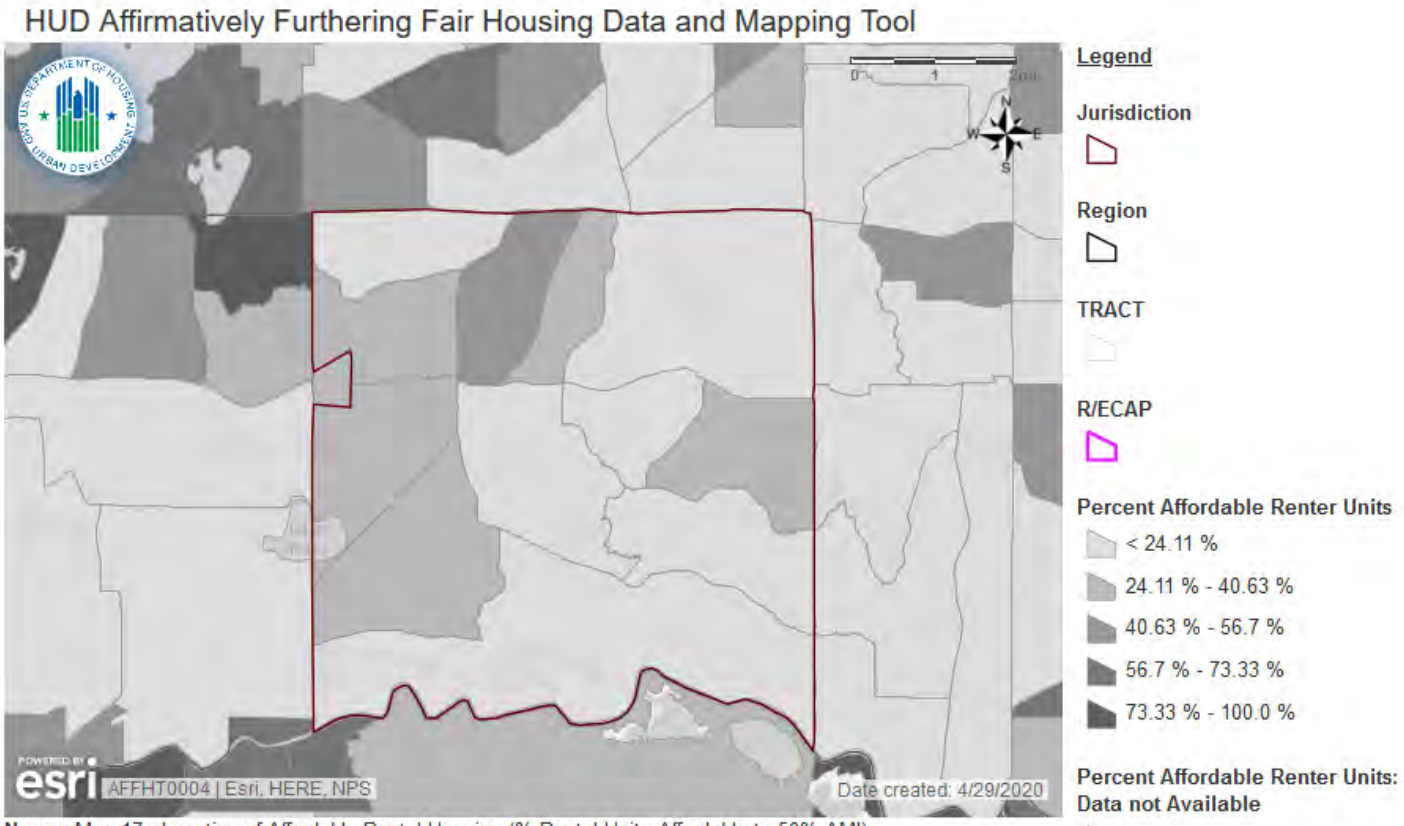
Description: Map of percent of rental units affordable, defined as units renting at or less than 30% of household income for a household with income at 50% of AMI.

Jurisdiction: Dakota County (CDBG, ESG)

Region: Minneapolis-St. Paul-Bloomington, MN-WI

HUD-Provided Data Version: AFFHT0004

Map 4: Location of Affordable Rental Housing, Eden Prairie



Name: Map 17 - Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

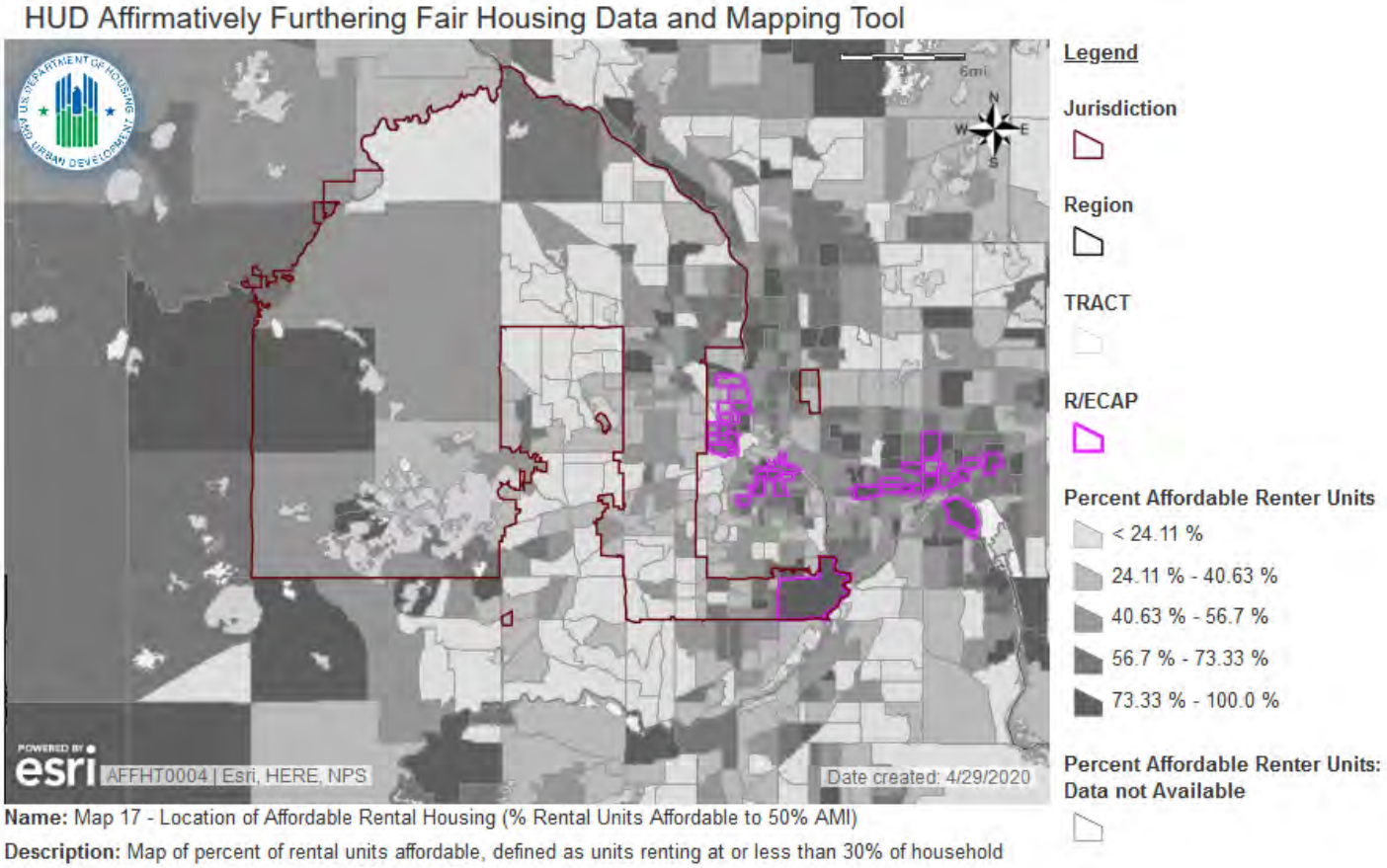
Description: Map of percent of rental units affordable, defined as units renting at or less than 30% of household income for a household with income at 50% of AMI.

Jurisdiction: Eden Prairie (CDBG)

Region: Minneapolis-St. Paul-Bloomington, MN-WI

HUD-Provided Data Version: AFFHT0004

Map 5: Location of Affordable Rental Housing, Hennepin County



Name: Map 17 - Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

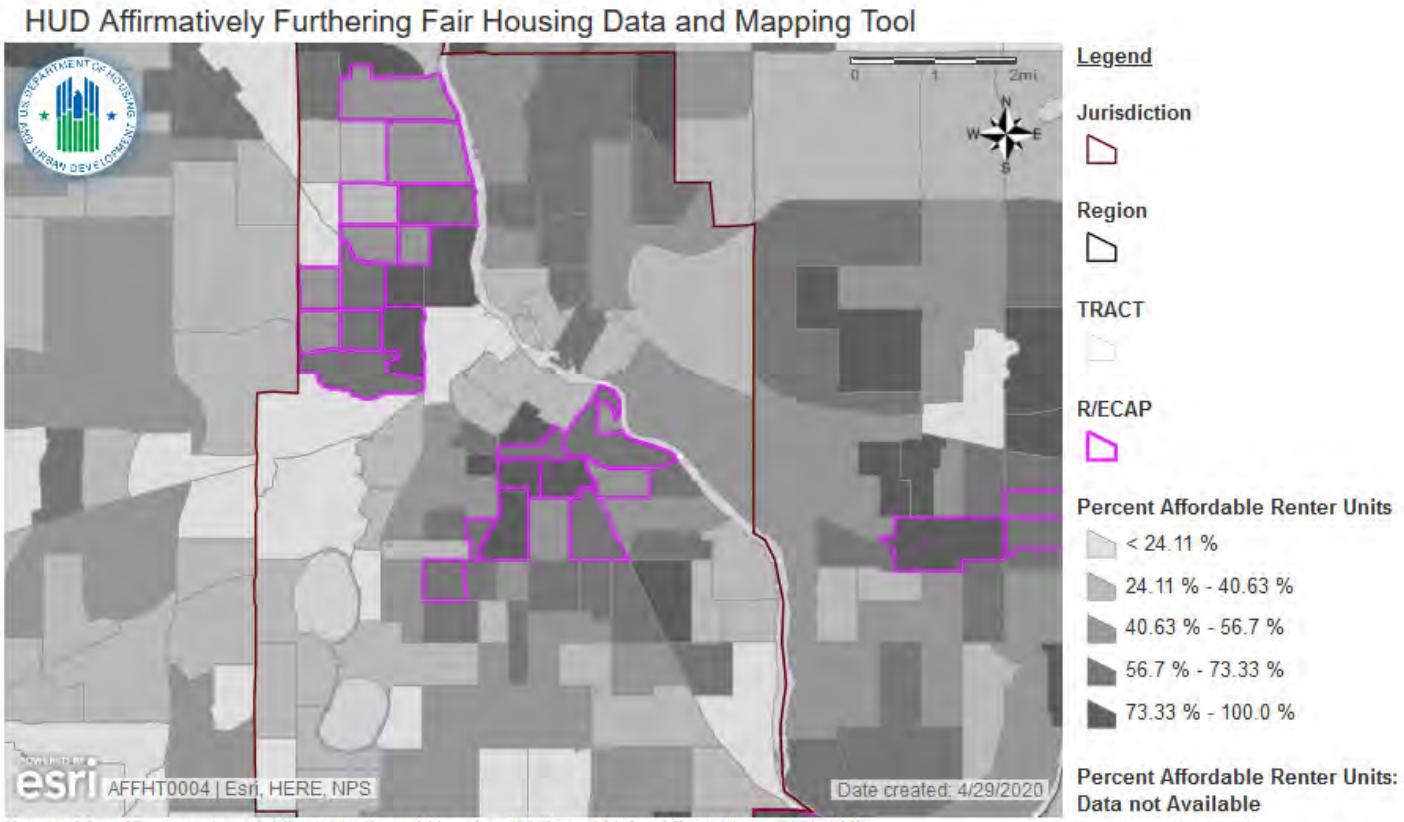
Description: Map of percent of rental units affordable, defined as units renting at or less than 30% of household income for a household with income at 50% of AMI.

Jurisdiction: Hennepin County (CDBG, ESG)

Region: Minneapolis-St. Paul-Bloomington, MN-WI

HUD-Provided Data Version: AFFHT0004

Map 6: Location of Affordable Rental Housing, Minneapolis



Name: Map 17 - Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

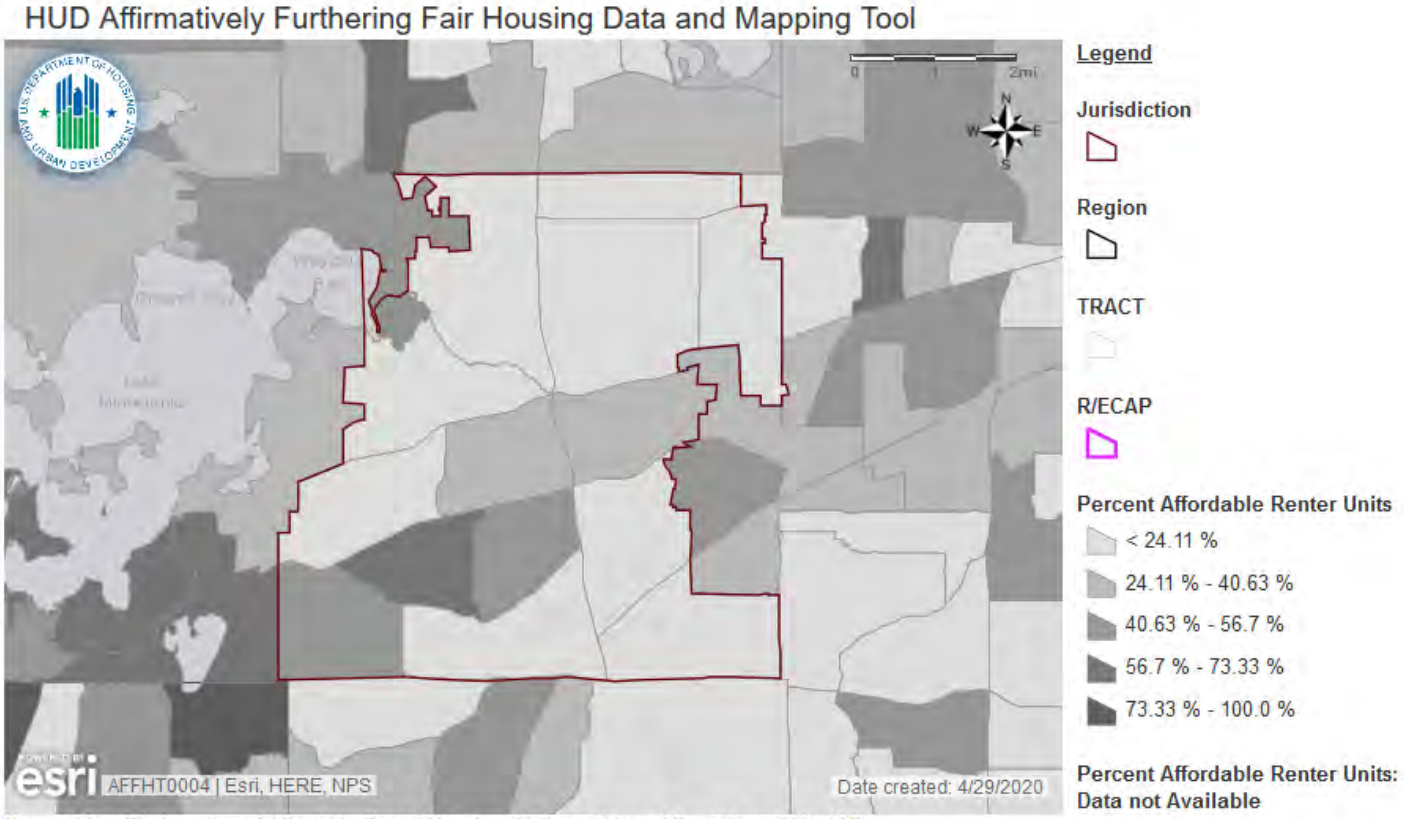
Description: Map of percent of rental units affordable, defined as units renting at or less than 30% of household income for a household with income at 50% of AMI.

Jurisdiction: Minneapolis (CDBG, HOME, ESG)

Region: Minneapolis-St. Paul-Bloomington, MN-WI

HUD-Provided Data Version: AFFHT0004

Map 7: Location of Affordable Rental Housing, Minnetonka



Name: Map 17 - Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

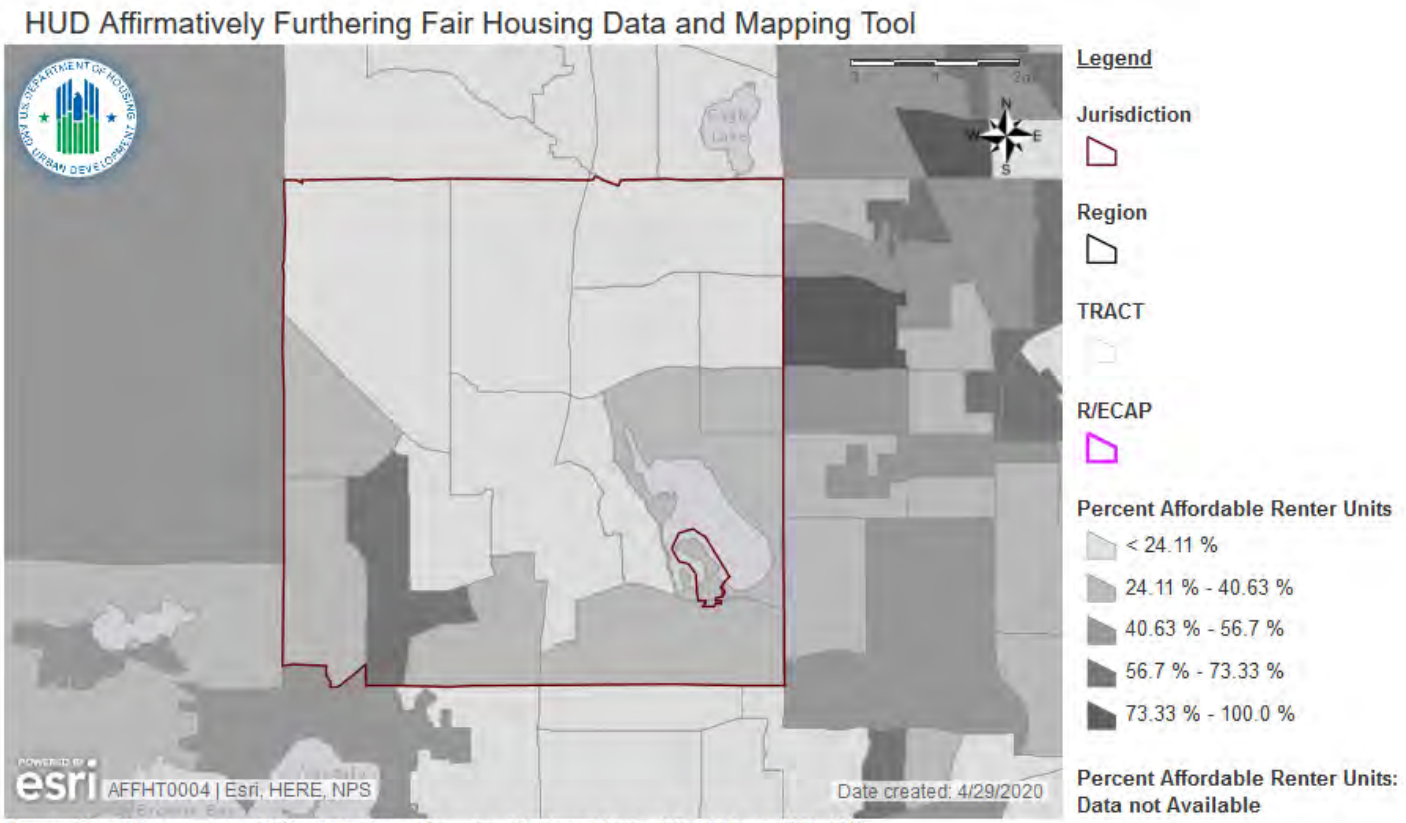
Description: Map of percent of rental units affordable, defined as units renting at or less than 30% of household income for a household with income at 50% of AMI.

Jurisdiction: Minnetonka (CDBG)

Region: Minneapolis-St. Paul-Bloomington, MN-WI

HUD-Provided Data Version: AFFHT0004

Map 8: Location of Affordable Rental Housing, Plymouth



Name: Map 17 - Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

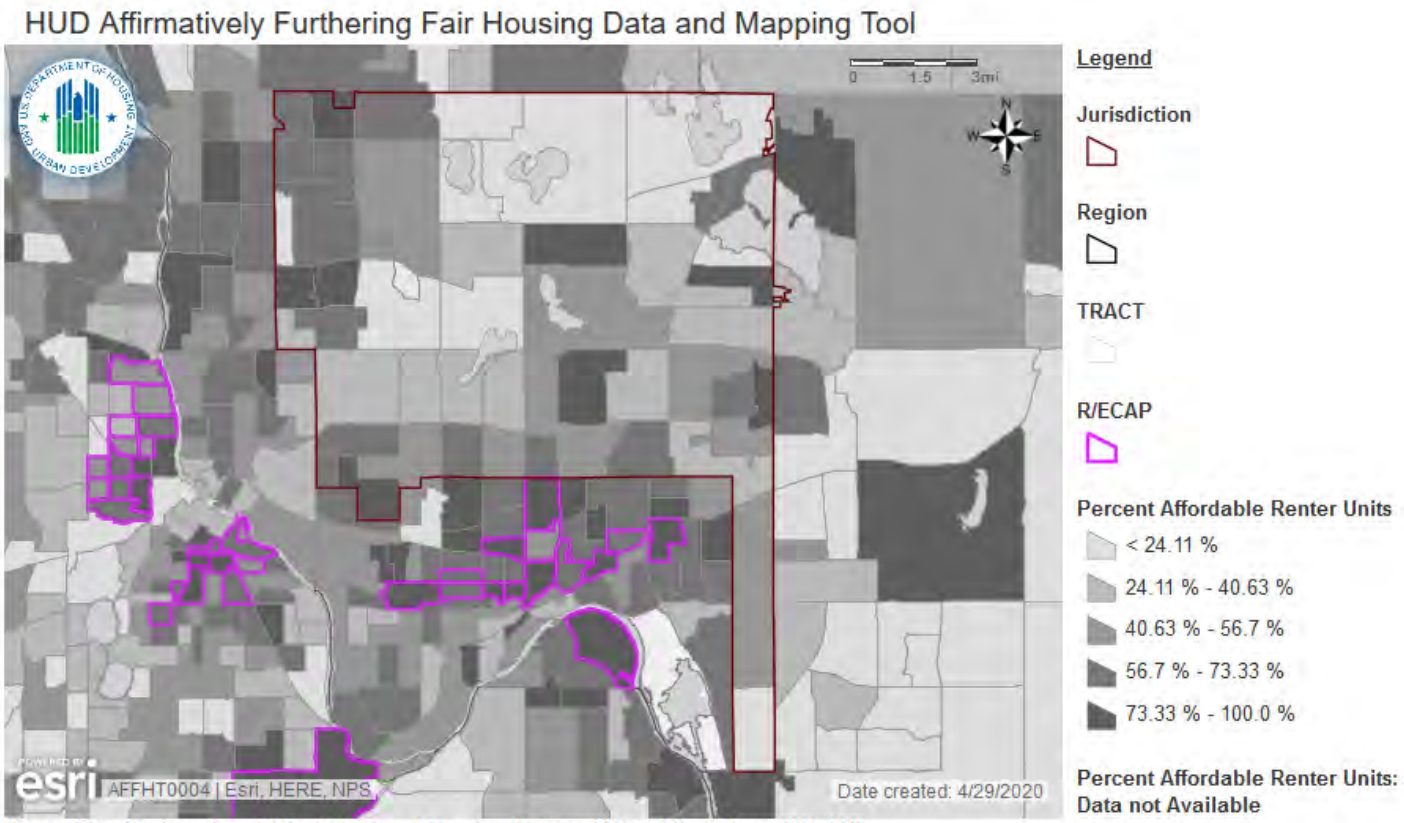
Description: Map of percent of rental units affordable, defined as units renting at or less than 30% of household income for a household with income at 50% of AMI.

Jurisdiction: Plymouth (CDBG)

Region: Minneapolis-St. Paul-Bloomington, MN-WI

HUD-Provided Data Version: AFFHT0004

Map 9: Location of Affordable Rental Housing, Ramsey County



Name: Map 17 - Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

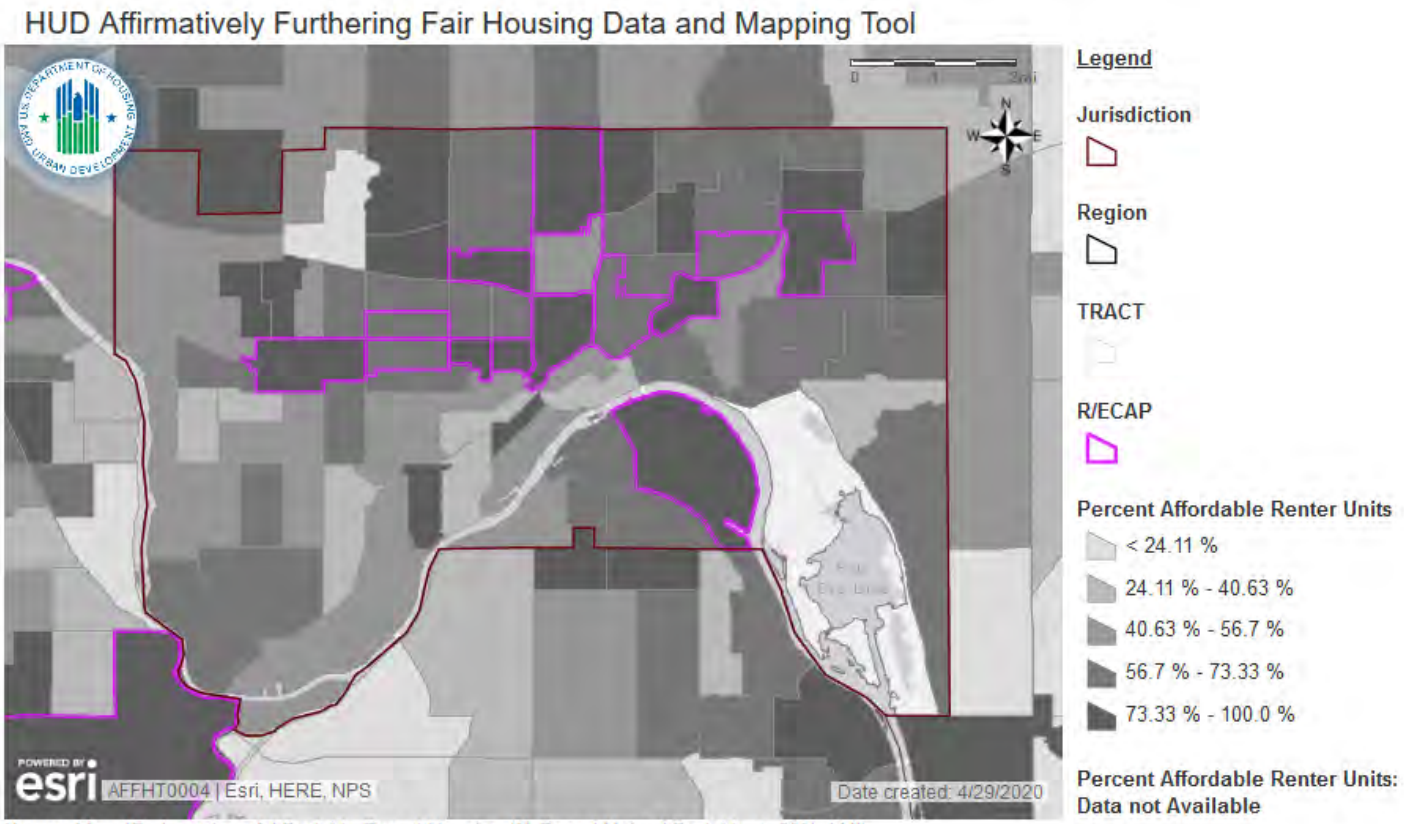
Description: Map of percent of rental units affordable, defined as units renting at or less than 30% of household income for a household with income at 50% of AMI.

Jurisdiction: Ramsey County (CDBG)

Region: Minneapolis-St. Paul-Bloomington, MN-WI

HUD-Provided Data Version: AFFHT0004

Map 10: Location of Affordable Rental Housing, St. Paul



Name: Map 17 - Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

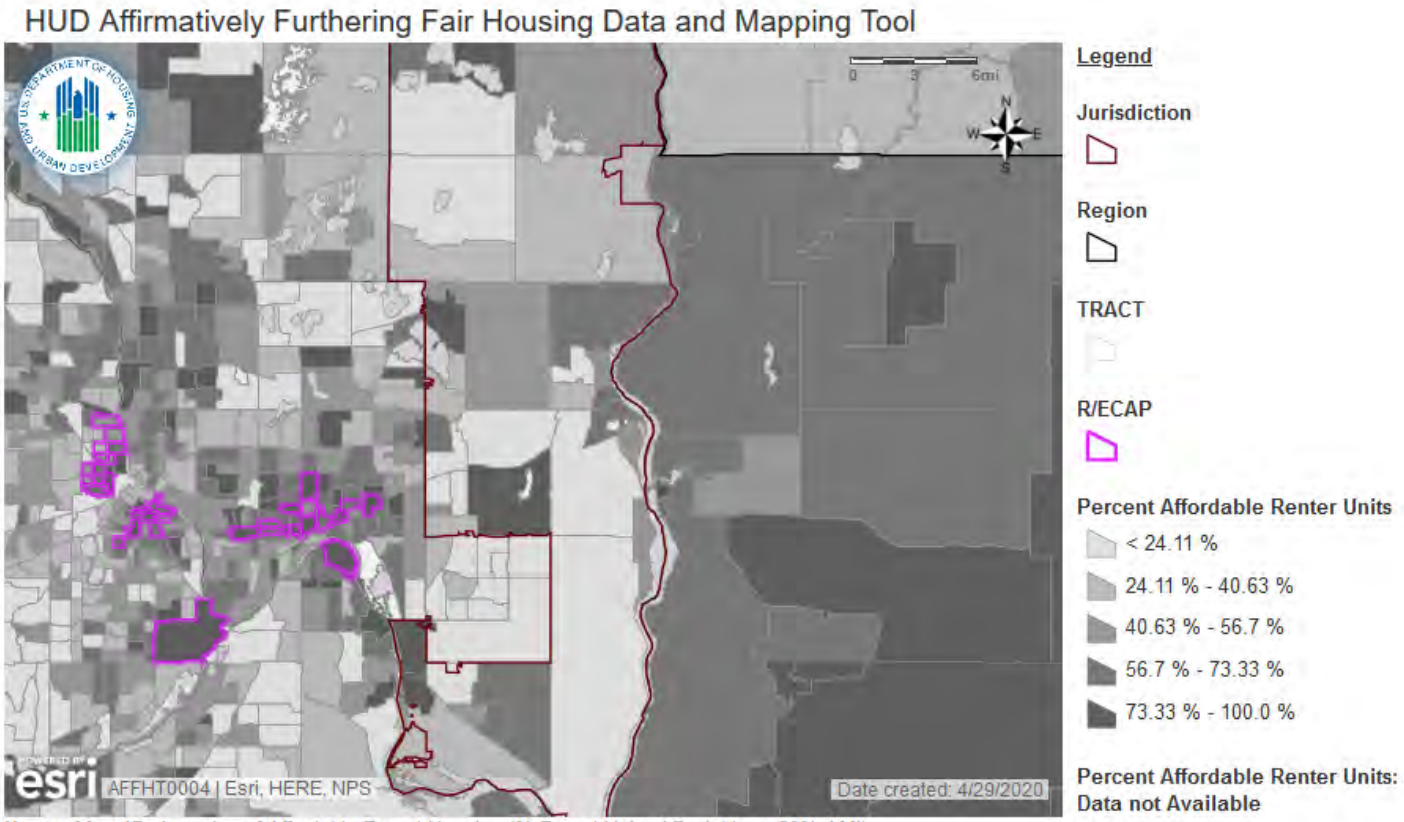
Description: Map of percent of rental units affordable, defined as units renting at or less than 30% of household income for a household with income at 50% of AMI.

Jurisdiction: St Paul (CDBG, HOME, ESG)

Region: Minneapolis-St. Paul-Bloomington, MN-WI

HUD-Provided Data Version: AFFHT0004

Map 11: Location of Affordable Rental Housing, Washington County



Name: Map 17 - Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

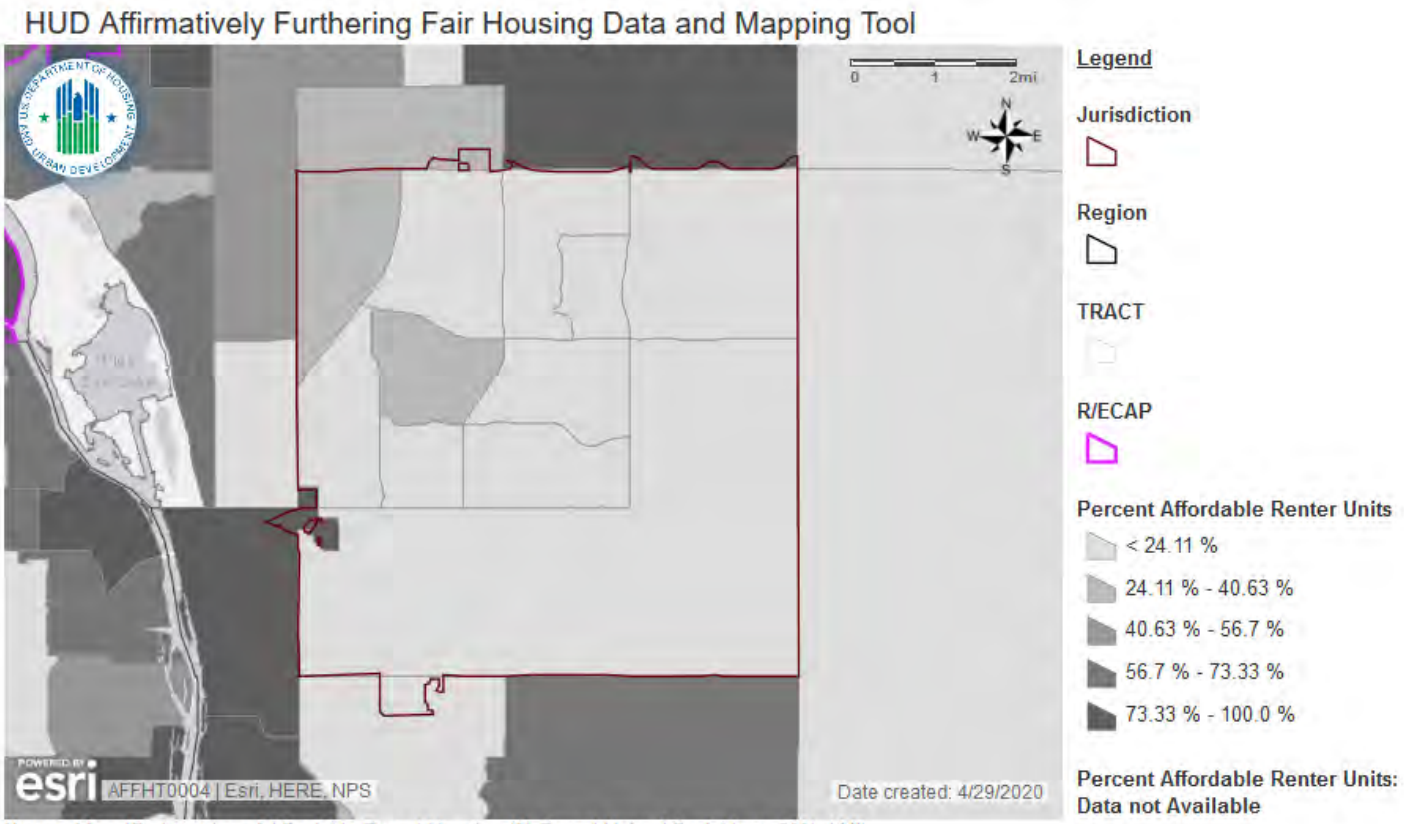
Description: Map of percent of rental units affordable, defined as units renting at or less than 30% of household income for a household with income at 50% of AMI.

Jurisdiction: Washington County (CDBG)

Region: Minneapolis-St. Paul-Bloomington, MN-WI

HUD-Provided Data Version: AFFHT0004

Map 12: Location of Affordable Rental Housing, Woodbury



Name: Map 17 - Location of Affordable Rental Housing (% Rental Units Affordable to 50% AMI)

Description: Map of percent of rental units affordable, defined as units renting at or less than 30% of household income for a household with income at 50% of AMI.

Jurisdiction: Woodbury City (CDBG)

Region: Minneapolis-St. Paul-Bloomington, MN-WI

HUD-Provided Data Version: AFFHT0004

Table 1: Public Housing Demographics, Anoka County

Project-Based Section 8						
(Anoka County, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White Residents**	**Black Residents**	**Hispanic Residents**	**Asian Residents**	**Households with Children**
Grasslands	24	91	5	0	N/a	9
Abbey Field	42	87	3	5	5	82
Mississippi View Apartments	93	81	16	1	1	51
Northgate Woods	75	76	22	1	N/a	39
Osborne Apartments, Inc.	60	82	4	4	7	N/a
Oxbowl Bend Apartments	60	94	5	2	N/a	N/a
Sunny Acres Estates	52	65	26	2	N/a	70
Walker On The River	45	98	N/a	2	N/a	N/a
Drake Apartments	48	74	19	2	2	84
Village Green Family	195	65	32	3	N/a	23
Heights Manor	85	90	7	1	N/a	5
Bridge Square Apartments	101	97	1	1	N/a	N/a
Dublin Park Apartments	89	100	N/a	0	N/a	N/a
Galway Place	36	68	24	6	3	80
Other Multifamily Assisted Housing						
(Anoka County, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Asi Anoka County	12	100	N/a	0	N/a	N/a
Norwood Square	50	86	4	4	4	N/a
Columbia Village	39	87	5	5	3	N/a
North Gables Senior Housing	49	94	N/a	2	4	N/a

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 2: Public Housing Demographics, Dakota County

Public Housing								
(Dakota County, MN CDBG) Jurisdiction								
Development Name	**PHA Code**	**PHA Name**	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Portland N&S/Biscayne Townhomes/Office	MN147	Dakota County Cda	243	46	43	5	6	86
John Carroll	MN010	Hra Of The City Of South St Paul, Minnesota	166	82	12	4	1	N/a
Colleen Loney Manor	MN147	Dakota County Cda	80	67	15	10	6	N/a
Nan Mckay	MN010	Hra Of The City Of South St Paul, Minnesota	132	75	13	8	2	N/a

Project-Based Section 8						
(Dakota County, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Rosemount Plaza	39	72	14	6	8	N/a
Spruce Place Apartments	60	91	9	0	N/a	N/a
Rosemount Townhouses	28	56	44	0	N/a	88
Greenvale Place	96	68	27	3	2	30
Jefferson Square	50	76	10	12	N/a	85
Northfield Manor	63	95	N/a	2	2	N/a
Three Links Apartments	82	99	N/a	1	N/a	N/a
Mount Carmel Manor	60	54	10	36	N/a	2
Oak Ridge Manor	109	95	2	1	1	N/a

Prairie Estates	40	50	35	9	3	85
Camber Hill	44	41	39	15	2	90
Apple Valley Villa	72	97	1	0	1	N/a
Oaks Of Apple Valley	56	34	56	4	6	54
Chancellor Manor	196	15	83	1	1	59
Chowen Bend Townhomes	32	33	63	0	3	83
Cliff Hill Townhomes	32	50	50	0	N/a	66
Dakota'S Adult'S, Inc.	12	82	9	0	9	N/a
Fairfield Terrace	24	80	8	0	8	N/a
Horizon Heights Townhouses	25	36	64	0	N/a	81

Other Multifamily Assisted Housing

(Dakota County, MN CDBG) Jurisdiction

Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
Ebenezer Ridge Point	42	95	3	0	3	N/a
West Apartments	24	70	26	4	N/a	9
Leah'S Apartments	17	56	33	6	6	6
Apple Grove Court	16	94	N/a	0	6	N/a
Prairie View Heights	39	87	8	5	N/a	N/a
Park Ridge Apartments	20	100	N/a	0	N/a	N/a
Wellstone Commons	29	90	3	7	N/a	N/a

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 3: Public Housing Demographics, Hennepin County

Public Housing								
(Hennepin County, MN CDBG) Jurisdiction								
Development Name	**PHA Code**	**PHA Name**	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Indian Knoll Manor	MN074	Hra Of The City Of Mound, Minnesota	50	93	7	0	N/a	2
Dow Towers	MN078	Hra Of Hopkins, Minnesota	76	64	27	3	5	N/a
Louisiana Court	MN144	Housing Authority Of St Louis Park, Minnesota	159	47	48	2	2	28

Project-Based Section 8						
(Hennepin County, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Dover Hill Apartments	0	N/a	N/a	N/a	N/a	N/a
Minnetonka Th'S Aka Elmbrooke	46	32	62	2	4	72
Emerson Chalet	18	18	71	6	6	30
Ewing Square Townhomes	23	0	95	0	5	76
Golden Valley Townhouses	8	N/a	N/a	N/a	N/a	N/a
Hickory Ridge	32	26	70	4	N/a	85
Hillside Terrace - Long Lake	44	100	N/a	0	N/a	15
Walnut Place	30	87	10	3	N/a	74
South Shore Park	67	97	3	0	N/a	N/a
North Park Plaza	104	86	8	1	2	N/a
Pleasant Place	24	91	N/a	5	N/a	N/a

Sheridan Court	30	97	3	0	N/a	N/a
South Haven	100	86	8	1	4	N/a
Lilac Pkwy Apts	48	72	24	0	2	N/a
Lou Park Apartments	32	88	12	0	N/a	27
Oak Glen Of Edina	26	33	59	0	7	74
Oak Park Village Apartments	100	32	68	0	N/a	54
Richfield Towers	150	64	20	1	14	N/a
Robbins Landing	110	58	40	2	N/a	8
Hopkins Village	64	77	11	2	6	2
Maple Terrace	38	94	3	0	3	N/a
Medley Park	30	78	22	0	N/a	56
Menorah Plaza	154	92	5	3	1	N/a
Menorah West	45	93	7	0	N/a	N/a
Wildwood Apartments	18	50	50	0	N/a	88
Calvary Center Apartments	80	89	8	0	3	N/a
Winnetka West Aka New Hope Np Hsing	26	85	12	4	N/a	8
Summit Point	29	97	3	0	N/a	N/a
Yorkdale Townhomes	90	33	65	3	N/a	68
Yorktown Continental	179	71	11	3	15	N/a
Boardwalk	77	92	6	1	N/a	N/a
Bnr	222	30	66	0	2	31
Park Haven Apts. (Aka Carriage Hous	123	7	90	2	2	59
Westonka Estate	42	95	N/a	3	3	N/a
The Cunningham	25	87	13	0	N/a	4
Unity Place	112	9	86	3	1	81
Raspberry Ridge	101	31	61	5	3	39

Walker On Kenzie	45	91	7	0	2	N/a

Other Multifamily Assisted Housing						
(Hennepin County, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Four Seasons Community Housing	7	N/a	N/a	N/a	N/a	N/a
Arbor Lakes	49	86	4	2	8	N/a
Autumn Trails Of Rogers	20	95	5	0	N/a	N/a
Sonoma Apartments	24	85	12	0	4	4
Hayden Lake/Wiggins Apartments	23	91	9	0	N/a	5
Meadow Trails Apartments	17	88	6	0	6	6
Fraser Hopkins Court	14	93	N/a	0	7	N/a
Pesch Place	5	N/a	N/a	N/a	N/a	N/a
Robert Will Community Housing	11	82	18	0	N/a	N/a
Evergreen Apartments	22	75	25	0	N/a	N/a
Robbins Way Senior Housing	36	54	40	3	3	N/a
Asi Hennepin County	4	N/a	N/a	N/a	N/a	N/a

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 4: Public Housing Demographics, Bloomington

Project-Based Section 8						
(Bloomington, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Newton Manor	45	95	2	0	2	N/a
Blooming Glen Townhomes	50	33	45	2	19	57
Highlands Apts Aka Bloomington Fami	28	38	58	0	4	69
Bloomington Barrier Free Hsg	24	87	9	0	N/a	N/a
L.W. Fraser Indep Living Prj 2 - Ly	30	96	4	0	N/a	N/a
Ridgeview Terrace	51	86	8	2	4	N/a
Bloomington Housing	306	66	12	1	20	16

Other Multifamily Assisted Housing						
(Bloomington, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Metro Apartments	23	72	28	0	N/a	N/a
Nhhi-Senior Bloomington, Inc.	49	76	10	2	12	N/a
Penelope 35	41	88	5	0	7	N/a
Garfield Commons	20	85	15	0	N/a	5
Penelope 35 Ii Apartments	36	72	N/a	0	28	N/a

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 5: Public Housing Demographics, Eden Prairie

Project-Based Section 8						
(Eden Prairie, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Edendale Residence, Inc.	61	87	5	3	5	N/a
Prairie Meadows	168	9	84	0	7	53
Briarhill Apartments	124	25	69	0	6	54

Table 6: Public Housing Demographics, Minneapolis

Public Housing								
(Minneapolis, MN CDBG) Jurisdiction								
Development Name	**PHA Code**	**PHA Name**	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Glendale	MN002	Pha In And For The City Of Minneapolis	183	6	86	1	7	71
Northeast	MN002	Pha In And For The City Of Minneapolis	941	41	49	3	5	0
Hiawatha	MN002	Pha In And For The City Of Minneapolis	884	13	84	1	1	2
Cedar	MN002	Pha In And For The City Of Minneapolis	892	9	78	2	10	2
Horn	MN002	Pha In And For The City Of Minneapolis	936	12	85	1	1	3
Heritage Park	MN002	Pha In And For The City Of Minneapolis	200	3	90	1	4	91
Scattered Sites	MN002	Pha In And For The City Of Minneapolis	750	5	76	2	14	85
North	MN002	Pha In And For The City Of Minneapolis	1342	21	69	3	6	1

Project-Based Section 8						
(Minneapolis, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Ebenezer Park Apartments	200	49	35	12	3	2
Ebenezer Tower	91	62	33	2	2	N/a
Elliot Park Apartments	30	0	97	3	N/a	73
Holmes Greenway	50	82	12	4	N/a	4
Holmes Park Village	107	63	33	2	N/a	22
Albright Townhomes	89	10	86	0	1	46
Accessible Space, Inc,	30	74	19	0	4	N/a

Nicollet Towers	306	62	32	2	2	9
Stevens House Apartments (Fka Steve	56	2	59	0	39	43
Plymouth Ave. Townhomes	136	3	96	0	N/a	63
St. Paul'S Home	53	33	54	4	N/a	N/a
Stevens Community	59	25	73	2	N/a	12
Stonehouse Square Apartments	19	33	44	6	N/a	67
Talmage Green	26	7	85	4	4	75
Teamster Manor Minneapolis	24	67	33	0	N/a	17
Maryland Apartments	79	59	35	3	3	10
Matthews Park	24	15	75	10	N/a	75
Seward Tower East	307	9	89	0	0	11
Seward Tower West	316	8	92	0	N/a	19
Kosciolek House	15	85	8	0	8	N/a
Labor Retreat	77	79	17	0	1	N/a
Loring Towers Apartments	187	18	71	6	3	16
Loring 100 Apartments	107	59	33	0	4	1
Oak Haven Townhomes	10	9	73	9	9	54
Oakland Square	31	0	100	0	N/a	60
Olson Towne Homes	92	1	47	0	52	46
Parkview Apts - - (Mpls) Aka Bethune	222	5	94	1	N/a	39
Phillips Tower	88	15	84	1	N/a	1
Riverbluff Townhomes	30	10	90	0	N/a	66
Riverside Plaza	669	4	86	0	10	32
Seward Square	81	47	53	0	N/a	8
Madison Apartments	51	4	93	0	N/a	69
Whittier Townhomes	12	0	67	0	33	67
Chicago Avenue Apartments	60	5	95	0	N/a	28
Creek Terrace	16	69	15	15	N/a	15

Whittier Community Housing	45	30	45	7	18	55
18th And Clinton Townhomes	8	N/a	N/a	N/a	N/a	N/a
Abbott View Aka Stevens Court	20	68	11	16	N/a	16
Village At Franklin Station	90	16	58	3	7	12
Little Earth	212	0	2	5	0	70
Booth Manor Residence	100	87	9	1	3	N/a
Diamond Hill Th'S Aka Bossen Terrac	66	8	84	2	2	72
Cecil Newman	64	2	95	0	2	72
West Bank Homes Iii	8	N/a	N/a	N/a	N/a	N/a
West Bank Homes	65	11	84	0	5	59
Trinity Elderly	120	71	19	1	1	5
Other Multifamily Assisted Housing						
(Minneapolis, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Home Share	22	81	14	5	N/a	N/a
Ford House, Inc.	11	82	9	0	9	N/a
N/a	35	76	12	6	6	N/a
Walker On Lyndale	49	67	25	2	6	N/a
Kingsley Commons	23	76	19	0	N/a	5
Becklund Outreach Elliot House	3	N/a	N/a	N/a	N/a	N/a
Riverview Apartments Senior Housing	42	77	8	5	3	N/a
Bii Di Gain Dash Anwebi Elder	47	2	55	0	N/a	N/a
Snelling Avenue Apartments	60	37	59	0	2	2

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 7: Public Housing Demographics, Minnetonka

Project-Based Section 8						
(Minnetonka, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Glen Lake Landing	97	93	1	1	4	N/a
Minnetonka Heights	90	71	28	0	1	15
Hunter'S Ridge Apartments	25	77	14	0	5	64
Cedar Hills Townhomes	30	43	54	0	N/a	46

Other Multifamily Assisted Housing						
(Minnetonka, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Excelsior Court	23	100	N/a	0	N/a	N/a
Boulevard Gardens Senior Housing	45	93	2	0	2	N/a

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 8: Public Housing Demographics, Plymouth

Public Housing								
(Plymouth, MN CDBG) Jurisdiction								
Development Name	**PHA Code**	**PHA Name**	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Mhop	MN002	Pha In And For The City Of Minneapolis	112	21	74	0	5	81

Project-Based Section 8						
(Plymouth, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Kimberly Meadow	39	61	26	0	11	52
Mission Oaks Townhomes	26	58	42	0	N/a	79
Willow Wood Estates	40	37	59	5	N/a	68

Other Multifamily Assisted Housing						
(Plymouth, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Bassett Creek Commons	45	87	7	2	4	N/a

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 9: Public Housing Demographics, Ramsey County

Project-Based Section 8						
(Ramsey County, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Concordia Arms	125	79	13	4	3	N/a
Coventry Apartments	195	54	42	1	2	21
Crossroads Of New Brighton	172	68	25	1	5	21
Franklyn Park	117	93	5	2	N/a	N/a
The Meadowlands Aka Crossroads Of S	44	42	42	2	12	86
Roseville Seniors	127	88	4	1	4	N/a
Maple Pond Homes	121	43	50	7	1	34
Century Hills	55	64	18	11	5	65
Maple Knoll Townhomes	57	54	41	6	N/a	69
Maplewood Gardens	29	17	79	0	N/a	75
Vadnais Highlands	35	47	41	0	6	97
Washington Square	81	97	N/a	1	1	N/a
Garden Terrace	41	83	12	2	2	2
Wildwood Manor	40	90	3	5	N/a	N/a
Other Multifamily Assisted Housing						
(Ramsey County, MN CDBG) Jurisdiction						
Development Name	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Asi Ramsey	8	N/a	N/a	N/a	N/a	N/a
Thorndale Plaza	24	83	13	0	4	8
Willow Wood	45	98	N/a	0	2	N/a
Roselawn Village Apartments	22	77	18	0	5	N/a

Garden Terrace Commons	35	89	8	3	N/a	N/a
Mounds View Gables	19	94	N/a	0	6	N/a
Century Trail	40	85	8	5	3	N/a

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 10: Public Housing Demographics, St. Paul

Public Housing								
(St Paul, MN CDBG) Jurisdiction								
Development Name	**PHA Code**	**PHA Name**	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Ravoux Hi-Rise	MN001	Public Housing Agency Of The City Of St Paul	509	38	40	2	20	8
Dunedin Terrace	MN001	Public Housing Agency Of The City Of St Paul	574	45	33	8	13	17
Scattered	MN001	Public Housing Agency Of The City Of St Paul	360	3	23	1	73	82
Roosevelt Homes	MN001	Public Housing Agency Of The City Of St Paul	320	6	35	3	56	63
Mount Airy	MN001	Public Housing Agency Of The City Of St Paul	613	12	42	4	42	45
Exchange Hi-Rise	MN001	Public Housing Agency Of The City Of St Paul	265	47	41	5	5	N/a
Mcdonough Homes	MN001	Public Housing Agency Of The City Of St Paul	580	5	39	3	52	82
Hamline Hi-Rise	MN001	Public Housing Agency Of The City Of St Paul	479	45	43	3	8	1

Edgerton Hi-Rise	MN001	Public Housing Agency Of The City Of St Paul	556	50	27	6	17	0

Project-Based Section 8

(St Paul, MN CDBG) Jurisdiction

Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
Afton View	268	3	93	2	2	66
Como By The Lake	57	55	32	9	4	N/a
Etna Woods	20	20	53	13	13	93
Maryland Park	143	9	75	12	4	53
Dale Street Place	82	33	59	7	N/a	N/a
Rivertown Commons-St. Paul	28	10	70	10	7	66
Rockwood Place	109	69	29	2	N/a	N/a
St. Albans Park	24	12	88	0	N/a	63
Community Plaza	40	0	97	3	N/a	91
Mears Park Place Apartments	50	65	24	8	2	N/a
Ramsey Commons	16	53	47	0	N/a	N/a
Birmingham	21	14	62	5	19	67
Capitol Plaza South Apts.	36	35	55	6	3	51
Grand Pre'	43	20	78	2	N/a	49
Hanover Townhomes	96	12	59	1	29	41
Heritage House	58	65	26	4	5	N/a
Jamestown Apartments	73	7	91	0	N/a	63
Labor Plaza	67	40	6	52	N/a	N/a
Lewis Park Apartments	103	41	50	6	2	19
Lonnie Adkins Court	57	6	85	2	8	56
Lyngblomsten Apartments	105	97	N/a	0	N/a	N/a
Cathedral Hill Homes	60	12	88	0	N/a	52

Sherman-Forbes Housing	104	22	56	14	1	50
Skyline Towers	448	3	91	2	4	29
Nhhi-St. Paul Barrier Free Hsg Aka	36	63	34	3	N/a	6
St. Philip'S Gardens	41	8	85	5	N/a	64
Torre De San Miguel	124	7	58	10	25	80
Vista Village	46	11	70	11	N/a	43
Westminster Place	90	10	75	3	11	44
S E Hall - Whitney Young Plaza	45	15	74	0	11	N/a
Wilder Square	54	37	52	2	10	13
Wilder Square Coop	48	17	70	13	N/a	48
Wilkins Townhomes	23	5	73	5	N/a	87
Wilder 202 Apartments	121	56	19	17	3	N/a
Winslow Commons	121	63	10	3	23	1
Women'S Advocates	12	6	94	0	N/a	50
Central Towers, Inc.	126	58	25	5	8	N/a
Liberty Plaza	78	4	83	1	12	65

Other Multifamily Assisted Housing

(St Paul, MN CDBG) Jurisdiction

Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
Midway Pointe	49	61	14	2	22	N/a
Harry And Jeanette Weinberg	45	89	11	0	N/a	N/a
Elders Lodge	43	24	11	5	3	N/a
Arlington Gardens Apartments	49	16	4	4	76	2
Seabury	49	55	33	0	12	N/a
Carty Heights	49	19	40	0	40	N/a
Kings Crossing	49	9	40	0	49	N/a

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 11: Public Housing Demographics, Washington County

Public Housing

(Washington County, MN CDBG) Jurisdiction

Development Name	PHA Code	PHA Name	# Units	White	Black	Hispanic	Asian	Households with Children
Whispering Pines	MN212	Washington County Hra	40	97	3	0	N/a	N/a

Project-Based Section 8

(Washington County, MN CDBG) Jurisdiction

Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
Kilkenny Court	91	97	N/a	2	N/a	1
Raymie Johnson Estates	120	96	1	1	2	15
Red Rock Manor	24	92	N/a	0	4	N/a
Rivertown Commons	96	97	N/a	1	N/a	1
East Shore Place	61	90	7	0	3	N/a
Gentry Place	48	27	42	0	29	84
Waterford Townhouses	31	73	23	3	N/a	83
Westridge Townhomes	42	88	5	5	N/a	90
Westview Apartments	32	85	4	4	4	45
Victoria Villa	40	86	6	9	N/a	57
Woodmount Townhouses	50	68	20	6	6	78
Birchwood Townhouse Apts, Ldp	49	88	6	4	2	61
Century North	168	42	49	7	2	58
Charter Oak Townhomes	60	66	29	0	5	74
Lincoln Place Aka Diamond Estates	48	29	62	4	N/a	84

Other Multifamily Assisted Housing

(Washington County, MN CDBG) Jurisdiction

Development Name	# Units	White	Black	Hispanic	Asian	Households with Children
Oak Terrace	50	90	2	6	2	N/a
Hillcrest Apartments	24	87	8	0	4	4

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Table 12: Public Housing Demographics, Woodbury

Public Housing								
(Woodbury City, MN CDBG) Jurisdiction								
Development Name	**PHA Code**	**PHA Name**	**# Units**	**White**	**Black**	**Hispanic**	**Asian**	**Households with Children**
Scattered Site	MN212	Washington County Hra	65	48	49	2	N/a	71

Sources: Inventory Management System (IMS)/PIH Information Center (PIC), 2016; Tenant Rental Assistance Certification System (TRACS), 2016; Low Income Housing Tax Credit (LIHTC) database, 2014

Additional Units, Built 2017-2018

2017-2018 Additional PSH Units: Anoka County

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
New Production: Homeownership	2018	Anoka County	Single Family/Habitat for Humanity	0	1	0
Preservation/Stabilization: Rental	2018	Anoka County	North Pointe Townhomes	0		15
New Production: Homeownership	2017	Anoka County	Single Family/Habitat for Humanity	0	4	0

Source: HousingLink.org

2017-2018 Additional PSH Units: Coon Rapids

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
Preservation/Stabilization: Rental	2018	Coon Rapids	Northstar Ridge	0	0	56
Preservation/Stabilization: Rental	2018	Coon Rapids	Riverdale Station	7	48	0

Source: HousingLink.org

2017-2018 Additional PSH Units: Dakota County

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
New Production: Rental	2018	Dakota County	Prestwick Place Townhomes	0	25	15
Preservation/Stabilization: Rental	2018	Dakota County	Westview Park Apartments (Oakdale)	0	9	0

Source: HousingLink.org

2017-2018 Additional PSH Units: Hennepin County

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
New Production: Rental	2018	Hennepin County	Bottineau Ridge Phase II	14	36	0
New Production: Homeownership	2018	Hennepin County	Single Family/Homes Within Reach	0	2	0
New Production: Homeownership	2018	Hennepin County	Single Family/Homes Within Reach	0	0	1

New Production: Homeownership	2018	Hennepin County	Single Family/Homes Within Reach	0	1	0
Preservation/Stabilization: Rental	2018	Hennepin County	Carrington Drive	0	0	128
Preservation/Stabilization: Rental	2018	Hennepin County	Maple Lakes Townhomes (fka Weaver Lake TH)	0	0	35

Source: HousingLink.org

2017-2018 Additional PSH Units: Bloomington

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
New Production: Homeownership	2018	Bloomington	Single Family/Homes Within Reach	0		1
New Production: Homeownership	2017	Bloomington	Single Family/Habitat for Humanity	0	1	0
New Production: Homeownership	2017	Bloomington	Single Family/Homes Within Reach	0	1	0

Source: HousingLink.org

2017-2018 Additional PSH Units: Eden Prairie

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
New Production: Rental	2018	Eden Prairie	Elevate	0	45	0
New Production: Homeownership	2018	Eden Prairie	Single Family/Homes Within Reach	0	1	0
New Production: Homeownership	2017	Eden Prairie	Single Family/Homes Within Reach	0	0	1

Source: HousingLink.org

2017-2018 Additional PSH Units: Minneapolis

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
New Production: Rental	2018	Minneapolis	East Town Apartments	0	0	169
New Production: Rental	2018	Minneapolis	Great River Landing	54	18	0
New Production: Rental	2018	Minneapolis	Green on Fourth Apartments (aka Boeser Site, Prospect North Gardens)	0	49	17
New Production: Rental	2018	Minneapolis	Hook & Ladder Apartments	10	0	108
New Production: Rental	2018	Minneapolis	Minnehaha Commons	0	44	0
New Production: Rental	2018	Minneapolis	Minnehaha Townhomes	116	0	0
New Production: Rental	2018	Minneapolis	New Vision LLC	0	10	9
New Production: Homeownership	2018	Minneapolis	Single Family/CLCLT	7	6	3
Preservation/Stabilization: Rental	2018	Minneapolis	17XX 3rd Avenue South	0	0	12
Preservation/Stabilization: Rental	2018	Minneapolis	19XX Colfax Avenue South	0	0	12

Preservation/Stabilization: Rental	2018	Minneapolis	19XX Vincent Avenue North	0	0	13
Preservation/Stabilization: Rental	2018	Minneapolis	24XX Golden Valley Road	0	0	11
Preservation/Stabilization: Rental	2018	Minneapolis	27XX Grand Avenue South	0	0	12
Preservation/Stabilization: Rental	2018	Minneapolis	27XX Humboldt Avenue South	0	0	11
Preservation/Stabilization: Rental	2018	Minneapolis	29XX 18th Avenue South	0	0	12
Preservation/Stabilization: Rental	2018	Minneapolis	620 Cedar Avenue Modernization	116	0	0
Preservation/Stabilization: Rental	2018	Minneapolis	Albright Townhomes	89	0	0
Preservation/Stabilization: Rental	2018	Minneapolis	Dundry Hope Block Stabilization Phase II	7	5	0
Preservation/Stabilization: Rental	2018	Minneapolis	Folwell Park Apartments	0	0	31
Preservation/Stabilization: Rental	2018	Minneapolis	France & Ewing Ave South	0	0	25
Preservation/Stabilization: Rental	2018	Minneapolis	The Louis Apartments (aka Aeon Prospect Park)	16	29	18
Preservation/Stabilization: Rental	2018	Minneapolis	Riverside Homes	0	0	191
Preservation/Stabilization: Rental	2018	Minneapolis	St. Anthony Apartments	0	0	68
New Production: Rental	2017	Minneapolis	1500 Nicollet	0	37	146
New Production: Rental	2017	Minneapolis	Augsburg Apts Karinplas	0	0	16
New Production: Homeownership	2017	Minneapolis	Single Family/CLCLT	6	4	5
New Production: Homeownership	2017	Minneapolis	Single Family/Habitat for Humanity	0	3	0
Preservation/Stabilization: Rental	2017	Minneapolis	Canadian Terrace	19	0	0
Preservation/Stabilization: Rental	2017	Minneapolis	Ebenezer Park Apartments	0	200	0
Preservation/Stabilization: Rental	2017	Minneapolis	Midtown Exchange	0	62	116
Preservation/Stabilization: Rental	2017	Minneapolis	Portland Village	22	4	0
Preservation/Stabilization: Rental	2017	Minneapolis	PPL Foreclosure Redirection	0	4	0
Preservation/Stabilization: Rental	2017	Minneapolis	Saint Annes Senior Housing	4	21	35

Source: HousingLink.org

2017-2018 Additional PSH Units: Minnetonka

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
New Production: Rental	2018	Minnetonka	Dominium Apartments	0	0	482
New Production: Rental	2018	Minnetonka	Marsh Run	0	35	0

New Production: Homeownership	2018	Minnetonka	Single Family/Homes Within Reach	0	0	1
New Production: Homeownership	2017	Minnetonka	Single Family/Homes Within Reach	0	1	1

Source: HousingLink.org

2017-2018 Additional PSH Units: Plymouth

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
New Production: Homeownership	2018	Plymouth	Single Family/Habitat for Humanity	0	1	0
Preservation/Stabilization: Rental	2018	Plymouth	Vicksburg Commons	8	42	0

Source: HousingLink.org

2017-2018 Additional PSH Units: Ramsey County

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
New Production: Rental	2018	Ramsey County	Edison Apartments	4	1	53
Preservation/Stabilization: Rental	2018	Ramsey County	Provinces/AEON	0	0	118
Preservation/Stabilization: Rental	2018	Ramsey County	Maplewood Gardens Apartments	0	0	29
Preservation/Stabilization: Rental	2018	Ramsey County	Cedarview Commons	0	0	204

Source: HousingLink.org

2017-2018 Additional PSH Units: St. Paul

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
New Production: Rental	2018	St. Paul	Rice Street Flats	0	16	27
New Production: Rental	2018	St. Paul	Technology Park Apartments	0	0	66
New Production: Homeownership	2018	St. Paul	Single Family/Habitat for Humanity	0	1	0
Preservation/Stabilization: Rental	2018	St. Paul	Como By the Lake	0	57	37
New Production: Rental	2017	St. Paul	1500 Thomas	0	0	51
New Production: Rental	2017	St. Paul	72 Cesar Chavez	4	0	36
New Production: Rental	2017	St. Paul	Dorothy Day Phase I	193	0	0
New Production: Rental	2017	St. Paul	Dorothy Day Phase II (Residence)	92	85	0
New Production: Rental	2017	St. Paul	East Side Apartments	0	23	91
New Production: Rental	2017	St. Paul	Euclid View Flats	0	0	12
New Production: Rental	2017	St. Paul	Larpenteur Villas	0	0	82
New Production: Rental	2017	St. Paul	McDonough Public Housing Six Plexes	12	0	0
New Production: Rental	2017	St. Paul	Pioneer Press Building	0	0	143

New Production: Rental	2017	St. Paul	Selby/Victoria	25	8	0
New Production: Rental	2017	St. Paul	Union Flats	0	0	217
New Production: Homeownership	2017	St. Paul	Single Family/Habitat for Humanity	0	5	0
Preservation/Stabilization: Rental	2017	St. Paul	Families First Model Cities SHRP	0	20	0
Preservation/Stabilization: Rental	2017	St. Paul	Hanover Townhomes	90	0	0
Preservation/Stabilization: Rental	2017	St. Paul	University Dale Apartments	10	10	60

Source: HousingLink.org

2017-2018 Additional PSH Units: Washington County

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
New Production: Homeownership	2018	Washington County	Single Family/Two Rivers	0	0	1
Preservation/Stabilization: Rental	2018	Washington County	Headwaters Landing	16	29	0
Preservation/Stabilization: Rental	2018	Washington County	Green Twig Villas II	0	15	57
New Production: Homeownership	2017	Washington County	Single Family/Two Rivers	0	2	0

Source: HousingLink.org

2017-2018 Additional PSH Units: Woodbury

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
Preservation/Stabilization: Rental	2018	Woodbury	The Glen at Valley Creek	5	37	0
New Production: Rental	2017	Woodbury	Legends of Woodbury	0	11	205

Source: HousingLink.org

2017-2018 Additional PSH Units: Scott County

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
New Production: Homeownership	2018	Scott County	Single Family/Habitat for Humanity	0	1	0
New Production: Rental	2017	Scott County	Pike Lake Marsh	4	0	64
New Production: Homeownership	2017	Scott County	Single Family/Habitat for Humanity	0	1	0

Source: HousingLink.org

2017-2018 Additional PSH Units: Carver County

Type of Housing	Year Added	Place	Name	30% AMI	50% AMI	60% AMI
New Production: Rental	2017	Carver County	Creek's Run Townhomes	4	32	0

Source: HousingLink.org

F. Public Comments Index

Equity in Place (EIP) is a diverse group of strategic partners from organizations led by people of color and housing advocacy organizations. Our work is centered around an understanding of the legacy and ongoing impact of structural racism on development and growth in the Twin Cities region and how it has undermined our communities' access to housing, property ownership, and wealth building opportunities. The only way we can begin to address our regional and state inequities is by bringing the expertise of impacted communities into decision making processes in meaningful and powerful ways.

We appreciate that the process of doing this round of the Regional Analysis of Impediments (RAI) to Fair Housing has been one that has better engaged organizations and communities that historically have not been well represented in the process historically. We also recognize that much work needs to be done to articulate pathways towards real accountability in how identifying these impediments will lead to systemic change and justice for renters, low wealth communities, and Black, Indigenous, and people of color (BIPOC).

We have broken down our comments by the different sections of the draft RAI.

Overview

- We appreciate the acknowledgement of investor forces who deploy their capital to create housing unaffordable to residents of color - and the acknowledgement that systemic racism within the region has led to strategic disinvestment in communities of color
- We believe the following items should be added to "Contributing Factors to Fair Housing Issues"
  - Gentrification that arises from the combination of private sector land/property speculation and public sector policies (opportunity zones, planning/zoning policies, tax incentives, etc) which prioritizes development that serves wealthier residents and works to displace lower wealth residents over time.
  - Lack of regulation of the private housing market, where the majority of fair housing issues exist.
  - Unwillingness of local governments to enact policy that regulates or impacts the private housing market, even as the market drives the creation of housing units that are largely unaffordable to people most in need.
  - Lack of meaningful engagement/listening/acting on voices/ideas/policy proposals of communities most deeply impacted by fair housing issues (by local governments.)

- Historically declining federal resources for housing infrastructure.
- Lack of political will to address root issues of racism/white supremacy in housing inequities in the region.
  - Imbalance of power between those who own land (predominantly white property owners) and those who rent housing on that land (disproportionately BIPOC.)

Proposed Goals

- Goal 1
  - The framing of neighborhoods and geographies with higher numbers of wealthy and white residents as “high opportunity” remains a problematic and false binary frame that labels neighborhoods with larger numbers of people of color and people of lower economic wealth as “low opportunity.” Instead, there is a need to articulate what are the actual descriptors of what are currently referred to as “high opportunity” areas. Namely, whiter, wealthier neighborhoods that have been on the receiving end of the privilege and power to access public and private investments that have not been equitably allocated to BIPOC communities.
  - This narrative also frequently leads to the following suggested “solution” to racial disparities: people of color can simply be “moved to opportunity” while ignoring the systemic barriers that people of color face across geographies in our region, including in whiter, wealthier parts of the region. Proximity does not equate to access.
  - We recognize this is a frame that has existed for a number of years and might be required by HUD that the consultant and the FHIC use in this report, but we encourage getting rid of this language at local, regional, state, and federal levels of government.
  - We would suggest that the FHIC consider modeling future analyses of geography/race/power/wealth by cities/counties after the Met Council’s method, which has a much more nuanced approach developed through conversations with community.
  - Additional suggestions:
    - Add “expand bonus point offerings in RFPs to incentivize the development of units at the deepest affordability levels.”
    - Require that government agencies assess affordability of housing with a recognition of different approaches needed to move towards equitable housing goals.
      - In lower-wealth neighborhoods that have experienced disinvestment, using a city or neighborhood median income measurement more accurately captures residents’ affordability needs than the area median income. For context, in many

predominantly BIPOC neighborhoods in the region, the median incomes levels are well below even 60% AMI, which means that affordable housing investment needs to be 30% AMI for units to be affordable to current residents.

- In wealthier parts of the region (see below for more on Racial Concentrated Areas of Affluence frame) using the AMI should be used to support the development of units that are affordable and accessible.

    - Highlight that not all of the solutions listed actually create “affordable housing” opportunities. For example, allowing ADUs does not create an affordable ADU. Allowing ADUs with affordability mandates or public subsidies has the potential to create affordability.
        - Add “increase public investments, including affordable housing investments in lower income, historically disinvested, neighborhoods to ensure that every community is one with opportunity.”
    - Require that any policy that increases supply of housing also includes a policy setting aside a significant portion of that supply for deep affordability.

- Goal 3
    - Go beyond “review” of local lending practices and demand change in discriminatory lending practices
    - Demand reparative actions for people who were targeted by predatory lending practices that led to foreclosure/homelessness/housing instability.

- Goal 4
    - Add “require that all cities have a land disposition policy that prioritizes deeply affordable housing development when environmentally feasible”
    - Fund grassroots community organizations led and represented by BIPOC communities who organize tenants and actively prevent the displacement of BIPOC communities
    - Cities should pursue Tenant Opportunity to Purchase (similar to Right of First Refusal) policies to provide a path for tenants and/or tenant-chosen preservation buyers to be able to purchase properties for sale, preserving the affordability of the units and preventing displacement of current residents. This should be paired with significant public resources to support these purchases.

- Goal 6

    - Increase support and capacity of nonprofit community and legal advocacy organizations to investigate and challenge discrimination in the housing system.

- Goal 8
    - Prohibit developments that receive public funding from setting rents above the voucher payment standard (unless the building is using income averaging and offsets higher rents with deep affordability.)

Policy and system change ideas that we are pleased to see in Goals:

- Right to counsel
- Just cause eviction
- Statewide rent control
- Source of income protections
- Elimination of crime free multi-housing program
- Requirement that all rental/homeownership applications be made available in multiple languages
- Statewide inclusive screening criteria that does not rely on FICO scores ● Funding for record expungement clinics
- Rental licensing and regular code enforcement review of all rental properties (like Minneapolis) instead of complaint-based enforcement services
- Prevent evictions from remaining on a tenant's record when eviction has been dismissed, reduction of time evictions remain on tenant's record from 7 to 2 years ● Restrict ability of landlords to evict during winter months
- Banning excessive security deposits or multiple months' rent

RECAPS

- If RECAPs must be kept as an assessment tool, then there is also a need to examine and include an analysis of Racially Concentrated Areas of Affluence (RCAAs), as outlined in CURA's research and mapping, and discuss the role they play in perpetuating racial inequities across the region. Focusing exclusively on RECAPs unfairly problematizes and stigmatizes BIPOC communities, while ignoring that the patterns of segregation, investment, wealth building/extraction that have occurred in our region historically (and continually) are the result of the politics and power that exist in segregated white communities.
- In addition to mapping, this analysis should include an explanation of the many institutions and systems who are complicit in perpetuating the existence of RECAPs through taking part in the disinvestment of communities and people. In other words, provide historical context so there can be an understanding why and how RECAPs were created.

We appreciate your consideration of our comments.

Sincerely,

Equity in Place

Equity in Place is convened by the Alliance and the Center for Urban and Regional Affairs. Members include: African Career, Education, and Resources, Inc. / American Indian Family Center / Community Stabilization Project / Frogtown Neighborhood Association / HOME Line / Hope Community / Housing Justice Center / Jewish Community Action / Metropolitan Consortium of Community Developers / Minnesotans Standing Together to End Poverty and Homelessness / Native American Community Development Institute / New American Development Center / Pueblos de Lucha y Esperanza / Urban Homeworks / South East Community Organization / West Side Community Organization

METROPOLITAN INTERFAITH COUNCIL ON AFFORDABLE HOUSING

"Do justice, love mercy, walk humbly with your God." Micah 6:8

MICAH

October 18, 2020

MICAH's Initial and Detailed Comments on the
Twin Cities Region Assessment of Fair Housing Draft

Thank you for the opportunity to share our initial comments and more detailed comments on the draft.

MICAH actively participated with the Lawyers' Committee for Civil Rights Under the Law by setting up meetings and providing contacts to listen and discuss fair housing issues with diverse communities experiencing homelessness and housing crises in the Twin Cities region and with our MICAH Chapters throughout the region.

1. **MICAH had requested a copy of the draft Twin Cities Region Assessment of Fair Housing be sent to us as soon as it was published. We received the draft just prior to Dakota and Washington County public comment meetings. We recognize we are all very busy with addressing COVID-19 challenges in our communities but MICAH was very disappointed we were not notified of its release on June 26, 2020. MICAH has worked on Fair Housing issues throughout the Twin Cities for 32 years. We are very concerned about the current process for community input in reviewing the draft.**
2. **We appreciate the excellent identification of most of the issues discussed in the listening sessions; but believe more details need to be provided for people to understand the recommendations. For example tiny home options, ADU (Accessory Dwelling Units) etc.**
3. **The charts and information sections provide very detailed information.**
4. **The proposed goals and strategies are suggestions/ aspirations not goals and strategies. To be goals and strategies they need to be operationalized by each County with the specific benchmarks, timelines, outcomes and resources to implement the goals and strategies.**
5. **We strongly encourage you to <u>NOT to accept or approve</u> the Twin Cities Region Assessment of Fair Housing Draft in its current format and that you require that goals and strategies section is updated with clear measurable goals and strategies including funding resources and dates to be completed. These strategies should be identified as goals and strategies in the Consolidated Plan and the accomplishments should be identified in every annual CAPER.**

MICAH's detailed analysis of the draft plan.

1. **The draft plan includes a very good summary of many positive actions taken by each community on the strategies outlined but <u>there was limited or no data on specific outcomes from those actions.</u> Page 29, provided specific outcomes HOME Line's Tenant Hotline resulting in $378,00 in damage deposits and rent abatements recovered and 244 evictions prevented. This type of detailed outcome information is critical to properly evaluate if the actions being taken by each community are significantly impacting housing choice and opportunities in every community in the region.**
2. **Each County and Community needs to identify goals in implementation of each strategy that are achievable and can be measured.**
3. **MICAH strongly supports the draft plan's "proposed goals and strategies" to address the impediments identified; but they are worded as are suggestions/ aspirations not goals and strategies. To be goals and strategies they need to be operationalized by each County/community with the specific benchmarks, timelines, outcomes and identified resources to implement the goals and strategies.**
4. **MICAH appreciates the excellent detailed charts and documentation of needs, the extensive outreach to our diverse communities and use of the public's input in the development of this document.**
5. **Pages 583-594. The charts visually demonstrate the concentration of affordable rental units in each community/county. Specific goals should be developed by each community to identify specific plans to provide housing choices and opportunities throughout their community/county.**
6. **Pages 595-611 Public Housing Units. In some of the larger developments, the number of people identified was significantly less than the number of units. Please explain.**
7. **Pages 611-614. Thank you for the information on income levels on additional PSH units built in 2017-2018. The income of people in the units tends to be either at 50% or below median or at 60% of median income with very few projects having a mixture of units at 30%, 50% and 60% of median income. MICAH strongly encourages communities to provide more income diversity in all of their developments by utilizing income averaging when using Low Income Housing Tax Credits and other funding resources.**

Gary Kwong, MICAH Board President
Additional Comments:
gary.kwongw@gmail.com, 10/17/2020

TWIN CITIES REGION ASSESSMENT OF FAIR HOUSING DRAFT

The report seems consistent in being a narrative and the various housing recommendations and actual currently existing housing programs not subject to an in depth analysis. Programs are described without any way of evaluating them.

It would have been helpful to have the number of attendees at the community engagement meetings and the number of people who spoke with questions or comments. Meetings without a measure of actual participation doesn't provide input from the community.

For example,

“Impediment: Potential homebuyers of color are denied for home purchase loans at rates exceeding White homebuyers.

Recommendations:

1. Development of partnerships with reputable credit counseling agencies and financial literacy trainers to reach communities of color and create pipeline of potential homebuyers who are ready and qualified to purchase a home.”

Each partner in the process should report how many clients were served. Having percentages for an activity is helpful but without knowing how many clients there were the percentage can be deceptive. 20% of 5 people is 1. 20% of 100 people is 20. An increase from 1 to 2 clients of 5 is a doubling or 100% but from 20 to 40 is also a doubling and 100% but much more significant in terms of impact.

Similarly, advertising as a part of outreach but not saying how many calls for information resulted (ask callers about a program how they heard about the program) is a start but what resulted?

Because public funds are being spent I assume that numbers are tracked but in this report they are not reported so improvement or decreasing success of a program cannot be accounted for.

For example, on p 16

“Dakota County: Since 2015, the Dakota County CDA has provided down payment assistance to 173 households. Homebuyers purchasing their first home in Dakota County can access: Fixed interest rate mortgage financing, Mortgage Credit Certificate, $8,500 in down payment and closing cost assistance, and Reduced Private Mortgage Insurance (PMI) with our conventional HFA preferred mortgage. Dakota County CDA has also partnered with Twin Cities Habitat for Humanity to redevelop vacant NSP lots which are then sold to qualified low income homebuyers.”

However, there is no mention of how many applicants there were for down payment assistance who were turned down, how many received counseling and then qualified for assistance. 173 households in 5 years or 260 weeks How many vacant NSP lots were redeveloped?

I would guess that this comment on 'Fair Housing Advisory Committee' is related to the actions taken upon complaint by MICAH, several cities, and neighborhood associations to HUD about the lack of desegregation in affordable housing in St Paul, Minneapolis, and the surrounding counties. Isn't an analysis of impediments supposed to include specific information about complaints to the cities and other entitlements and HUD with regard to housing, education, transportation, and employment?

I am unclear about the process used to notify community members about the various meetings to solicit input for the draft. I heard about this effort only after the first several meetings had occurred.

With regard to the many programs to meet the goals: there are no numbers consistently presented so that the programs can be graded vs one another to evaluate each in terms of relative improvement vs prior efforts and to prioritize what worked well enough vs other programs to decide whether to continue each particular program. In the current pandemic there are quite a few proposed vaccines but without an adequate numerical evaluation of side effects, ease of use, etc how many would voluntarily submit to taking the vaccine? Just saying a program was started and has continued does not show that it met the goal or need or how worthwhile it was in time, effort, and money.

Fair Housing Advisory Committee Recommendations

Following the conclusion of the formal AI process, several community groups expressed concern that the community engagement process did not sufficiently consult communities of color and other marginalized groups. As a result, Fair Housing Advisory Committee was formed, and an Addendum to the 2014 Analysis of Impediments to Fair Housing Choice was drafted. The impediments identified and the recommendations made to address them include:

Impediment: Access to housing is reduced for some groups.

Recommendations:

● Work toward enactment of local source of income protection legislation that specifically covering voucher holders.

● Collect and present local data to elected officials illustrating the need for source of income protection; advocate for such local legislation.

● Based on results of Responsible Banking study from U of M, withhold government business from poor-performing financial institutions.

● Develop partnerships with credit counseling agencies to reach communities of color and build a pipeline of potential homebuyers.

Starting about p 144 there is discussion of the School Proficiency Index.

“The School Proficiency Index compares the 4th grade test scores of elementary schools to the neighborhoods they live in or near to block-group level census data to determine which neighborhoods have access to proficient schools.” I assume the 4th grade test scores are for public elementary schools. The evaluation may be influenced by the disproportion number of White, more financially well-off parents sending their children to private schools. These absent from public school would raise the index for the well-off Whiter areas relative to the students in more segregated areas.

Be safe and well.
God's peace,
Sue Watlov Phillips M.A.
Executive Director, MICAH
President, National Coalition For The Homeless

Comments from the Institute on Metropolitan Opportunity on the Draft 2020 Regional Analysis of Impediments for the Twin Cities

In its current state, the Draft 2020 Regional Analysis of Impediments for the Twin Cities has several major deficiencies:[1]

- It omits recent HUD fair housing complaints of regional import, which in turn leads to the omission of several critical factors causing regional housing segregation. This includes specific policies, promulgated by the state and Metropolitan Council, for allocating housing subsidies and guiding regional housing development.
- It does not accurately characterize the relative roles of housing displacement and poverty concentration in the region, in part because it omits critical research context. It is essential that the AI correctly characterize the relative frequency of these phenomena.
- Most importantly, several of its fair housing strategies are unlikely to accomplish the stated goals of improving access to opportunity, producing affordable housing in high-opportunity areas, and reducing barriers to mobility. Moreover, there is also a risk that strategies intended to promote other goals, such as preserving affordable units, could undermine the goals listed above.

Curing these deficiencies would significantly improve the document.

Several other aspects of the Draft AI are improved from previous Analyses of Impediments adopted by Twin Cities jurisdictions.[2]In particular, its clearer focus on reducing segregation and increasing integration, fostering housing mobility and access to opportunity, more closely reflects the purpose of the Analysis of Impediment process and the "affirmatively further" requirements of the Fair Housing Act.[3] Twin Cities municipalities have often struggled to recognize and conform to these requirements. The Draft AI represents an important opportunity to change the direction of housing and land use policy in the Twin Cities, and foreground the region's decades-long failure to address its enclaves of opportunity and concentrations of poverty.

[1] LAWYERS' COMMITTEE FOR CIVIL RIGHTS UNDER LAW, TWIN CITIES REGION ASSESSMENT OF FAIR HOUSING DRAFT (2020) [hereinafter Draft AI].

[2] *See, e.g.* FAIR HOUSING IMPLEMENTATION COUNCIL, 2014 ANALYSIS OF IMPEDIMENTS FOR THE TWIN CITIES REGION (2014) [hereinafter 2014 Regional AI].

[3] 42 U.S.C. § 3608 (d), (e).

Below, each of the above concerns with the Draft AI is described in greater detail. **HUD**

FAIR HOUSING COMPLAINTS

In 2014 and 2015, two related HUD fair housing complaints were filed against Minnesota and a variety of Twin Cities governmental entities.[4] The first complaint, filed in late 2014, was brought by fair housing organization MICAH and the racially diverse Twin Cities suburbs of Brooklyn Center, Brooklyn Park, and Richfield. The respondents were the state of Minnesota, the Metropolitan Council, and the Minnesota Housing Finance Agency. The second complaint was filed in early 2015 by MICAH and several Twin Cities neighborhood organizations. The respondents were the cities of Minneapolis, Saint Paul, and the two cities' joint housing board, which is responsible for drafting the Qualified Allocation Plan (QAP) used by the cities to allocate housing tax credits. Taken together, the allegations of these two complaints form a critical piece of the historical record of housing segregation in the Twin Cities region.

Both complaints allege that the respondent entities had violated civil rights and fair housing law through a variety of practices, including the disproportionate concentration of Low-Income Housing Tax Credit (LIHTC) and other affordable housing subsidies in lower-income areas of the Twin Cities metropolitan area, which perpetuated and increased segregation.

As described in the complaints and the complaint process, concentration occurred through a variety of mechanisms. The cities and state operated competitive LIHTC allocation processes which awarded a high number of priority points to projects with characteristics that were commonly found in older, lower-income neighborhoods, such as projects that rehabilitated existing affordable housing or were located near high-speed transit hubs. In addition, other policy choices by the assorted respondent entities had a significant impact on the siting of housing, including the state's use of a so-called "suballocator" system.[5] This system designated certain municipalities – most notably the central cities of Minneapolis and Saint Paul – as tax credit "suballocators" which were permitted to set their own allocative schemes and received a LIHTC set-aside separate from the state's pool of tax credits. This, in effect, ensured that these jurisdictions were insulated from broader changes to the state's system for allocating tax credits. Moreover, these jurisdictions – which already contain a disproportionate share of the region's concentration of poverty and racially segregated neighborhoods – were assigned a set aside that was disproportionately larger than their share of population.

In addition to claims related directly to housing finance, the first complaint also alleged that the Metropolitan Council had abandoned historic policies that promoted integration and increased access to opportunity, including its practice of allocating "fair share" affordable housing goals to white-segregated suburbs, conditioning the receipt of various

[4] Additional information about both complaints, and the complaints themselves, are available on the MICAH website. MICAH, *MICAH Complaints to HUD*, https://www.micah.org/hud-complaint. [5] Minn. Stat. 462A.222 (2020).

agreements with other state agencies to advance these goals. Historically, these policies had helped steer a large amount of affordable housing construction in the Twin Cities towards higher-opportunity areas in suburban locales, reversing the concentrative patterns seen in most of the nation.[6] However, over time, enforcement of these policies was eroded and they were repealed by, at latest, 2015, when the Metropolitan Council adopted a new Housing Policy Plan that omitted them.[7]

The first complaint, against the Metropolitan Council, state housing agency, and state, appears to still be ongoing, albeit with few recent developments. As of 2016, after the failure of a conciliation process, it was being actively investigated by HUD, with frequent participation from all parties. However, there has been little apparent progress since the current presidential administration took power and subsequently slowed the pace of fair housing enforcement.

The second complaint, against the central cities, resolved in 2016 with the adoption of two Voluntary Compliance Agreements by the cities. The resolution of the complaints became interwoven with the previous Twin Cities Regional Analysis of Impediments. In 2014, the Fair Housing Implementation Council released the previous iteration of the regional AI. That document was clearly insufficient, omitting many required AI components, including any analysis of public policy's role in creating segregation, or indeed, any discussion of segregation whatsoever.[8] As a component of the Voluntary Compliance Agreements, Minneapolis and Saint Paul agreed to conduct a lengthy addendum process to strengthen the Regional AI, including participation from a variety of regional stakeholders in the form of a Fair Housing Advisory Committee, known as the FHAC. Respondents also agreed to incorporate analysis of certain critical questions into the AI addendum. Those topics are as follows:

a. The distribution of affordable housing throughout the Twin Cities metropolitan area;

b. the extent to which the recipients' administration of its low income housing tax credit allocations reinforces existing racial or ethnic concentrations of poverty or perpetuates racial or ethnic segregation;

c. the extent to which the administration of the recipients current zoning ordinances reinforces existing racial or ethnic concentrations of poverty or perpetuates racial or ethnic segregation;

[6] *See, e.g.*, Myron Orfield and Will Stancil, *Why Are the Twin Cities So Segregated?*, 43 MITCHELL HAMLINE L. REV. 1 (2017).

[7] METROPOLITAN COUNCIL, 2040 HOUSING POLICY PLAN (2014), *available at*

https://metrocouncil.org/housing/planning/housing-policy-plan.aspx. The exact date of repeal of the Metropolitan Council policies has been a subject of dispute, including in the HUD fair housing complaints. At times, the Council has claimed to have repealed the prior policies impliedly, by omission, as early as the mid-1990s, although it has not been able to provide a firm date on which that happened, or evidence of an explicit Council action towards that end.

[8] 2014 Regional AI.

d. the extent to which the recipients other housing related activities and policies affecting affordable housing reinforces existing racial or ethnic concentrations of poverty or perpetuates racial or ethnic segregation;

e. the appropriate balance of investment in place and in investment in new construction.[9]

The FHAC process concluded in 2017 with the publication of the required AI Addendum.[10] Although the revised AI did improve on some defects of the original AI, it only provided cursory discussion of the core topics required by the VCA, particularly the role of public policy and housing subsidies in perpetuating existing concentrations of poverty. However, in part due to the reduced emphasis on fair housing enforcement in the new presidential administration and HUD leadership, the Addendum was completed despite these deficiencies.

The current Draft AI skims over this lengthy HUD complaint process, which is still ongoing. The Addendum is mentioned at several points, but the complaint that led to its creation is only briefly described in passing as a dispute over whether Minneapolis and Saint Paul had "discriminated on the basis of race, color, and national origin in their administration of the Community Development Block Grant and HOME fund program."[11] The Draft AI does not discuss in any detail the nature of this claim, the evidence marshalled in support of it, which are critical to understanding recent increased in housing segregation in the Twin Cities region. Moreover, the Draft AI does not fully address the additional five topics, laid out above, that the VCAs incorporated into the AI Addendum. Although discussion of these five topics in the 2020 AI is not obligated by the VCAs, they remain as central to any analysis of fair housing impediments in 2020 as they were three years prior.

More significantly still, the Draft AI contains no discussion at all of the first HUD fair housing complaint, against the State of Minnesota, Metropolitan Council, and state housing agencies. Although these entities are not included on the Fair Housing Implementation Council, their policies guide and shape the development of the communities which are represented on the FHIC (and, in the case of the Metropolitan Council, are virtually coterminous with FHIC jurisdictions). Unquestionably, the allegations included in this first complaint are highly relevant to the existence of fair housing impediments in the Twin Cities region today. Even absent an ongoing complaint, statewide housing subsidy allocation, and the Metropolitan Council's regional land use policy, would be public policies with far-reaching implications for housing segregation in the Twin Cities, access to opportunity in the region, and housing mobility. The existence of the complaint increases the importance of addressing these policies, as it demonstrates

[9] Voluntary Compliance Agreement, MICAH, et al. v. City of Minneapolis, et al., Title VI Case Number: 05-15-0007-6; Section 109 Case Number: 05-15-0007-9 (May 16, 2016).

[10] FAIR HOUSING IMPLEMENTATION COUNCIL, ADDENDUM TO THE 2014 TWIN CITIES REGIONAL ANALYSIS OF IMPEDIMENTS (2017).

[11] Draft AI at 286.

a significant group of regional stakeholders – including major municipal governments – see these policies as a major obstacle to fair housing and metropolitan integration.

Recommendation: The Draft AI should include more robust discussion and analysis of the two HUD fair housing complaints described above, including the allegations at the core of those complaints and, in the case of the second complaint, discussion of the additional topics included in the 2017 AI Addendum.

DISPLACEMENT, GENTRIFICATION, AND POVERTY CONCENTRATION

Several portions of the Draft AI discuss the role of gentrification and displacement in reducing housing opportunity. The most comprehensive available research shows that displacement and gentrification, though a problem in limited parts of the region, are not overwhelming trends in the Twin Cities. However, the Draft AI omits that research entirely, and instead relies on other studies with limited scope and questionable methods. It is important that gentrification and displacement be correctly characterized, because the remedies to these problems can, if misapplied, result in increased disinvestment and poverty concentration.

Methodological Barriers to Identifying Gentrification

Unquestionably, many families in the Twin Cities region are displaced by high housing costs. However, cost-driven displacement is not synonymous with gentrification, a phenomenon that is more difficult to quantify and analyze.

The definition of gentrification is hotly contested in academic circles and popular discourse alike. Typically, gentrification is understood as being a process in which demand for development in a neighborhood suddenly spikes, leading to an influx of new residents and investment, which in turn compete for scarce housing with existing residents. As a result, gentrification is commonly identified with displacement. However, some scholars have argued that gentrification may be defined more broadly, and might occur in the absence of new displacement. At other times, scholars have argued for even less quantifiable forms of gentrification, such as "cultural gentrification," in which the character of a neighborhood changes in some intangible way. These latter definitions are of questionable relevance to policymakers: while it is indisputable that cities can evolve in innumerable ways, preventing cultural or physical changes to an area that do not have direct housing consequences seems to be largely outside the scope of housing policy.

The blurred definition of gentrification poses significant analytic difficulties. In particular, it limits the usefulness of relying on neighborhood self-reporting to identify gentrification, since virtually any change can be described as "gentrification" under some definition. Moreover, the unique character of gentrification – a problem of *too much* investment, despite investment being typically understand as a net positive for an area – lends itself to imprecision. Small improvements to the physical infrastructure of an area, such as upgraded shops, better-kept roads, new buildings, can be interpreted as alarming harbingers of gentrification and displacement. But in a modern city, only exceptionally

poor areas receive no upgrades whatsoever to physical or commercial infrastructure. In fact, it is not uncommon to hear residents worry that new subsidized housing units will induce gentrification, despite the unlikelihood that subsidized housing will attract the affluent residents who typically seek homes in high-demand areas. When almost any change can be seen as a sign of incipient gentrification, firsthand reports of gentrification become empirically unreliable.

Analysis of gentrification poses other difficulties, as well. While "displacement" describes a negative effect of housing cost pressure, "gentrification" describes a specific cause of cost pressure. Gentrification implies that cost pressure has increased because demand for housing and real estate in a neighborhood has increased *relative to surrounding areas*. But many other factors can lead to housing cost pressure on individual residents, such as declining or stagnant incomes, regional housing cost increases that are nonspecific to any neighborhood, or extortionate or predatory practices by landlords. Unfortunately, individuals are typically poorly situated to identify which of these factors (or others) is driving cost pressures they experience, since from the perspective of a resident, they all have the same key characteristic: housing costs being too high, relative to income. Because of this, while firsthand accounts of displacement pressures are reliable, attributions of those pressures to "gentrification" is best confirmed with neighborhood- and regional-level comparative analysis.

This is not merely an academic distinction. It is vitally important that gentrification be correctly identified, and not overcredited as a housing barrier, because the remedies to gentrification can, in non-gentrifying neighborhoods, cause greater harms. Some anti gentrification measures, like tenant protections, are relatively low-risk. But others are

best thought of like a dangerous antitoxin, that if administered to an individual who has not been poisoned, can itself function as a poison.

This is because the root cause of gentrification is increased investment, construction, and demand for housing in a neighborhood. But hundreds of historically segregated and low income neighborhoods in America suffer from disinvestment and low demand. In some cases, anti-gentrification measures involve steering away new investment and development, and barring new housing that would attract affluent residents. If anti gentrification measures are inappropriately applied to a neighborhood historically suffering from disinvestment, they risk increasing the depth of poverty in that area.

Flaws in the Draft AI Discussion of Gentrification

The Draft AI's treatment of gentrification does not directly address these concerns. Instead, it makes broad assertions that are not wholly supportable by the empirical research available. It omits the single most comprehensive study of regional gentrification, authored by this Institute, which attempts to quantify the scale and location

of the problem.[12] Importantly, that study, unlike other limited studies of Minneapolis and Saint Paul, is bidirectional: it seeks to establish which neighborhoods are still suffering from economic decline *as well as* which neighborhoods show evidence of demand-driven displacement consistent with gentrification. Finally, the Draft AI relies heavily on a study, created by the University of Minnesota Center of Urban and Regional Affairs, which is deeply flawed.[13]

The Draft AI states that "increasing and rapid gentrification of areas that were previously affordable has resulted in the loss of affordable housing throughout the Region, and particularly in Minneapolis, St. Paul, and the immediate suburbs."[14] However, it cites no empirical evidence for this claim. There is little evidence that neighborhood-specific gentrification has resulted in significant loss of affordable housing in either the central cities or its suburbs. The limited research that has been conducted on rising housing costs makes no attempt to connect rising housing costs with neighborhood-specific increases in housing demand.[15] In fact, housing costs appear to rising most slowly in low-income neighborhoods – in other words, to the extent that housing costs are too high, it appears to reflect *regional* increases, not a phenomenon specific to individual neighborhoods.[16]

The Draft AI discusses a lengthy report on gentrification conducted by the Center for Urban and Regional Affairs (CURA) at the University of Minnesota.[17] However, this report has major methodological flaws. First, it theorizes that gentrification can take many forms, including forms in which poverty *increases* in a particular neighborhood.[18] While the definition of gentrification is nebulous, as discussed above, it is hard to conceive of gentrification being a primary concern in an area that is getting noticeably poorer.

[12] INSTITUTE ON METROPOLITAN OPPORTUNITY, AMERICAN NEIGHBORHOOD CHANGE IN THE 21ST CENTURY: GENTRIFICATION AND DECLINE (2019), https://www.law.umn.edu/institute-metropolitan opportunity/gentrification.

[13] CENTER FOR URBAN AND REGIONAL AFFAIRS, THE DIVERSITY OF GENTRIFICATION: MULTIPLE FORMS OF GENTRIFICATION IN MINNEAPOLIS AND ST. PAUL (2019),

http://gentrification.dl.umn.edu/sites/gentrification.dl.umn.edu/files/media/diversity-of-gentrification 012519.pdf.

[14] Draft AI at 292.

[15] Note that the claim that gentrification is causing rising housing costs is separate from the claim that housing costs are rising. It is this nexus between cause and effect that undermines most purported studies of gentrification that focus on housing costs. These studies often make no attempt to determine whether demand for development or housing has increased in a given area.

[16] *See, e.g.*, INSTITUTE ON METROPOLITAN OPPORTUNITY, ARE MINNEAPOLIS AND SAINT PAUL GENTRIFYING? (2016), https://www.law.umn.edu/sites/law.umn.edu/files/metro-files//are-minneapolis-and stpaul-gentrifying-jan2016.pdf.

[17] CENTER FOR URBAN AND REGIONAL AFFAIRS, THE DIVERSITY OF GENTRIFICATION: MULTIPLE FORMS OF GENTRIFICATION IN MINNEAPOLIS AND ST. PAUL (2019),

http://gentrification.dl.umn.edu/sites/gentrification.dl.umn.edu/files/media/diversity-of-gentrification 012519.pdf.

[18] *Id.* at 2.

In addition, the CURA study relies heavily on interviews obtained through non-random "snowball sampling."[19] Its sample of interviews contains very few neighborhood residents, including a total of 12 renters and 23 homeowners, divided between five different large neighborhoods.[20] In other words, "gentrification" causing rental cost increases is described in a neighborhood based the reports of fewer than 3 renters. The snowball sampling method also results in a disproportionate number of interviews with non-resident neighborhood stakeholders, such as affordable housing developers, who have a clear economic interest in describing an area as vulnerable to gentrification.

Most damning of all, the CURA report make virtually no attempt to distinguish between cost pressures caused by increasing poverty and displacement caused by increasing demand. Without making that distinction, its findings are virtually useless in housing policy, because the remedies to these two different problems are often diametrically opposed. For instance, the report maps census tracts in Minneapolis in which the median rental and homeowner units are affordable to the median renter household, broken down by different racial groups.[21] These maps show dramatic reductions in the number of affordable neighborhoods between 2000 and 2016. However, the report fails to note a critical fact about these same maps: the accompanying figures show that median rent and median housing costs remained relatively stagnant over the same period, while median income declined significantly (for instance, by nearly 10,000 inflation-adjusted dollars for black renters). This data strongly implies that reductions in affordability were the product of increases in poverty, not gentrification. However, this obvious conclusion is hidden by the report, because it undermines the idea that gentrification is an endemic problem in the Twin Cities. In short, the CURA report is unreliable analysis containing data that contradicts or undermines some of its own chief conclusions. Standing alone, it is not suitable for identifying major regional trends.

Omitted Scholarly Analysis

The CURA report's flaws are highlighted by the fact that its depiction of a heavily gentrifying region is contradicted by most other scholarly treatment of this subject.

First, the National Community Reinvestment Coalition conducted a nationwide study of gentrification. Although it only provides summary analysis of Minneapolis, this study found that only 22 of 771 Twin Cities census tracts had gentrified – a total of 2.9%.[22]

In addition, the Institute on Metropolitan Opportunity has published two much more detailed reports on the gentrification and displacement in the Twin Cities, both of which adopt a more consistent methodology than the CURA study, and rely less on anecdotal self-reporting. Both find that gentrification is a relatively rare phenomenon in the region,

[19] *Id.* at 20.

[20] *Id.*

[21] *Id.* at 11-12.

[22] NATIONAL COMMUNITY REINVESTMENT COALITION, SHIFTING NEIGHBORHOODS: GENTRIFICATION AND CULTURAL DISPLACEMENT IN AMERICAN CITIES (2019), https://ncrc.org/gentrification/.

and the latter finds, consistent with the NCRC report, that the region has relatively little gentrification compared to wealthier American cities.

The first of these Institute studies, *Are Minneapolis and Saint Paul Gentrifying?*, analyzes changes in neighborhood demographics and housing cost factors across all major Minneapolis and Saint Paul neighborhoods between 2000 and 2016.[23] It finds very few changes consistent with gentrification in lower-income neighborhoods: virtually all such neighborhoods saw an increase in poverty, a decrease in white population share, and stagnant or decreasing relative housing and rental costs. However, like the CURA study, this study made no effort to analyze changes in suburban locales.

The second Institute study, *American Neighborhood Change in the 21st Century*, is dramatically broader in scope.[24] This study, which is nationwide but includes a subreport on the Twin Cities, is the single most comprehensive look at neighborhood change in the United States in at least the previous decade. It is distinguished from every other major study in at least three ways. First, it is multidirectional, looking at neighborhood economic growth *and* decline, in order to determine the relative location and scale of the two problems. Second, it uses population change to estimate changes in demand for a neighborhood, rather than attempting to measure demand through housing prices, which can be affected by a variety of other factors. Third, it incorporates suburban as well as urban areas. The study classifies every census tract in America by the type of change that is occurring in the tract, which can include overall population growth, population growth with low-income displacement (corresponding with gentrification), population decline with low-income concentration (corresponding with poverty concentration), and overall decline. This methodology allows for clear distinctions between gentrifying and non gentrifying neighborhoods, and allows for rough estimates of the scale of the problem in a given region.

The second Institute report finds that the Twin Cities are suffering from low-to-moderate degrees of gentrification and displacement.[25] On net, approximately 1,100 low-income residents were prospectively displaced from gentrifying areas in the central cities between 2000 and 2016, while about 500 low-income residents were prospectively displaced from suburban areas. However, by comparison, about 30,300 low-income residents were concentrated into economically declining central city neighborhoods, and 86,700 low-income residents were concentrated into economically declining suburban neighborhoods. The population subgroup most likely to live in a gentrifying or economically expanding neighborhood was black residents, of whom about 4% live in

[23] INSTITUTE ON METROPOLITAN OPPORTUNITY, ARE MINNEAPOLIS AND SAINT PAUL GENTRIFYING? (2016), https://www.law.umn.edu/sites/law.umn.edu/files/metro-files//are-minneapolis-and-stpaul-gentrifying jan2016.pdf.

[24] INSTITUTE ON METROPOLITAN OPPORTUNITY, AMERICAN NEIGHBORHOOD CHANGE IN THE 21ST CENTURY: GENTRIFICATION AND DECLINE (2019), https://www.law.umn.edu/institute-metropolitan opportunity/gentrification.

[25] The Twin Cities regional report can be accessed at

https://www.law.umn.edu/sites/law.umn.edu/files/metro-files/minneapolis_incomechange_report.pdf.

such an area. But black residents were also the group most likely to live in an economically declining area. About 42% of regional black residents lived in a declining neighborhood.

About 9% of Minneapolis residents live in an area that experienced gentrification and economic expansion between 2000 and 2016, the highest share of any municipality in the region. However, even in Minneapolis, an even larger share – 23% of total population – lived in an area experiencing economic decline. By comparison, only a tiny share – less than 2% – of residents of Saint Paul and the region's suburbs live in a neighborhood that is prospectively gentrifying.

Mapping these trends reveals that they are geographically limited. The bulk of Twin Cities displacement is occurring in a handful of neighborhoods immediately adjacent to downtown Minneapolis. Meanwhile, traditionally low-income neighborhoods, particularly North Minneapolis, downtown Saint Paul, and the areas east and west of downtown Saint Paul, are sites of heavy poverty concentration and even overall neighborhood population decline.

Perhaps most importantly of all, there is an extremely rapid increase in poverty concentration in the region's inner suburbs. The suburbs to the north of Saint Paul, such as Maplewood, Little Canada, and North Saint Paul; south of Minneapolis, such as Richfield, Bloomington, and Burnsville; and especially to the northwest of Minneapolis, including Brooklyn Park and Brooklyn Center, are sites of rapidly increasing poverty concentration and racial segregation.

Recommendation: The final version of the 2020 AI should include the full set of research and analysis related to gentrification in the Twin Cities region. It should also identify the limitations of existing research, so that policymakers do not overdraw the conclusions of particular pieces of research – for instance, by assuming that research that is geographically restricted to the central cities is applicable in the more-populous suburban portions of the region.

POLICY RECOMMENDATIONS

The broad policy goals laid out in the Draft AI are commendable.

In particular, the following goals represent a vindication of original core purposes of the Analysis of Impediments process, and the Fair Housing Act, that have been frequently ignored by Twin Cities policymakers:

- Goal 1: Increase the supply of affordable housing in high opportunity areas. • Goal 7: Expand access to opportunity for protected classes.
- Goal 8: Reduce barriers to mobility.

Unfortunately, the underlying policy strategies intended to promote these goals are

imperfect. Several lack the specificity to accomplish the stated goal. Others need to be

targeted to particular geographic areas in order to be most effective. Fine-tuning these strategies will make the Draft AI a much more effective policy document.

In addition, care should be taken to specify which goals apply to which jurisdictions (as was the case in the 2017 AI Addendum). Otherwise, some goals, particularly those seeking to prevent gentrification and preserve housing affordability, may be misapplied in ways that risk creating or worsening current residential divides.

Strategy-specific recommendations follow below.

Goal 1: Increase the supply of affordable housing in high opportunity areas

In general, the strategies listed under this goal are positive in effect, but unlikely to specifically increase the supply of housing in high-opportunity areas. They should be revised to more carefully target these geographic areas, particularly those areas with high educational and economic opportunity. Specific recommendations follow:

- ***"Change existing land use and zoning laws, where possible, to allow for Accessory Dwelling Units (ADUs) and tiny homes."*** While land use laws should be altered to provide for greater housing density and construction in areas of high opportunity, limiting these changes to ADUs and "tiny homes" will have a limited impact. The most efficient way to add new units to these areas is in multifamily developments. Multifamily developments in high-demand, high-amenity areas are also more economically viable than individual ADUs or smaller-than-average "tiny homes," meaning that the private market is more likely take advantage of land use and zoning changes to produce more housing. **Recommendation:** Expand strategy to allow for multifamily housing development in high opportunity neighborhoods and jurisdictions.
- ***"Provide additional investments in the Affordable Housing Trust Funds in St. Paul and Minneapolis and additional investments in affordable housing in the other jurisdictions."*** Merely increasing the amount of affordable housing in a given jurisdiction does not increase the supply of housing in high-opportunity areas. In some scenarios, increasing affordable housing may *increase* the overall amount of segregation, if the housing is sited in low-income or racially segregated areas. Thus, additional investments must be restricted to high-opportunity areas. **Recommendation:** Require additional investments to be utilized in high opportunity areas with significant educational and economic amenities.
- ***"Provide funding to assist community organizations in purchasing, rehabilitating, and leasing dilapidated rental properties. Ensure that these organizations have the right of first refusal to purchase prior to outside, for profit developers."*** This strategy does nothing to increase the supply of affordable housing in high-opportunity areas. Dilapidated rental properties are very rare in high-opportunity areas due to the existing

high housing demand in those areas. Instead, dilapidated rental properties are much more likely to be located in low income, segregated areas. Funding affordable housing creation in those areas will

perpetuate or intensify segregation. Moreover, a preference for nonprofit developers risks backfiring. Nonprofit developers tend to be based in low-income, segregated areas, and thus such a preference could further steer investment towards low-opportunity neighborhoods. This strategy requires funding that could be better purposed towards truly integrative development. **Recommendation:** Eliminate this strategy.

- ***"Condition the distribution of grant funds to jurisdictions by the Metropolitan Council based communities providing concrete plans to meet their fair share of the decennial affordable housing needs."*** This is an excellent strategy that echoes successful fair-share housing practices by the Metropolitan Council in the past. However, its success depends on the amount and type of funding that is conditioned on housing performance. In the past, housing performance was considered in the award of parks, sewer, and transit funding. In addition, the Council formed a collaborative agreement with the state housing agency to ensure that the agency's housing funds – which substantially exceed those awarded directly by the Council – were distributed in compliance with Council plans. The Council has been statutorily granted the power to review plans of independent state agencies if those plans have areawide effect. **Recommendation:** This strategy should be retained and expanded. The strategy should specify that all funding sources are conditioned on housing performance, and the Council should use its statutory powers to condition state housing agency funds on housing performance as well.
- ***"Expand bonus point offerings in RFPs to incentivize the development of large units with three or more bedrooms."*** While this strategy is beneficial, it does not directly increase the supply of affordable housing in high-opportunity areas. **Recommendation:** The strategy should specify that there should be bonus point offerings in high-opportunity areas.

Goal 7: Expand access to opportunity for protected classes

Each of the recommended strategies offered under this goal is positive. However, the goal would benefit from an expanded scope. In particular, in addition to adopting policies to improve economic opportunity, such as improving transit and increasing the minimum wage, jurisdictions should consider methods of improving access to educational opportunity.

At present, there is a high degree of segregation in Twin Cities schools.[26] Educational segregation is closely connected to both housing segregation and lack of access to

[26] *See, e.g.*, Brief of Myron Orfield as Amicus Curiae Supporting Petitioners, Cruz-Guzman v. Minnesota, No.

educational opportunity.[27] The State of Minnesota is currently facing a statewide school desegregation lawsuit and considering various remedies.[28]

There are a variety of policies that could be adopted by municipalities and state agencies that would reduce segregation and increase educational opportunity. Minnesota maintains a statewide school integration rule; this rule should be redrafted to require schools to eliminate demographic concentrations or reflect the demographic or economic composition of the surrounding region.[29] Segregated school districts should be required to work collaboratively with neighboring districts to ensure integrated educational facilities. Schools that intentionally concentrate protected classes of students should be denied state funding.

Addressing educational demographic patterns will likely reduce barriers to fair housing choice.[30] Many neighborhoods and municipalities are expensive to access because of the perceived quality of their schools, while other areas have underperforming housing markets because of the perceived weakness of their schools. A comprehensive regional school integration policy would be a significant advancement in housing civil rights.

Recommendation: Strategies for promoting educational opportunity should be incorporated into the recommendations, particularly desegregation and integration. This includes adoption of a regional integration policy mandating inter-district coordination to eliminate concentrations within schools, and a ban on state funding to schools that intentionally maintain segregated student bodies.

Goal 8: Reduce barriers to mobility.

Each of the strategies in this section is positive. However, there is room for greater improvement. The metropolitan area contains 10 separate public housing authorities (PHAs), which results in a large amount of redundant – and occasionally contradictory – policymaking. The most obvious area for bureaucratic difficulties is, of course, porting vouchers between different PHAs. But there are other areas where differing policies between PHAs are likely to cause confusion for residents, waste resources, and frustrate overarching policy objections.

The obvious solution for this problem is to collapse the entire metropolitan PHA system into a single metrowide housing authority, likely operating under the Metropolitan Council. Although this proposal would invariably receive significant pushback from the employees of the existing PHAs, there are essentially no arguments whatsoever for the

[27] *See, e.g.*, National Coalition on School Diversity, *Research Brief: School Integration and K-12 Outcomes: An Updated Quick Synthesis of the Social Science Evidence* (Oct. 2016), https://school diversity.org/pdf/DiversityResearchBriefNo5Oct2016Big.pdf.

[28] ACLU Minnesota, *Cruz-Guzman v. State of Minnesota*, https://www.aclu-mn.org/en/cases/cruz-guzman v-state-minnesota.

[29] Minn. R. 3535 (2020).

[30] *See, e.g.*, National Coalition on School Diversity, *Research Brief: The Reciprocal Relationship Between Housing and School Integration* (Sept. 2011), https://www.school

diversity.org/pdf/DiversityResearchBriefNo7.pdf.

existing system. The Draft AI should recommend this change, even if institutional inertia makes it unlikely in the near future. The recommendation alone broaches the subject and may help drive longer-term changes towards PHA centralization.

In addition, there are other ways for the PHAs to work together collaboratively. The Minneapolis PHA is a "Moving to Work" jurisdiction, which allows it considerable additional flexibility under HUD PHA rules.[31] It has used this flexibility to explore novel housing mobility programs, such as programs to provide counseling and assistance necessary to house PHA residents in high opportunity areas. In addition, the agency has taken advantage of a little-noticed provision in the Moving to Work legislation and sought permission from HUD to operate as a "regional" Moving to Work program, which allows it to partner with other PHAs and provide them with similar flexibility. MPHA has explored using this regional program to set up region-wide voucher-based mobility programs, among other innovations. Although it has offered this opportunity to all regional PHAs, at present, only the Metro PHA has joined the regional collaborative.[32]

Encouraging additional PHAs to join this regional collaborative would provide many of the benefits of a unified regional housing authority, without requiring the elimination of the agencies themselves, and should be encouraged as an intermediate step towards centralization.

Recommendations: Add a strategy encouraging the consolidation of regional PHAs. Add a strategy recommendation that regional PHAs join the MPHA Moving to Work regional collaborative.

Avoiding Contradictory Strategy Recommendations

In addition to the suggestions above, several recommendations risk contradicting the stated goals of the Draft AI. In particular, any recommendation that tends to preserve affordable housing, site affordable housing in low-income areas, or could be used to block investment or development in low-income areas, risks perpetuating existing segregative living patterns. As such, any such strategies should be carefully targeted (i.e., at particular neighborhoods, jurisdictions, or situations) in order to avoid these inadvertent negative effects.

Several of the proposed strategies in the Draft AI appear to run this risk.

- ***Goal 2: "Provide restrictions on the "flipping" of affordable rental housing by outside investors. Require that 1) a large percentage of units remain affordable at deeper levels of affordability; 2) previous tenants have rights of return; and 3) displaced tenants have access to relocation services."*** This strategy, in some limited instances, may have the unintended effect of suppressing development and

[31] *See, e.g.*, Minneapolis Public Housing Authority, *Minneapolis and Met Council to Form Nation's First Regional Moving to Work Agency* (Jan. 28, 2020), https://mphaonline.org/mpha-and-met-council-to-form nations-first-regional-moving-to-work-agency/.

[32] *Id.*

investment in low-income areas. In particular, the first part of the strategy, requiring that a "large percentage" of units remain at "deeper levels of affordability," risks dramatically increasing the cost of even minor redevelopment of affordable rental units. **Recommendation:** The first part of this strategy should be conditioned on the overall affordability of the surrounding neighborhood. Developers should be required to preserve more affordability in areas with smaller amounts of nearby affordable housing.

- ***Goal 3: "Develop partnership with local lending institutions to conduct homebuyer and financial literacy education targeted at communities of color."*** Academic research has suggested that financial literacy education has little to no positive effect over the medium-term.[33] **Recommendation**: Eliminate this strategy.

- ***Goal 4: "Establish a policy for regular community participation in advance of approving new development in areas populated by low- and moderate-income Black and Brown residents. To ensure maximum participation, these meetings should be held at a variety of times be accessible via public transportation, be in locations that are ADA accessible, and provide food and perhaps childcare, if the meeting occurs in the evening."*** Community participation can be a double edged sword. As the problem of NIMBYism has demonstrated, participative processes have a tendency to empower small, vocal minorities who want to resist change, while excluding larger majorities who are agnostic about new development. This dynamic does not appear to be restricted to high-income areas. As a result, expanding community participation in private development risks placing significant roadblocks in front of new investment. **Recommendation:** Eliminate the first sentence of this strategy. Community participation processes should be conducted identically in all neighborhoods, but with additional measures to facilitate participation from all demographic groups and socioeconomic strata, such as childcare.

[33] *See, e.g.*, Daniel Fernandes, John G. Lynch, Richard G. Netemeyer, *Financial Literacy, Financial Education, and Downstream Financial Behaviors*, 60 MANAGEMENT SCIENCE 1861 (2014); Lauren E. Willis, *Against Financial Literacy Education*, 94 IOWA L. REV. 197 (2008).

SAINT PAUL CENTRAL OFFICE

55 East Fifth Street, Suite 400

Saint Paul, MN 55101

Phone: (651) 222-5863 ● Fax: (651) 297-6457 Website: www.smrls.org ● Email: central@smrls.org

October 17, 2020

Kristin Burch

City of St. Paul Office of Financial Empowerment

15 West Kellogg Blvd.

St. Paul, MN 55102

Re: Comments to the Analysis of Impediments

Dear Ms. Burch:

I have reviewed the draft 2020 Analysis of Impediments to Fair Housing Choice. I am writing to make you aware and request the inclusion of a subsequent development to impediments to fair housing.

Earlier this year the Minnesota Supreme Court issued an opinion *In the Matter of Cindi Ali*, 938 N.W. 2d 835 (Minn. 2020), that impacts integrated housing for people with disabilities. The case concerned the inclusion of community support in family income for purposes of calculating eligibility for the Section 8 housing choice voucher program. Ms. Ali is a single mother of four children. Her son suffers from a severe form of autism and development disabilities. He qualifies for the Consumer Directed Community Support (CDCS) program administered by the Minnesota Department of Human Services (DHS) and receives a Development Disability waiver. The CDCS program consists of an annual budget allocated to the family to ensure that the developmentally disabled family member can remain in the home rather than being forced into institutionalization.

For the Housing Choice Voucher program, the federal regulations exclude certain forms of assistance from income. Under 24 C.F.R. section 5.609(c)(16), amounts paid by a state agency (here, the State of Minnesota) to a family with a member who has a developmental disability and is living at home are excluded if the amounts are "to offset the cost of services and equipment needed to keep the developmentally disabled family member at home." Despite this being a commonly excluded income source by housing authorities throughout Minnesota,

the court held that this assistance should be included in income. Because of the court's interpretation Ms. Ali's family was found ineligible for voucher assistance. She was not able to utilize her housing subsidy and her family's housing choice was diminished.

In August of this year the California Supreme Court issued an opinion interpreting the same regulation but resulting the opposite conclusion. In *Reilly v. Marin Housing Authority*,10 Cal. 5th 583 (2020), the court held that the IHSS program (California's version of CDCS) was excluded from income for purposes of Section 8 voucher eligibility. Citing the IHSS program guidance the court found the purpose of the legislation is to give the aged, blind and disabled the "assistance

and services which will encourage them to make greater efforts to achieve self-care and self maintenance, whenever feasible, and to enlarge their opportunities for independence." IHSS, like CDCS, is specifically "designed to avoid institutionalization of incapacitated persons."

The *Reilly* court disagreed with the Minnesota Supreme Court's definition of cost and offset. The California court also pointed out that "the Minnesota program — which allowed the mother to 'allocate her budget as she saw fit to keep her son living at home' — is structured differently from the IHSS program in a way that makes *Ali* distinguishable."

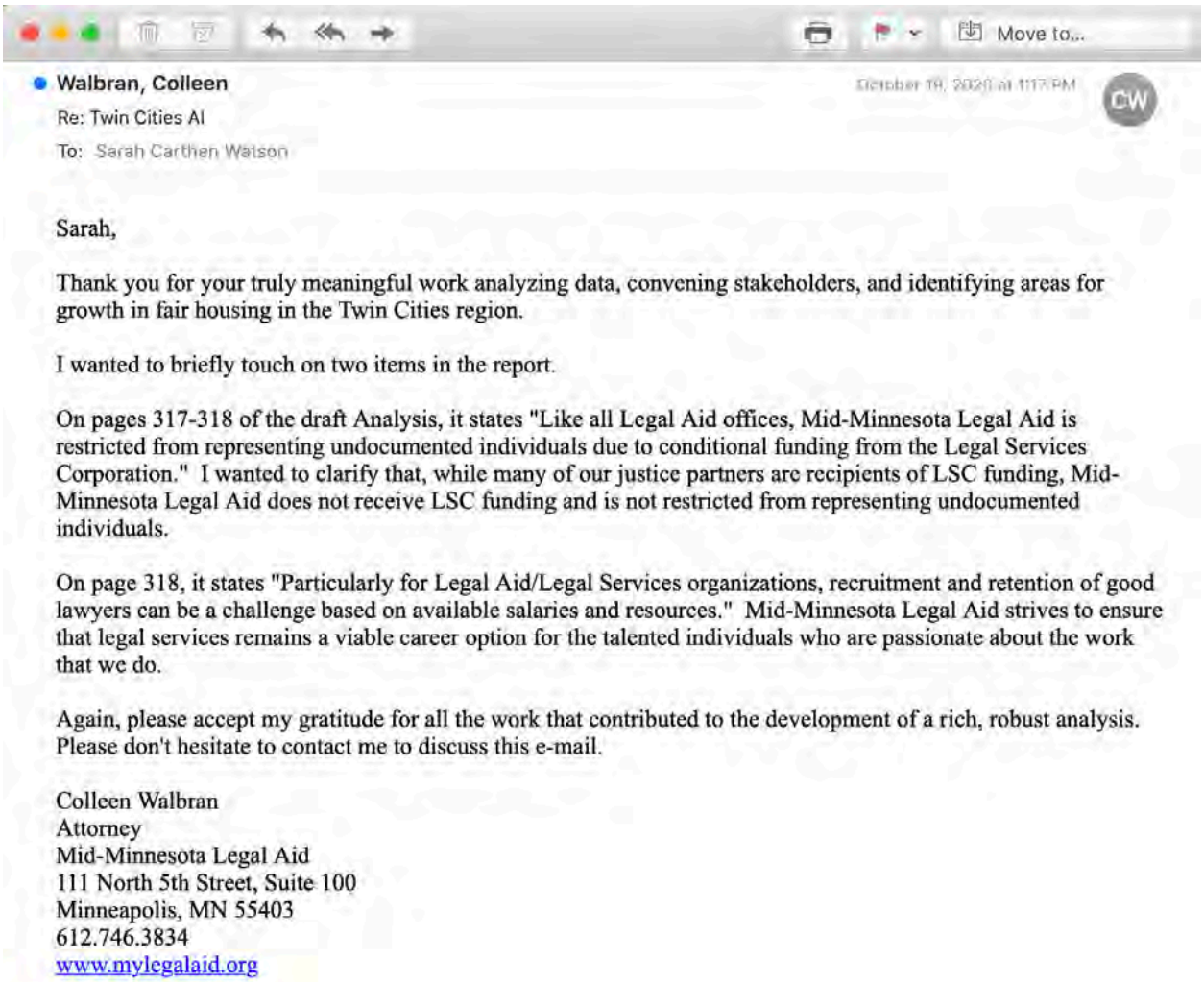
This means that similarly situated families in California have more housing options. One way to address this impediment would be for DHS to make the CDCS program structured more like the California IHSS program. For instance, DHS could revise the program rules to mirror the California rules which state the program may compensate the parent who provides in-home care to her disabled child. This would change from a budget allocation to compensation which the regulation more clearly excludes.

Clear guidance from Minnesota DHS about the structure of the program and a change in the definition of CDCS regarding allocation of budget could change the inclusion and open up housing opportunity for families with developmentally disabled children. It would both increase housing choice and promote integrated housing for people with disabilities.

Thank you for the opportunity to explain this recent development that restricts housing choice and is an impediment to fair housing.

Sincerely,

Laura Jelinek



Move to...

Walbran, Colleen

October 19, 2020 at 1:17 PM

Re: Twin Cities AI

To: Sarah Carthen Watson

CW

Sarah,

Thank you for your truly meaningful work analyzing data, convening stakeholders, and identifying areas for growth in fair housing in the Twin Cities region.

I wanted to briefly touch on two items in the report.

On pages 317-318 of the draft Analysis, it states "Like all Legal Aid offices, Mid-Minnesota Legal Aid is restricted from representing undocumented individuals due to conditional funding from the Legal Services Corporation." I wanted to clarify that, while many of our justice partners are recipients of LSC funding, Mid-Minnesota Legal Aid does not receive LSC funding and is not restricted from representing undocumented individuals.

On page 318, it states "Particularly for Legal Aid/Legal Services organizations, recruitment and retention of good lawyers can be a challenge based on available salaries and resources." Mid-Minnesota Legal Aid strives to ensure that legal services remains a viable career option for the talented individuals who are passionate about the work that we do.

Again, please accept my gratitude for all the work that contributed to the development of a rich, robust analysis. Please don't hesitate to contact me to discuss this e-mail.

Colleen Walbran
Attorney
Mid-Minnesota Legal Aid
111 North 5th Street, Suite 100
Minneapolis, MN 55403
612.746.3834
www.mylegalaid.org

General comment: I find few recommendations that I would disagree with but also think that some will have only minor benefit or require much greater spending than is likely. Therefore it would be helpful if the Analysis provided more insight in the form of cost/benefit analysis and ease of implementation for the jurisdictions.

Recommendation (Goal 3):

Provide more opportunities for families on public assistance to transition to ownership.

Comment: The low level of public assistance given to families and the high price of housing dooms this proposal except in exceptional circumstances. The subsidy must be in the hundreds of thousands of dollars, thus reducing money available to many, many other families. Sometimes the ownership cost can be reduced via a land trust but it still requires a very large subsidy. Having worked to increase homeownership in communities of color and then experienced the wave of client losses of homes after the mortgage fraud and resulting crisis, I am convinced that the cost of programs for 1st time low-income homeowners is just too high and that money is better spent in rental support or in preserving ownership for homeowners facing relatively small financial challenges..

Recommendation (Goal 6):

Require that all rental and homeownership applications be made available in Spanish, Hmong, and Somali, and ensure that paper copies are available for those without computer access.

Comment: Do you have any idea how many people can read and write in Hmong and Somali better than they read and write English? It is my impression that the % is likely to be very small. Which dialects? If there are relatively few, the utility for other than Spanish-speakers is minor and the cost of accurate translations is going to be quite high. Landlords will object that this is a costly step that raises the cost of housing and deleting it would be a gesture to their concerns.

Recommendation: Various Tenant Protection Proposals (Goal 6)

Comment: There are a number of changes made recently in Minneapolis and St Paul ordinances that align with the proposals in this document, for example, limits on use of criminal background checks and credit scores in tenant screening, caps on the amount of security deposits, etc. Not yet in effect in St. Paul, the Minneapolis ordinance is being challenged in federal court by landlords claiming constitutional violations. Other governments in the Region should back the City of Minneapolis as *amici* and enact their own versions of tenant protections.

Recommendation: Enact Source of Income Protection (Goal 6)

This should be a high priority recommendation as it does not require spending public money. Minneapolis has recently established a degree of protection for section 8 voucher subsidy users. The Minnesota Supreme Court has affirmed the City's power to do so. Having such protections only in Minneapolis will have the effect of further concentrating voucher users there while doing nothing to address such discrimination in other communities. Other cities, or preferably, the State, should enact such protections.

Recommendation: Various Tenant Protection Proposals (Goal 6)

Missing from these recommendations is elimination of, or restrictions on, the common requirement that rental applicants show that they have income three times the rent in order to qualify for renting a home. This was a part of the prior AI recommendation and has been the subject or ordinance changes in Minneapolis and St. Paul. (Minneapolis landlords are challenging the constitutionality of this in the suit mentioned above.) I include here a paper defending the Minneapolis provision, which merely requires landlords using minimum income screening to give applicants a chance to show that, like half of all renters in the City, that they have successfully budgeted for rent. While the data is Minneapolis-focused the

analysis would likely be applicable to other jurisdictions.

Minneapolis's Controls on Tenant Screening Practices Advance Equal Housing for Residents.

Minneapolis adopted the tenant protection ordinances after years of studies, reports and analyses that identified rental practices as impediments to fair housing and burdens on its most vulnerable residents. While there continues to be disputes as to the minimum standards for compliance with the duty to affirmatively further fair housing, it is certain that the ordinance's effort to ameliorate the racially disparate impact of the housing practices in both public and private sectors comports with its local and federally mandated obligation to ensure fair housing for its residents.

With respect to justifications for limiting rent:income tenant screening, termed a minimum income test, Minneapolis Ordinance 244.2030 (c)(3)(c), it is important to examine the 2014 Analysis of Impediments to Fair Housing and an Addendum in 2017 that were submitted to the U.S. Department of Housing and Urban Development by the City. This Analysis is required in order to comply with the Fair Housing Act, as amended, 42 U.S.C. Section 3608, and its implementing regulations and policies. These submissions addressed a number of barriers, including the use of a minimum income test.

These reports specify information on families who were actually living in homes with rent expenses of between just under one-third (30%) to more than one-half (50%) of family income. More than 50% of all Minneapolis renters paid more than 30% of income towards rent. Close to 28% paid fully half of their income for rent. Addendum Table 3-13. [225] In other words, half of all Minneapolis renters would fail a 3:1 income test in their current homes.

225 https://www.ramseycounty.us/sites/default/files/Projects%20and%20Initiatives/Draft%20III%20Addendum.pdf.

This was aggravated in areas of poverty with more than 50% people of color in the City; in those neighborhoods, 52% paid at least 30% and 33% of these families paid more than half their income for rent. Table 3-13. The protections of the ordinance are most important in those vulnerable parts of the City where poor people of color are concentrated.

When rent burdens are examined according to the race or ethnicity of the families, the figures become more stark. The population of Minneapolis residents affected by housing problems (primarily cost or overcrowding) was very stratified by race and ethnicity. Among white, non-Latino families just 16.5% experienced housing problems as compared to 35.8% of Black non-Latino families, 29% of Asian, non-Latino families, 33.4% of American Indian, non-Latino families and 41.5% Latino families. Table 3-15.

The studies did not analyse how female-headed households fared with respect to the income/rent ratios, as women's earnings remain significantly lower than men's (85.5%), there is little doubt that such policies hurt women and their children. [226] While we cannot find an analysis of housing expense and disability status, giving disabled people a chance to show their budgeting capacity also advances their opportunity to fairly choose their homes.

During this city-sponsored Analysis of Impediments to Fair Housing, residents, housing providers, and housing experts throughout the Twin Cities were asked to identify practices that interfered with fair housing choice and increased housing burdens on members of protected classes. [227]

During the public engagement process, the income test barrier (along with credit history, criminal history and eviction records) was raised again and again. Income screening was mentioned at least 20 times. For example:

[226] https://www.bls.gov/regions/midwest/news-release/womensearnings_minnesota.htm

[227] https://www.ramseycounty.us/sites/default/files/Departments/2014%20FHIC%20AI%20-%20FINAL.pdf.

> So many people in this country are homeless because they are disabled and only have $720/mo. in income - they are automatically denied most market rate housing (even if they can budget for the rent) due to their income.
>
> Landlords/Owners expect and demand 3 times your income from people with fixed incomes, and deny you housing based on poor credit even though you may have exceptional rental history.

See Sections 10 and 11, pp. 109-143.

Consequently the 2014 AI did identify as an impediment:

> High rental application denial rate in communities of color and those with disabilities based on rental selection criteria (criminal background, credit history, rental background). p. 101.

In the following Addendum[228] from 2017 the same problems were summarised:

> In addition to source of income discrimination, community members identified rental application processes and tenant selection criteria as a barrier. Credit histories and income requirements were the most frequent issues cited but criminal histories and evictions/unlawful detainers were also mentioned. p. 216

The Metropolitan Council's recent *Choice, Place and Opportunity: An Equity Assessment of the Twin Cities Region*[229] Section 4, p. 28 also noted:

[228] https://www.ramseycounty.us/sites/default/files/Projects%20and%20Initiatives/Draft%20III%20Addendum.pdf

[229] https://metrocouncil.org/Planning/Projects/Thrive-2040/Choice-Place-and-Opportunity/FHEA/CPO-Sect-4.aspx

> In addition, rental practices shown to have disparate impact—such as tenant screening procedures—are more likely to exacerbate historic and emerging barriers to housing choice in tight rental markets.

Consequently, Minneapolis's adoption of a requirement that landlords give consideration to applicants' history of successful rent payments if they choose to use the income test is not only reasonable but also a tool wielded to address the critical problem of housing discrimination.

MINIMUM INCOME RULES OF THUMB DO NOT SERVE LEGITIMATE PURPOSES

As demonstrated above, the 3:1 rule of thumb does not reflect the reality of successful renting in a city, Minneapolis, with about 92,000 rental households[230] where more than 26,000 families are paying 50% of their income for rent month in and month out (see above). These families are intimately more familiar with their budgets than are landlords.

What is the source of the common practice of using a minimum income test? Obviously a tenant family must have enough income to pay rent and cover other necessities of life. But where does the 3:1 ratio come from? It is relatively common and loudly defended by some. One would assume that in data-driven times, there would be data driven justification for the ratio. But it is wholly devoid of such analysis in the real world of rental housing markets.

Defenders of the test will point to use of rules of thumb in the mortgage market (though of course mortgage qualifications are much more detailed and documented than this 3:1 test). They misapprehend the fundamental nature of the transactions. A lender is giving hundreds of thousands of dollars to the borrower and depending

[230] https://www.census.gov/quickfacts/fact/table/minneapoliscityminnesota/HSG010219#HSG010219.

on thirty years of consistent mortgage payments to be successful. The lender's risk of default is not mitigated by even one month of a "security deposit" and it must take expensive legal actions that may last six months, a year or longer before it can retrieve its collateral. A rental owner is giving use of an apartment for one month, with an average cost of $1240 in 2015 in Minneapolis, and typically retains a deposit of $1240. The time it takes for an eviction is comparatively fast: the majority of the cases are done in 14 days and 90% are closed within 30 days. [231]

J. David Hulchanski, is the Dr. Chow Yei Ching endowed chair in housing at the University of Toronto's Faculty of Social Work and is cross-appointed with the graduate program in urban planning. He teaches graduate courses and supervises dissertation research in housing policy, comparative international housing systems, human rights and social justice. His teaching and research focus on rental housing, social housing programs, homelessness, discrimination in housing markets and human rights issues in relation to social welfare and land use planning. [232] Hulchanski is apparently the sole recent scholar, business analyst or researcher to examine the minimum income test in the home rental market, although Harvard's Joint Center for Housing Studies is working on national level analysis of this issue.

The following summarizes and comments on his studies and reports on the origins, use of and justifications for an income test.

- The source of the 3:1 ratio is a 150 year old speculation by a German statistician, who later disavowed his 3:1 "rule" and there have been no subsequent examinations that validate the "rule." "The assertion that a certain ratio is too high for certain households seems to be based on nothing more than ad hoc observations by late 19th and early 20th century social reformers and local public health and social welfare officials about what

[231] https://lims.minneapolismn.gov/Download/File/877/Evictions%20in%20Minneapolis%20Report.pdf

[232] https://socialwork.utoronto.ca/wp-content/uploads/2014/01/Hulchanski-full-CV-September-2019.pdf.

lower income or average wage earners can pay without affecting their ability to pay for food and other necessities." [233]

- The application of the minimum income rule is further undermined by fundamental errors in assessing the income side of the standard. First, simple income definitions ignore how low income families budget and also use informal income streams from family members, churches, social services sources that are used to meet necessities such as rent.[234]
- Further, while Hulchanski does not address this in detail, many Minneapolis households with low cash income also get SNAP food assistance - on average $250 per month in Minnesota. Many such families receive energy assistance, paid to energy businesses, of between $200 and $1400 annually[235]. It is unlikely that these funds are used in the typical minimum test. Further, people with a disability often receive non-taxable Social Security income or other public benefits - thus their nominal income can purchase more housing than comparable nominal wages, which have payroll taxes, benefit costs, etc. deducted before they can be used to pay rent. HUD addresses this in its mortgage insurance program by requiring "grossing up" the non-taxable income by 25% (or the person's prior tax rate).[236] The same concept is applied to child support income by HUD. Finally, and here the value is harder to set - people who have subsidized medical care have more of their income to spend on rent. Households on Medicare, Minnesota Care, VA benefits, etc. should have their ratios calculated taking this into account, if the income:rent analysis is to have any relationship to actual budgets.[237]
- Hulchanski summarizes the income test and affordability issue: "There is no evidence to support its use as a measure of housing affordability, or ability to pay, or the risk of default. There is a great deal of evidence to the contrary

[233] DECLARATION OF J. DAVID HULCHANSKI, Project Sentinel et al. v. 140-20th Avenue Associates et al, paragraph 11, February, 2000. Available from James Wilkinson.

[234] Id. paragraphs 21-27.

[235] https://www.semcac.org/community-development/energy-assistance/. Minnesota state-wide data.

[236] U.S.Department of Housing and Urban Development Handbook 4155.14E.5.b

[237] Indeed these factors may explain why so many Minneapolis families are able to pay more than 50% of their cash income for rent.

– evidence that many households, past and present, pay more than the prescribed ratio without defaulting on their rent."[238]

- Presumably, the reason that many owners wish to use the test is to minimize rent arrearages and avoid financial losses. The previous points undercut the view that a 3:1 test measures affordability and protects against arrearages. The industry may have data that shows a link - causal or merely coincidental - between failure to pay rent and a rent burden of greater than 33% of cash income, but if it exists, it is nowhere to be found.
- Hulchanski also states that rent arrears do not significantly impact the profit and loss statements of typical owners of rental property. He has summarised the sole study on the subject:

"A 1995 study for the Ontario Human Rights Commission assessed whether the risk of tenant default on rent is a significant factor impacting on the profitability or viability of a rental apartment business (N. Barry Lyon Consultants Limited, 1995)[239]. The study found that compared to most investment options, investment in existing rental apartment buildings is a relatively favourable one. There is solid demand, a predictable income stream, and compared to other sectors even within the real estate industry, residential rental businesses weathered the recession of the early 1990s relatively well. Risk of tenant default was found to be 'relatively insignificant as a determinant of the viability of a residential rental business.' Bad debt was found to be less than 1% of gross revenue which is normal for most wholesale and retail businesses, and that default on rent is not a significant cause of business failure…. 'When we considered the effect of a typical level of bad debt on profitability and on return on investment, we found that the effect was relatively insignificant. Underscoring this is the finding that eliminating an average level of bad debt altogether would only increase the rate of return by about one tenth of one percent. Similarly, doubling the average level of bad debt would only reduce the rate of return by one tenth of one percent. Indeed, a minor fluctuation in property tax rates, mortgage rates, or an unexpected repair bill, pose equal and potentially more

[238] Declaration, paragraph 33.

[239] Available from author, Wilkinson.

> serious risks for landlords than is the risk of increased default.' (N. Barry Lyon Consultants Limited, 1995:44) The study concluded that 'tenant default is not a significant factor in determining the viability of a landlord's business' and that 'restricting applicants to apartment buildings on the basis of income in the hopes of reducing default, may be counter-productive to the landlord.' The practice may create additional costs 'by restricting demand and increasing vacancy, rather than creating any significant savings in the area of bad debts.' (N. Barry Lyon Consultants Limited, 1995:45).

Similar business income and expense data is not available to us, but an examination of evictions in Minneapolis by the City provides suggestions as to the extent and degree of seriousness of non-payment of rent.[240] The total number of evictions filed against Minneapolis renters in 2015 was 3140, just 3% of the 92,000 total rental households. 93% of evictions were for rent arrears averaging $2000 (after $324 in court fees) with a median of $1700 (including fees) - roughly two months of unpaid rent. It seems unlikely that there will be a large number of situations where renters are permitted to stay in their home for three, four or more months without rent payments. Some of those court cases are resolved by the tenant paying the arrearage and fees (probably about 19% of nonpayment cases). So there remain approximately 2400 Minneapolis rent cases in court with an average alleged debt of $2000, including fees, for a total of more than $4,800,000 in 2015. ($4,080,000 using the mean allegation.)

It is conservative to estimate that at least third of this sum is recovered via withheld damage deposits (which is usually at least equal to one month of rent) or other collection methods, This figure of $3,168,000 is not an insignificant sum, but spread over 92,000 rental households in the City, it is just $34 per year. With an average yearly rent of more than $12,480 per year in the City in 2015, this amounts to 0.27% of revenue.

If the court cases show only one-fifth of the nonpayment problem (assuming the same average arrearages and the same one-third of the arrearages recovered

[240] https://lims.minneapolismn.gov/Download/File/877/Evictions%20in%20Minneapolis%20Report.pdf

through damage deposits or other collection methods) the average landlord's lost revenue is $170 per year per unit or 1.3% of revenue, far less than taxes, insurance and other costs. It is also far less, one-quarter of the cost of vacant apartments and vacancies were 5.6% in 2015[241]. A portion of that uncollected rent will reduce the owners' income taxes as a bad debt business deduction, further mitigating the effect of nonpayment.

It is therefore critical to consider the following.

- Would universal application of the income test have avoided rent arrears? No, since as already shown, renters almost always pay the rent, no matter how high a portion of their cash income goes to rent. No, because the applicant's income might decline after initially meeting the 3:1 standard. No, because there is no evidence that application of such a screen results in any, let alone, consequential differences in rent arrears.
- Would requiring flexibility by owners, like the City now does, result in financial losses? No, since uncollected rent is a miniscule portion of the expenses of the enterprises.
- What is the effect of use of this screening tool which does nothing to serve its alleged purpose? Owners have been using an income test for years. It gives owners a way to screen for wealthier, higher earning applicants, who, perhaps not coincidentally are less likely to be people of color or living with disabilities. The foregoing shows how its use reduces housing choice for a high proportion of Minneapolis residents, particularly families already burdened with low income and historic and current discrimination. Whether intentional or just a consequence of uninformed practice, there is no question that the screening tool is an impediment to fair housing.

James Wilkinson

October 12, 2020

[241] https://fred.stlouisfed.org/series/MNRVAC