

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 providers, 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 Region¹, 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 area 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)
- Inquilinx 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 (MICAHA) registered concerns with community input and requested more clear specific benchmarks, timelines, outcomes and resources for the goals and strategies.
 - *Response: The Consultants appreciate MICAHA'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 MICAHA 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.*