

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>

⁷⁸Public 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://metro council.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.stlouis park.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 County 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 and 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 facilities. 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 but still 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 from 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. Inquilinx 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://metro council.org/Data-and-Maps/Publications-And-Resources/MetroStats/Land-Use-and-Development/The-Twin-Cities-Region-s-Local-Forecasts.aspx>

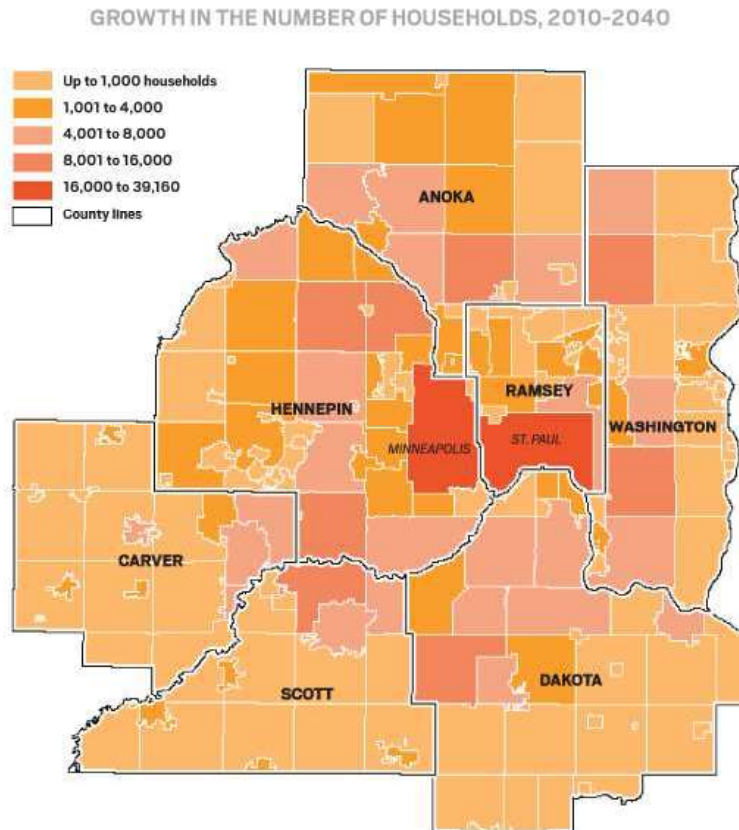
Land Use and Zoning Laws

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 Policy¹⁰³, 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://metro council.org/Planning/Publications-And-Resources/Thrive-MSP-2040-Plan-\(1\)/6_ThriveMSP2040_LandUsePolicy.aspx](https://metro council.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 borrowers 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 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 areas 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%20e-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_CH12-300BUMAOCOCO

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 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 Contributing 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

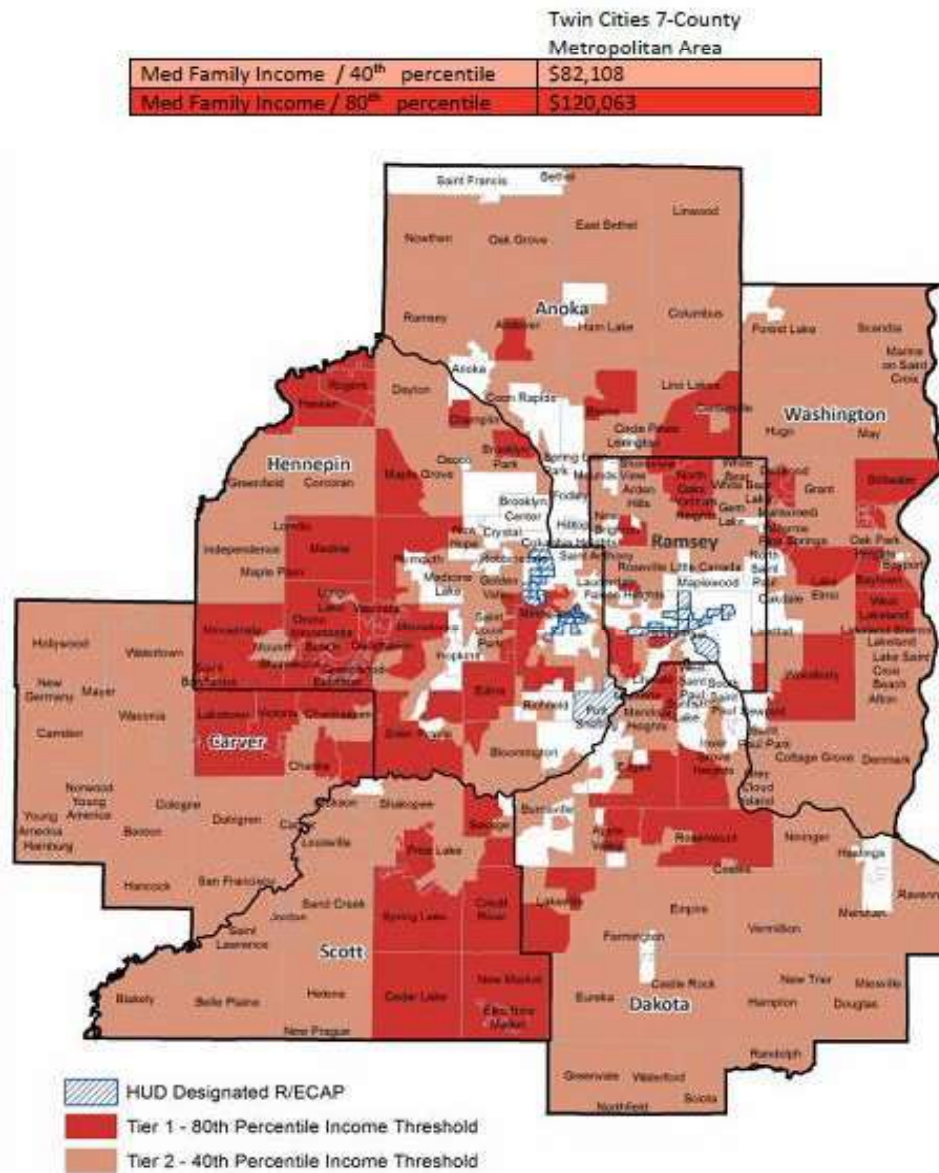
¹⁶⁵ <https://www.stpaul.gov/sites/default/files/Media%20Root/Planning%20%26%20Economic%20Development/2021-LIHTC-Qualified-Allocation-Plan.pdf>

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



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.

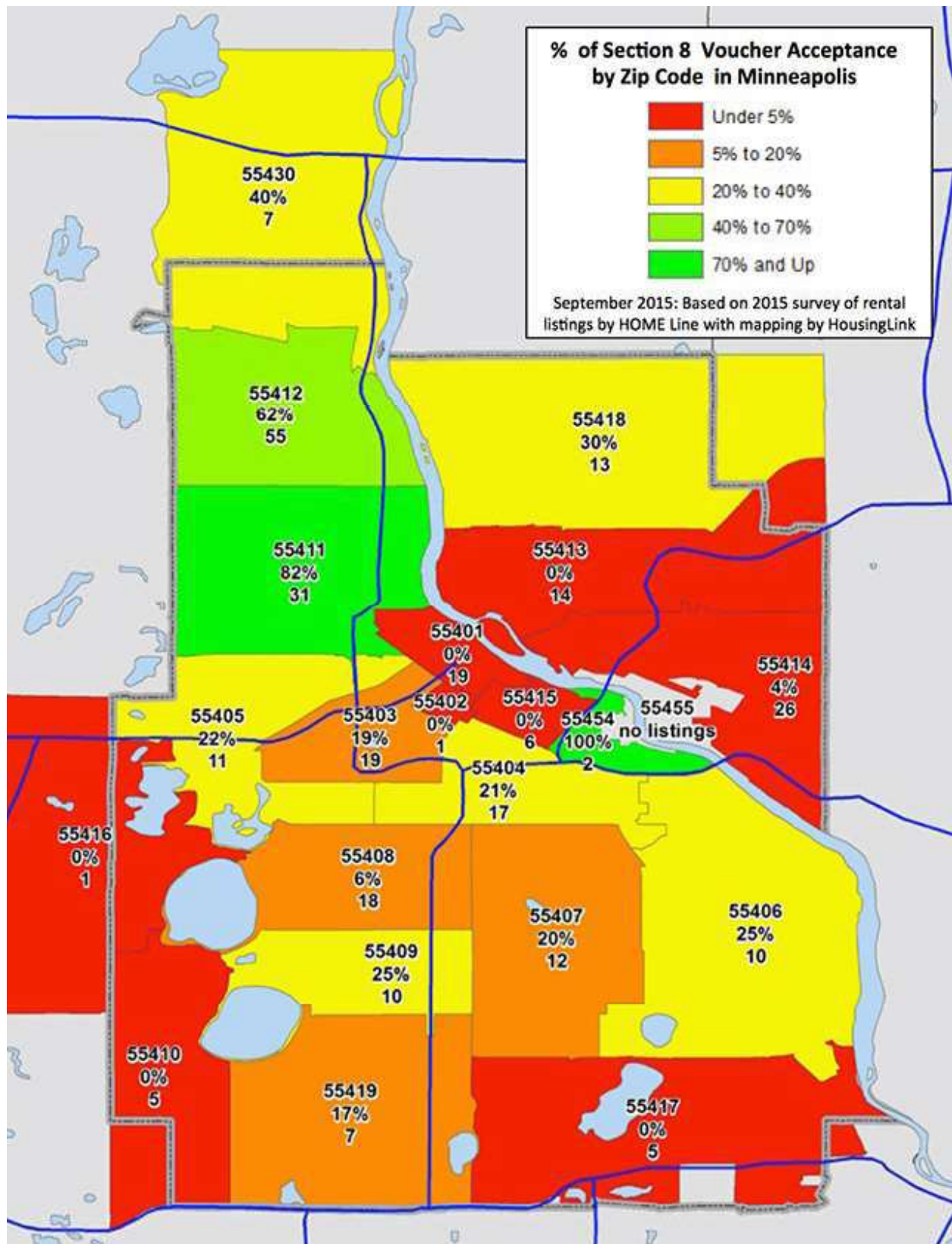
During community engagement, several legal and other service providers reported extensive source of income discrimination. Public Housing Authorities reported that lack of landlord acceptance is one of the factors in voucher holders being unable to find housing for months after receiving one. In addition 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/>



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](https://files.hudexchange.info/resources/documents/AFFH-T-Data-Documentation-(AFFHT0004a)-March-2018.pdf)

¹⁷³ https://www.census.gov/hhes/www/housing/resse/pd/app_b.pdf

Dissimilarity Index¹⁷⁴

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 j th 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%.

$$\frac{R}{ECAP}_i = yes \dots if \dots \left\{ \begin{array}{l} PovRate_i \geq 0.4 \quad \cap \quad \left[\frac{(Pop_i - NHW_i)}{Pop_i} \right] \geq 0.50 \end{array} \right.$$

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/resseseg/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.

$$envirohealth_i = 100 - \frac{1}{2}r_i + \frac{1}{2}n_i$$

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 Class¹⁷⁷

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

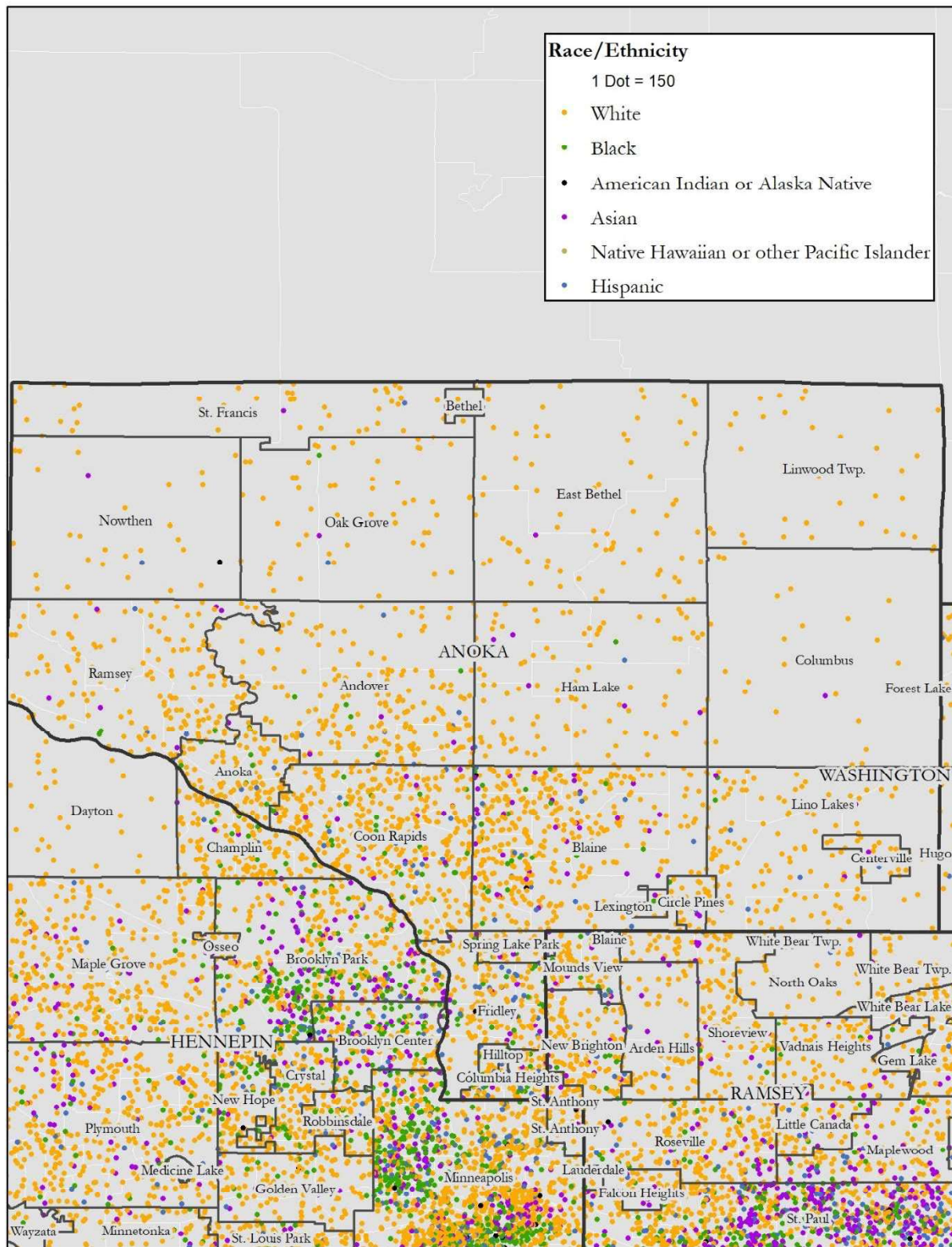
All data in the Disability section is sourced from American Community Survey, 2013-2017 Estimates, unless otherwise indicated.

Data Source: American Community Survey (ACS) 2013-2017.

¹⁷⁷ This screenshot was taken from the AFFH-T documentation (footnote 1).

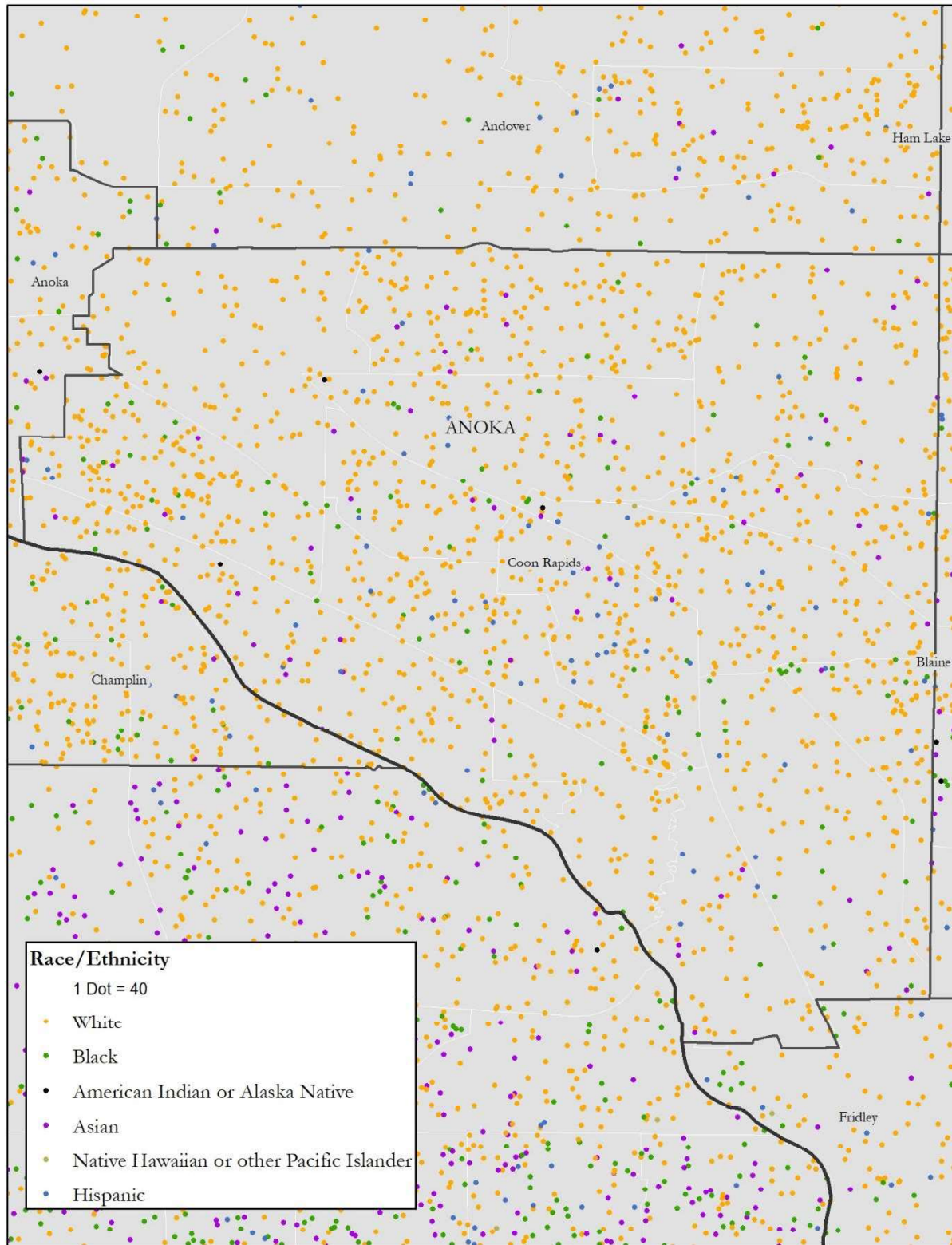
C. Segregation/Integration Appendix

Map 1: Race/Ethnicity, Anoka County¹⁷⁸



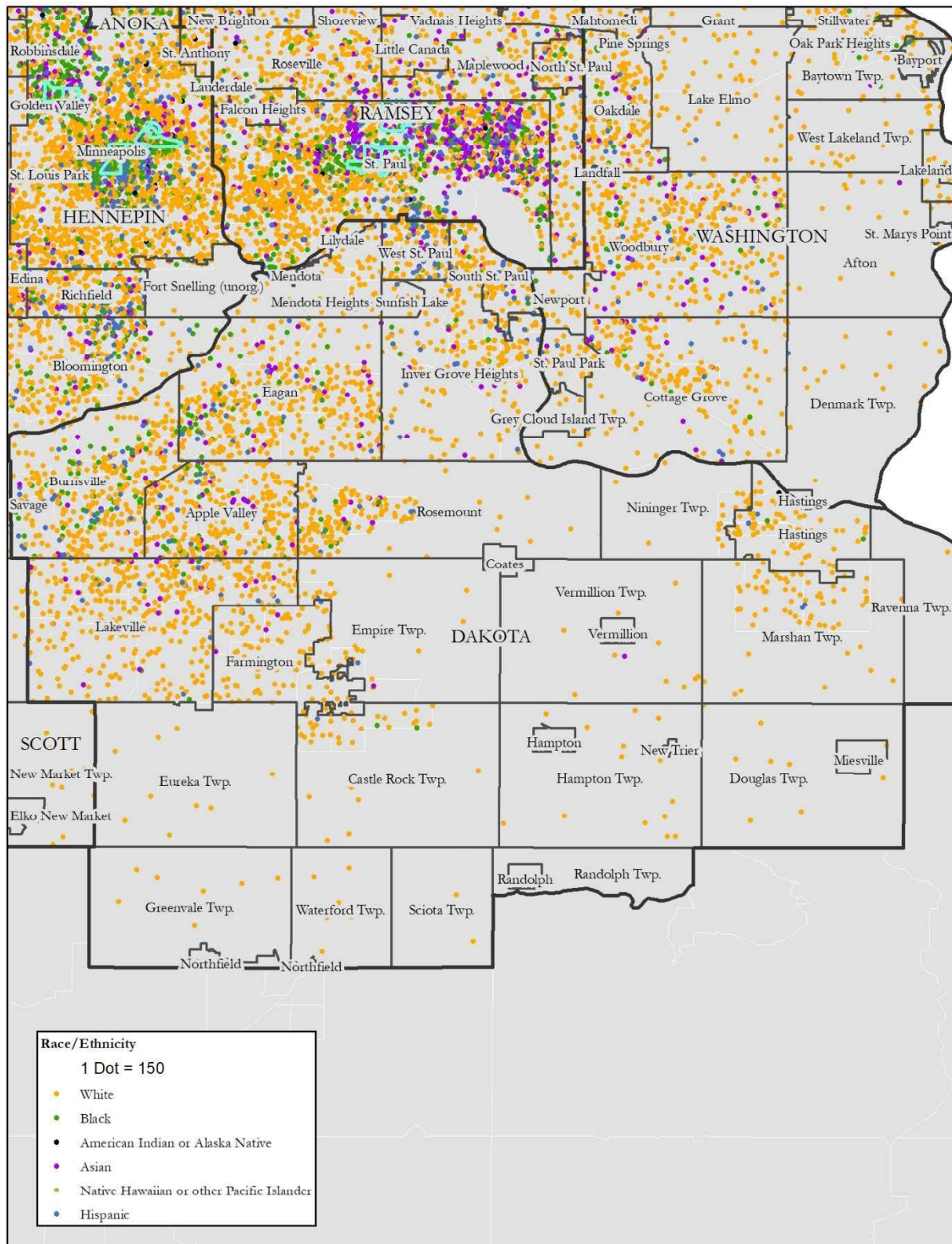
¹⁷⁸ American Community Survey Estimates, 2013-2017.

Map 2: Race/Ethnicity, Coon Rapids¹⁷⁹



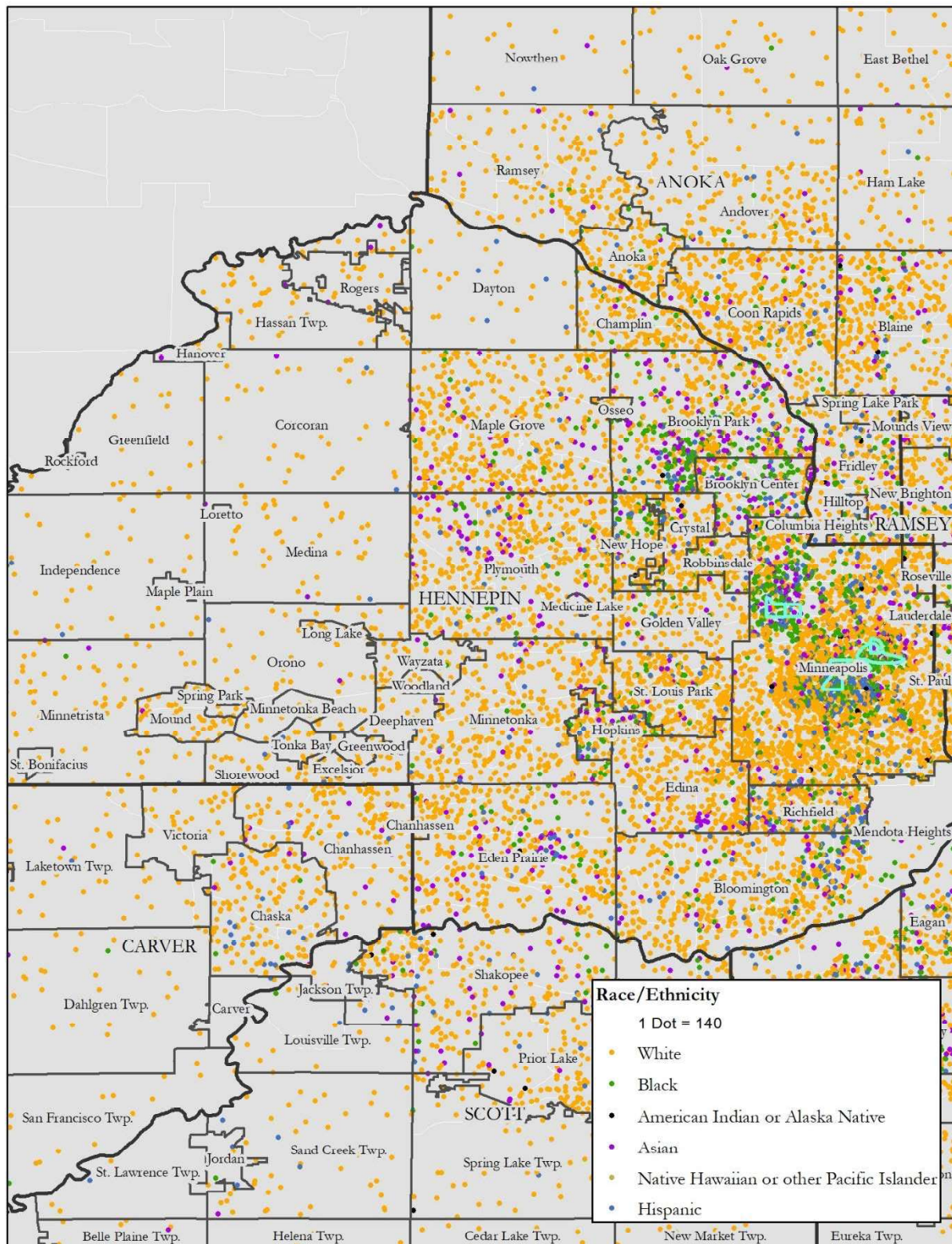
¹⁷⁹ American Community Survey Estimates, 2013-2017.

Map 3: Race/Ethnicity, Dakota County¹⁸⁰



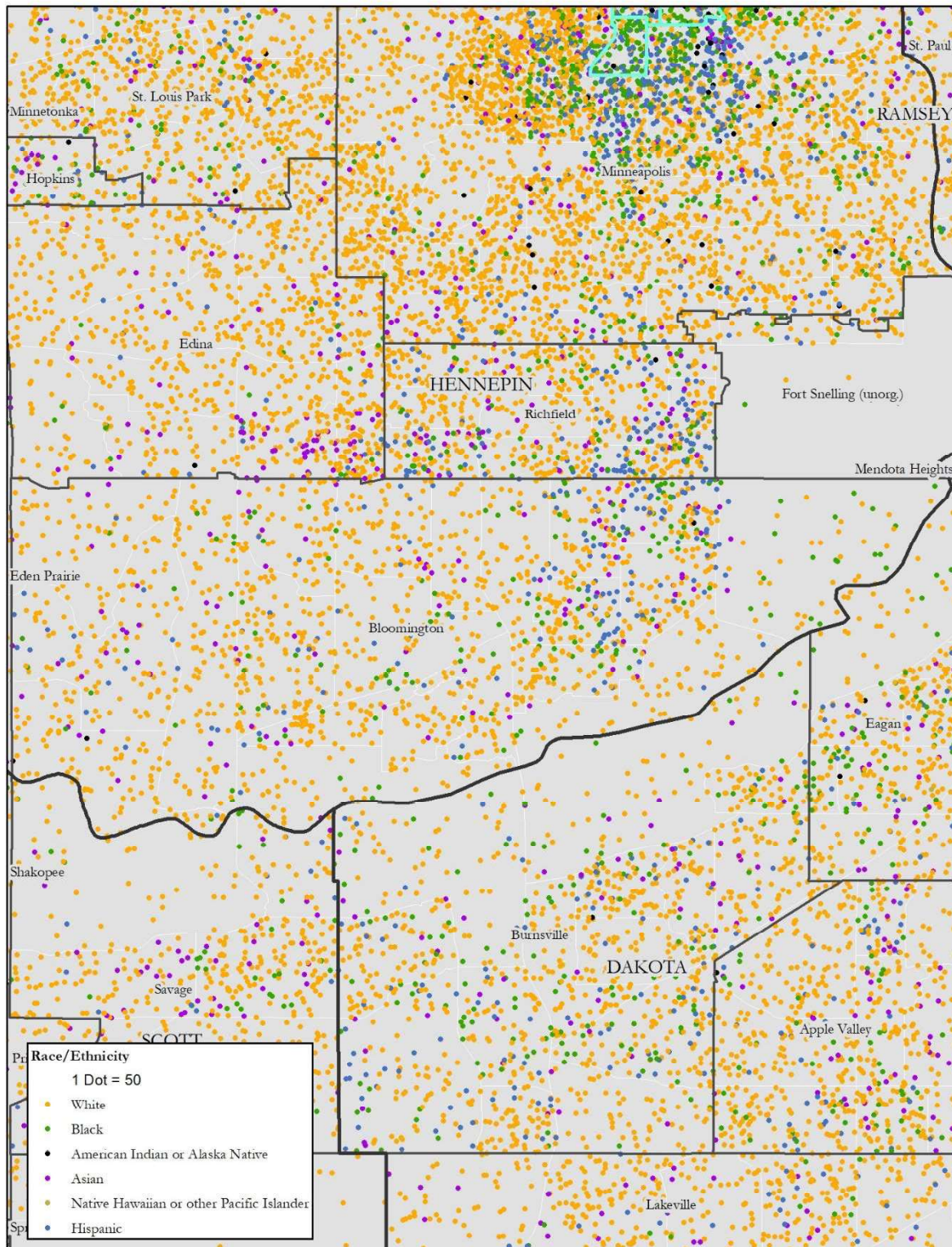
¹⁸⁰ American Community Survey Estimates, 2013-2017.

Map 4: Race/Ethnicity, Hennepin County¹⁸¹



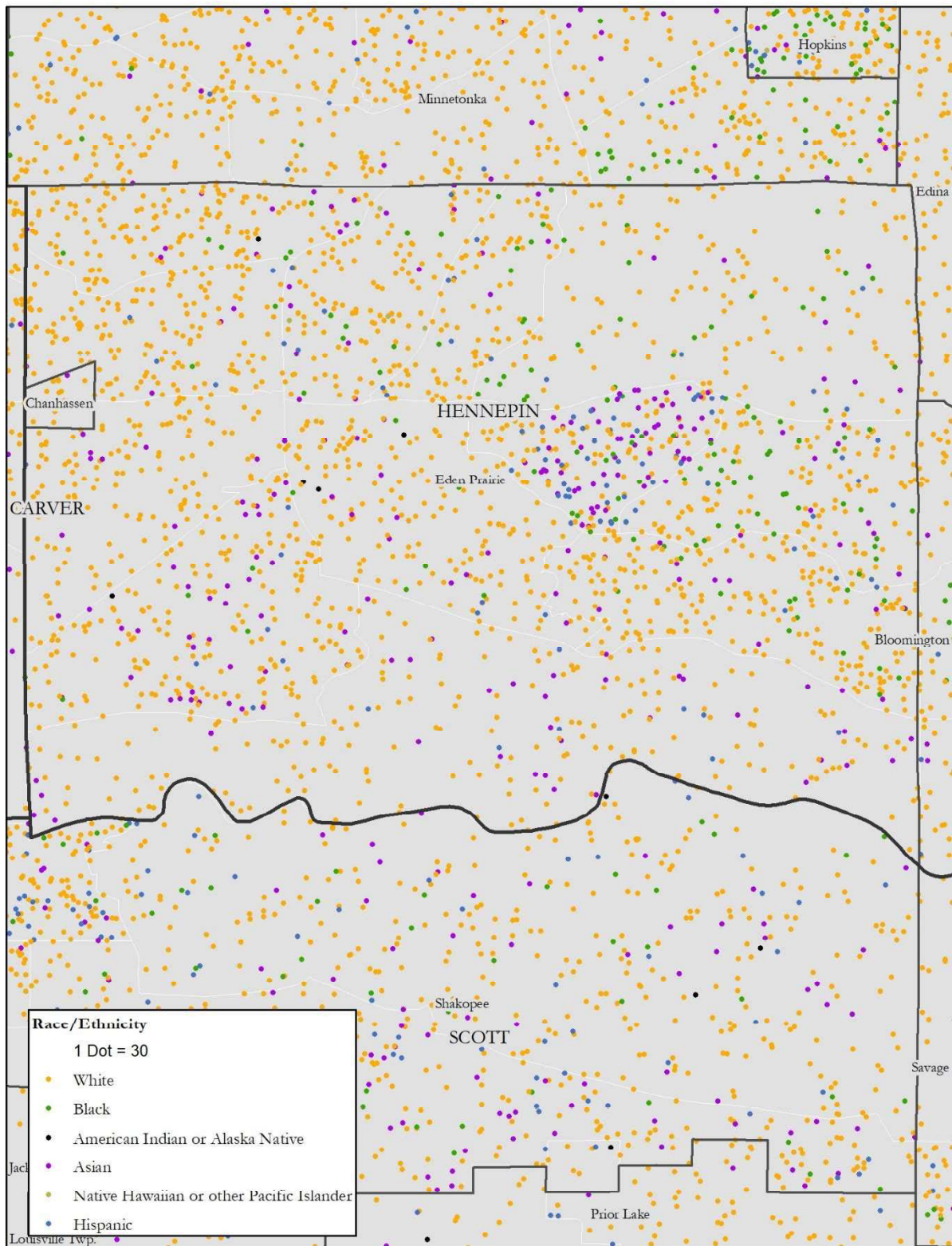
¹⁸¹ American Community Survey Estimates, 2013-2017.

Map 5: Race/Ethnicity, Bloomington¹⁸²



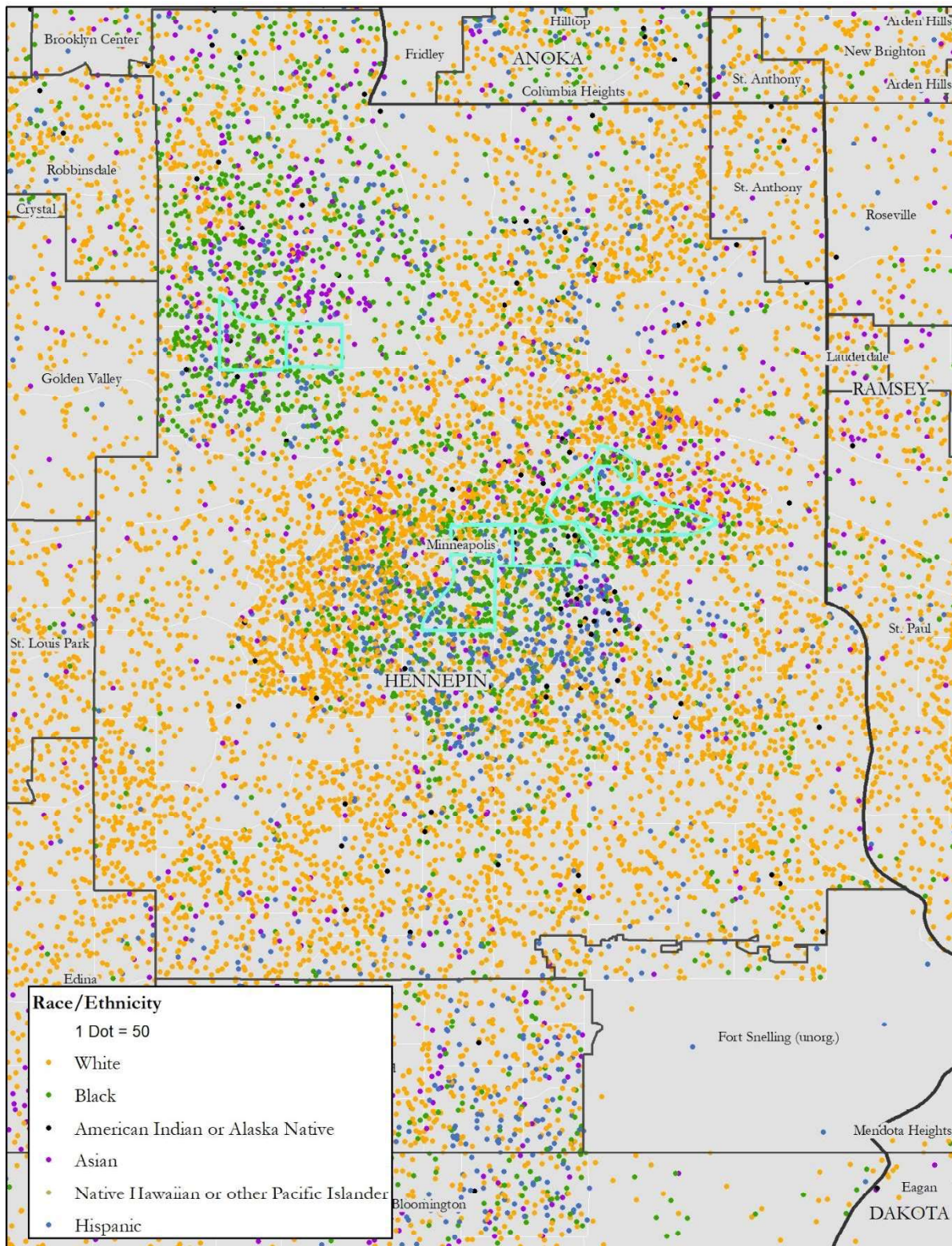
¹⁸² American Community Survey Estimates, 2013-2017.

Map 6: Race/Ethnicity, Eden Prairie¹⁸³



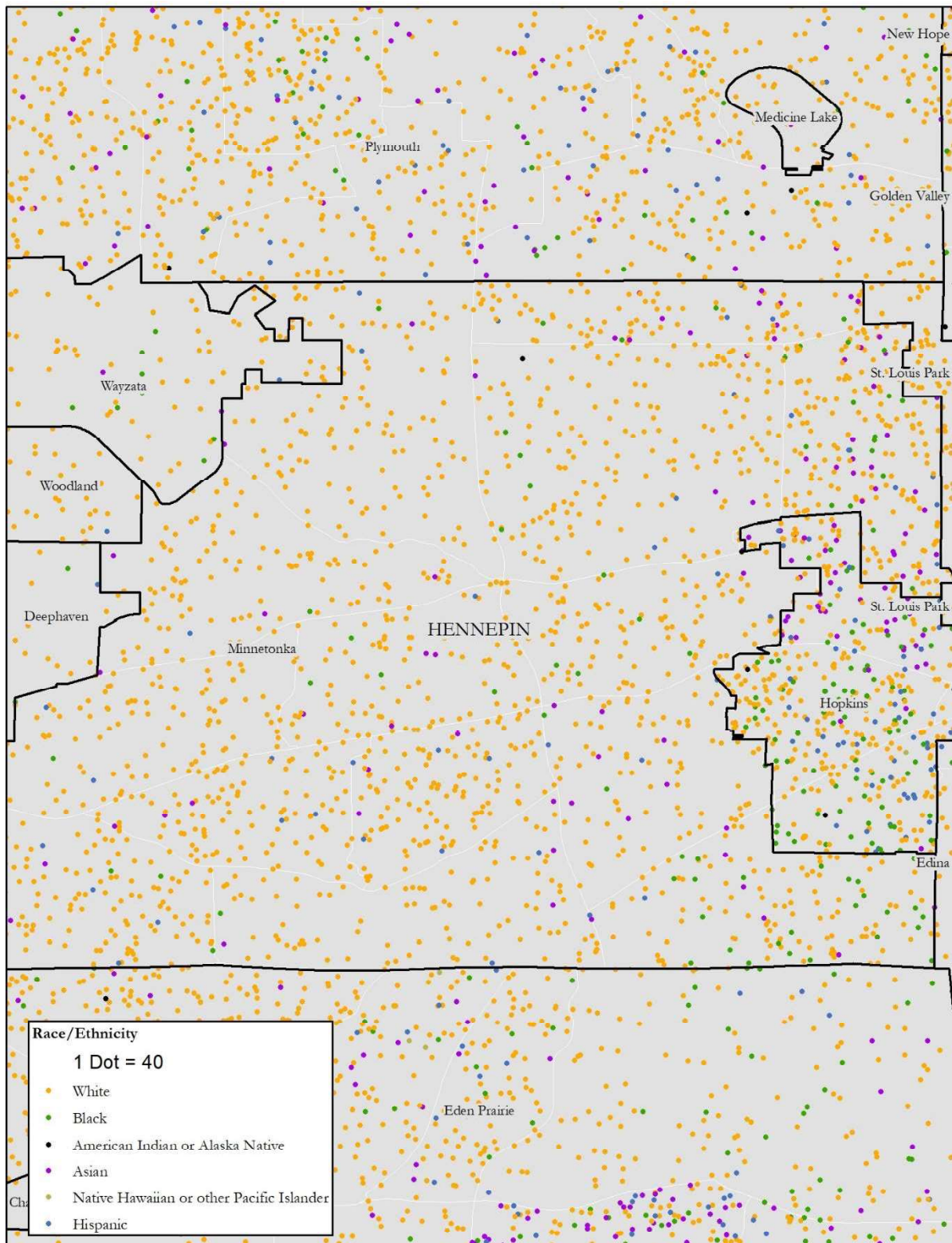
¹⁸³ American Community Survey Estimates, 2013-2017.

Map 7: Race/Ethnicity, Minneapolis¹⁸⁴



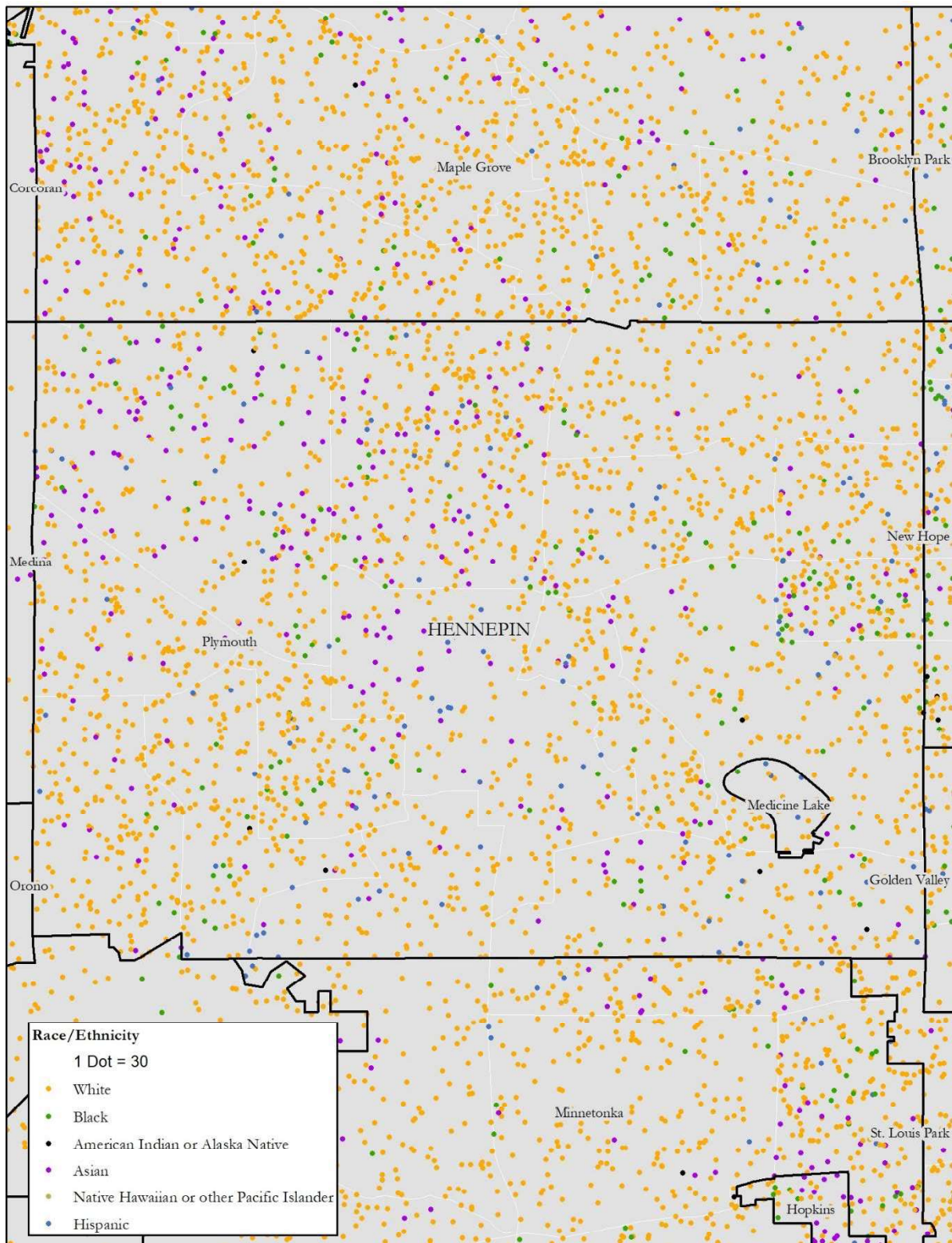
¹⁸⁴ American Community Survey Estimates, 2013-2017.

Map 8: Race/Ethnicity, Minnetonka¹⁸⁵



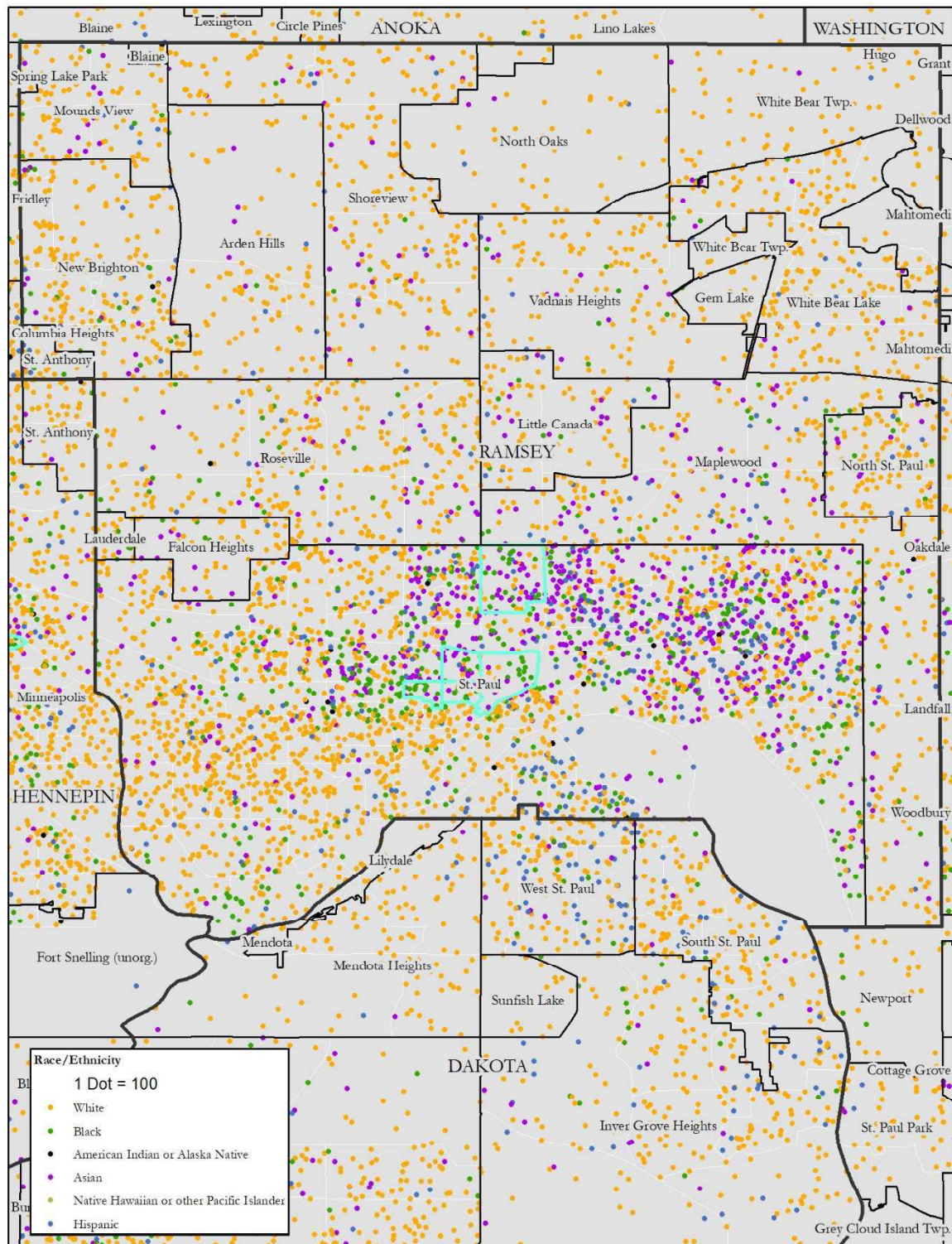
¹⁸⁵ American Community Survey Estimates, 2013-2017.

Map 9: Race/Ethnicity, Plymouth¹⁸⁶



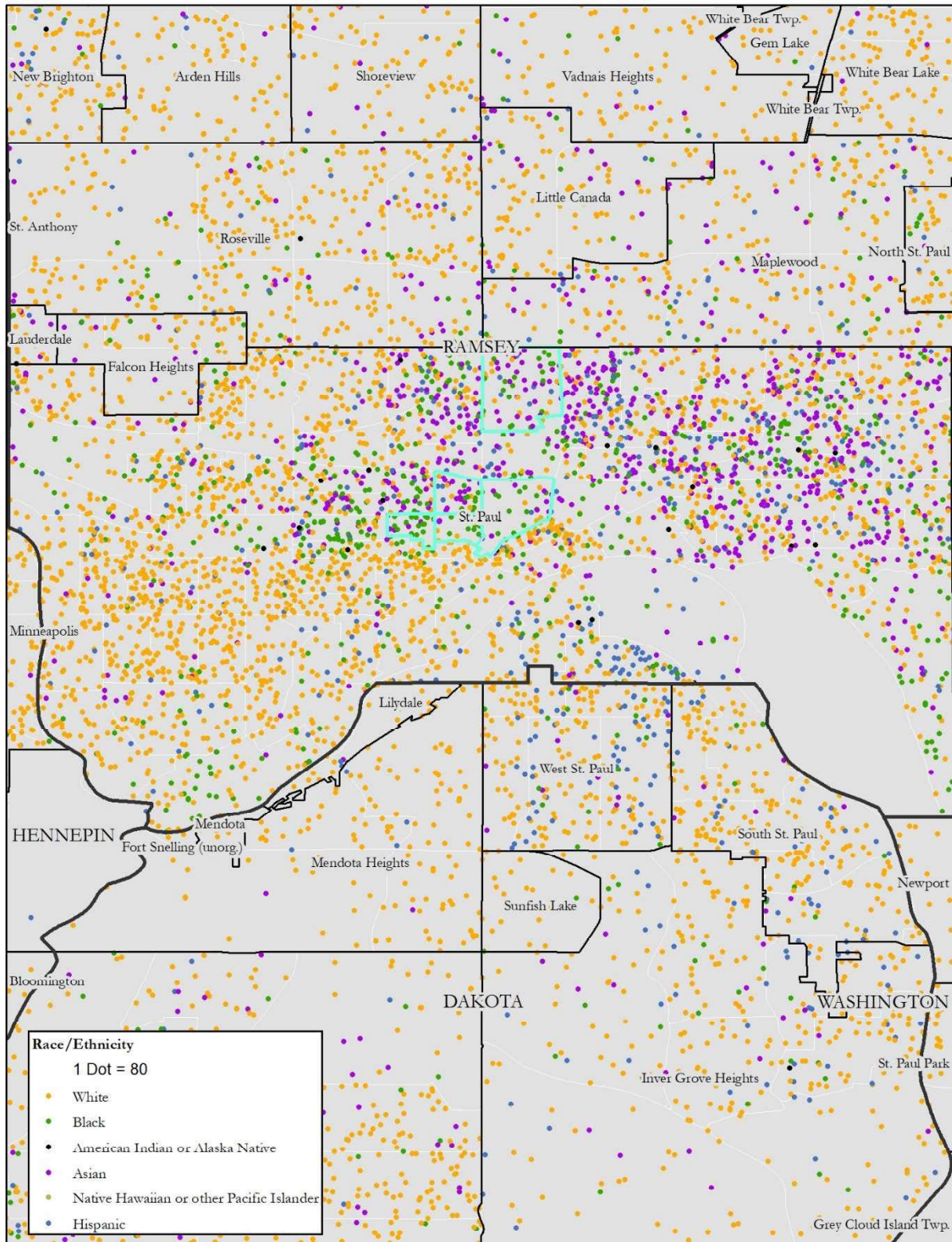
¹⁸⁶ American Community Survey Estimates, 2013-2017.

Map 10: Race/Ethnicity, Ramsey County ¹⁸⁷



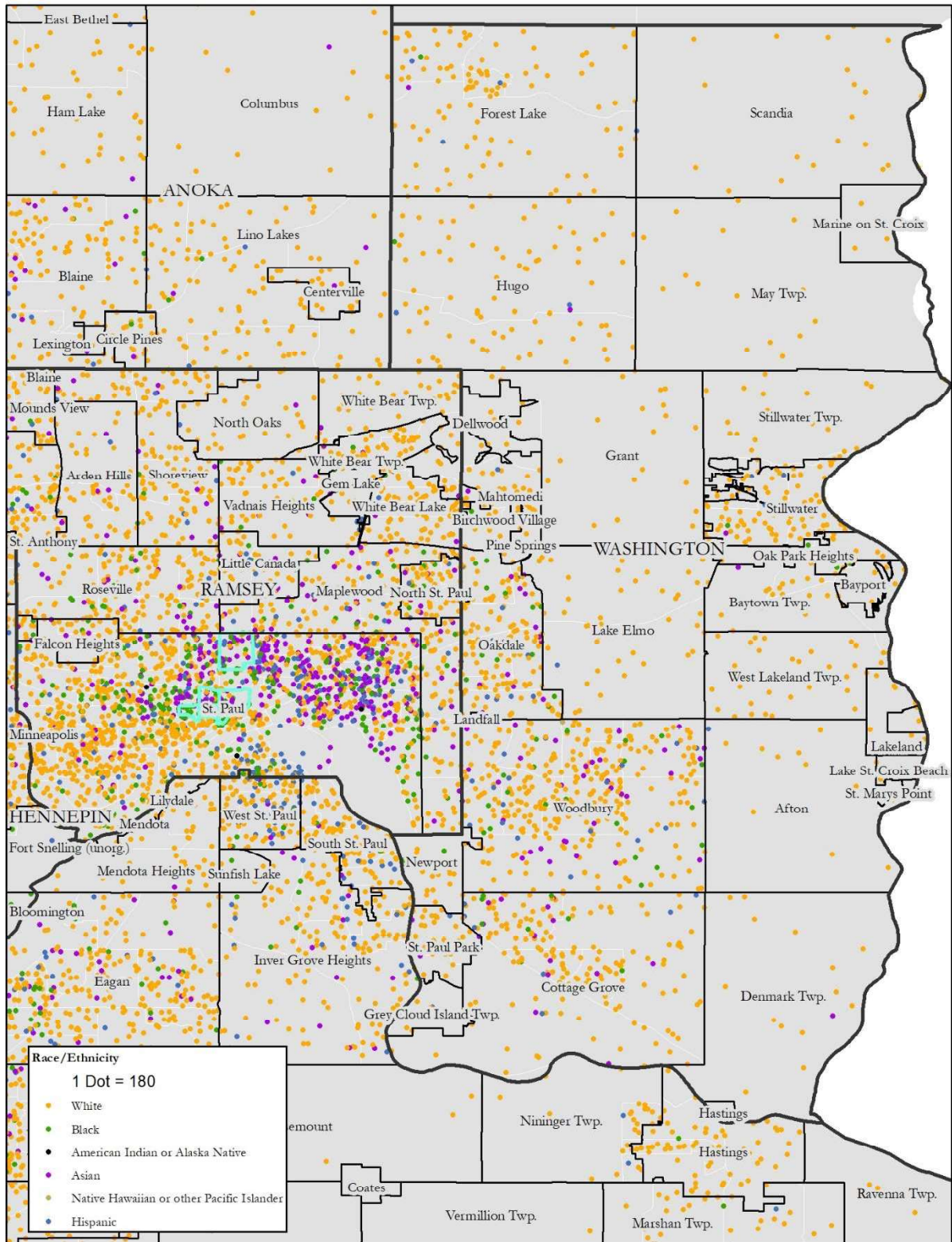
¹⁸⁷ American Community Survey Estimates, 2013-2017.

Map 11: Race/Ethnicity, St. Paul¹⁸⁸



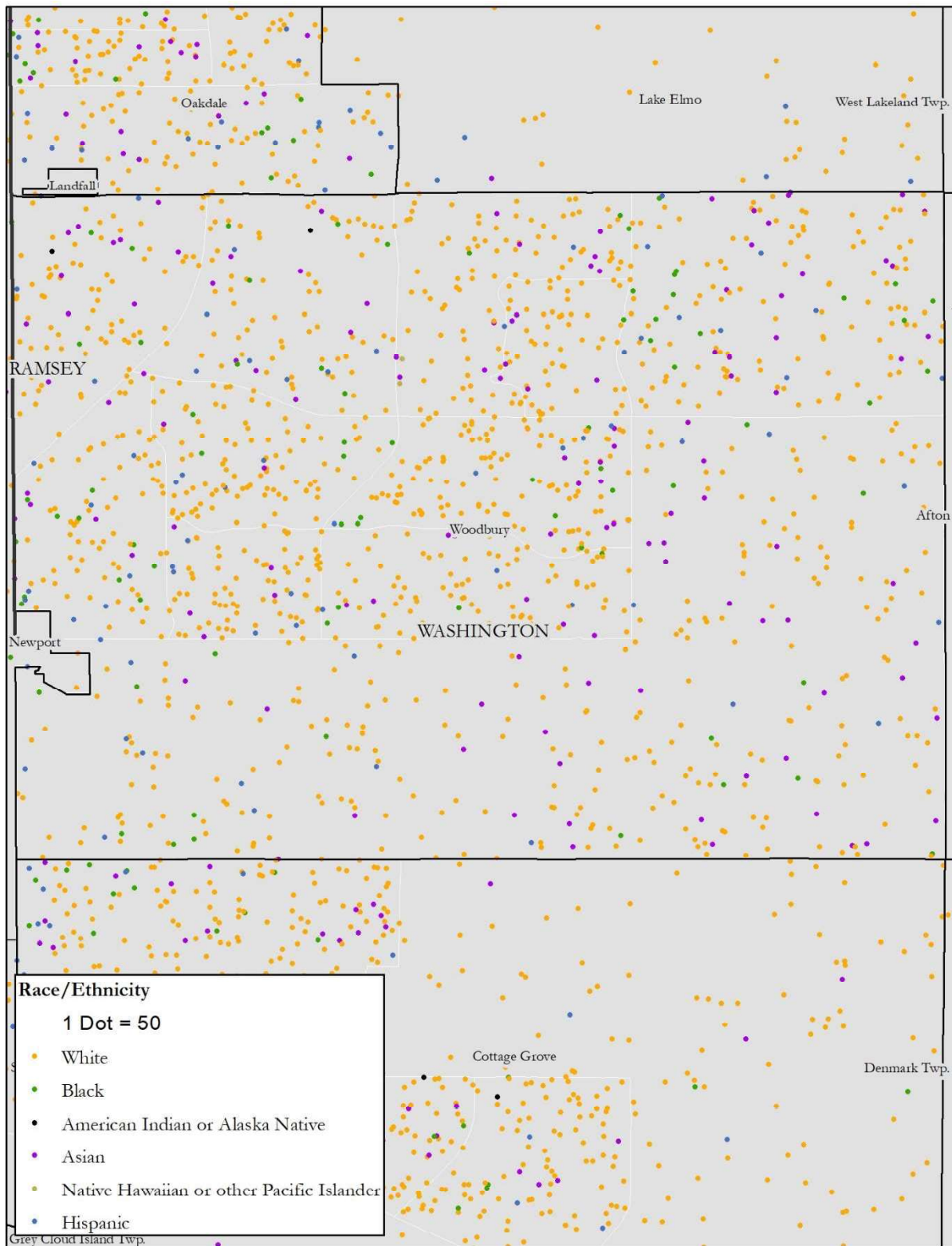
¹⁸⁸ American Community Survey Estimates, 2013-2017.

Map 12: Race/Ethnicity, Washington County¹⁸⁹



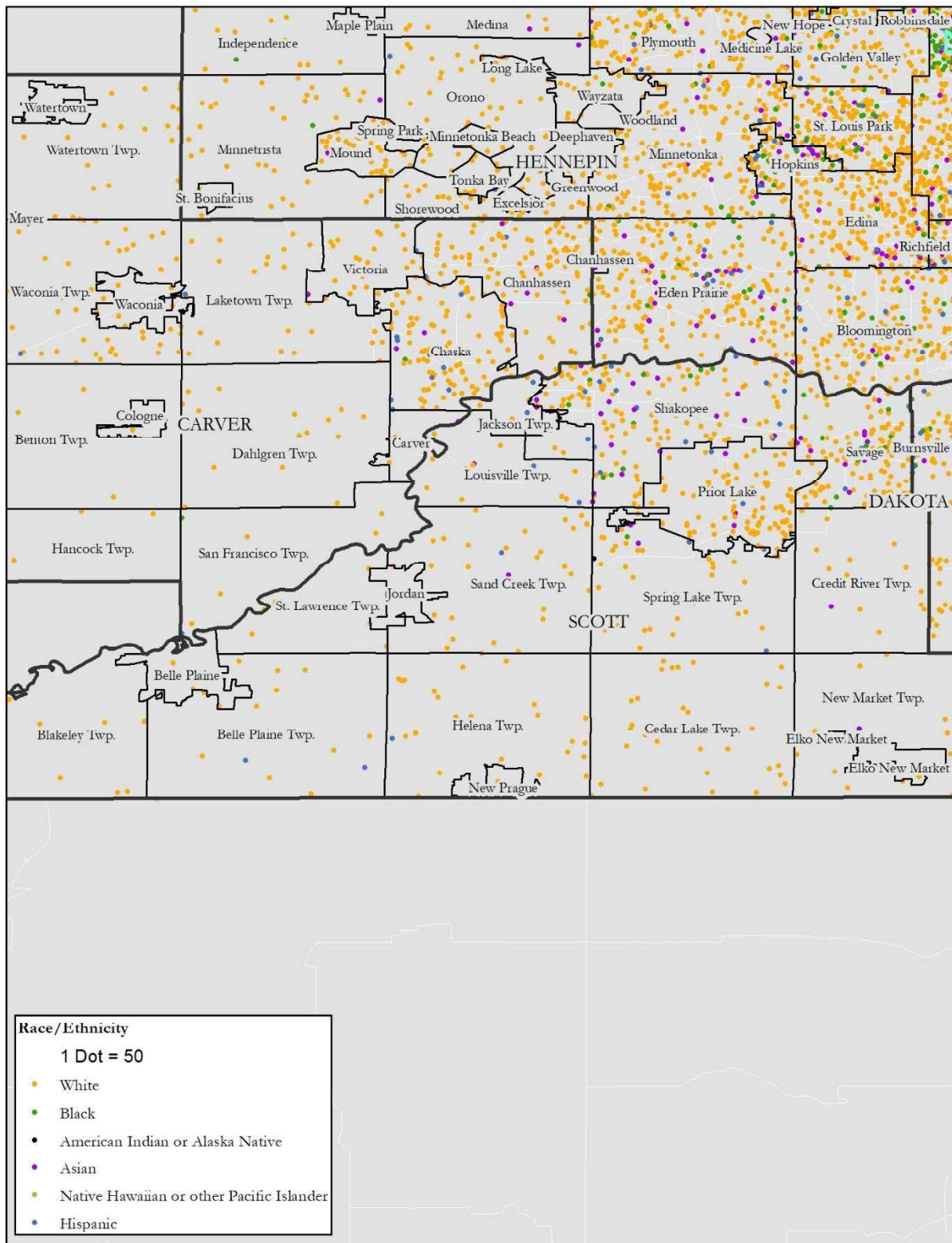
¹⁸⁹ *American Community Survey Estimates, 2013-2017.*

Map 13: Race/Ethnicity, Woodbury¹⁹⁰



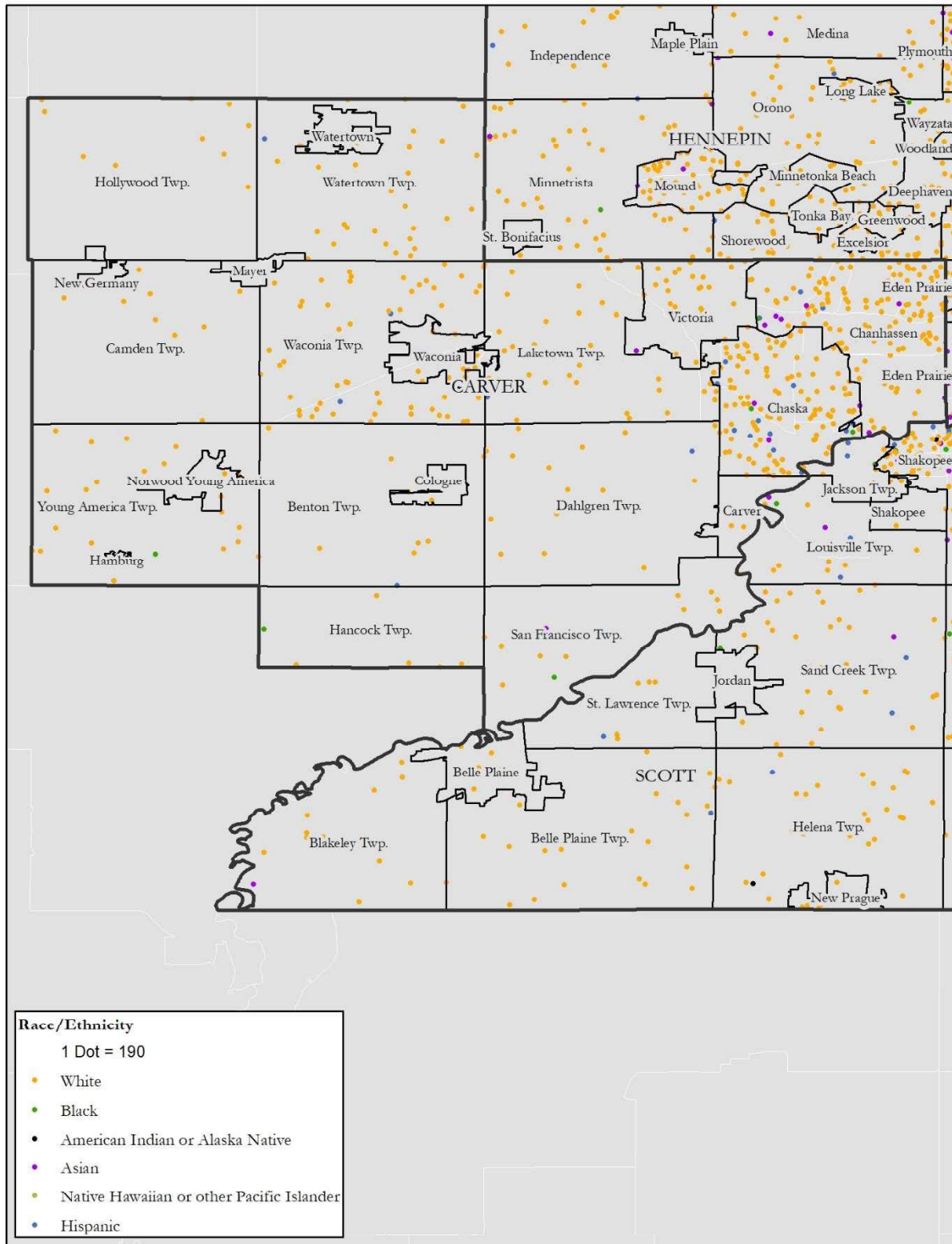
¹⁹⁰ American Community Survey Estimates, 2013-2017.

Map 14: Race/Ethnicity, Scott County¹⁹¹



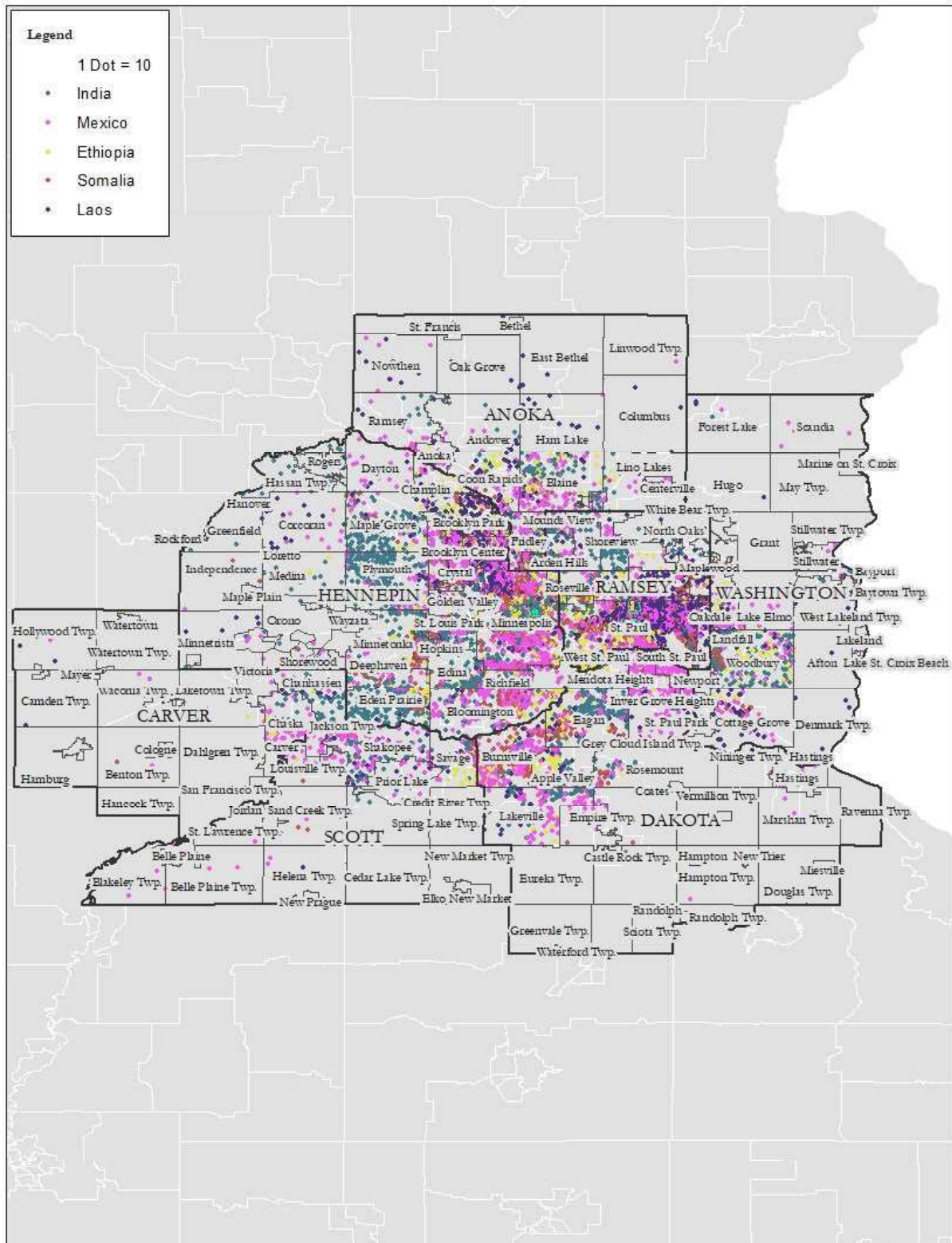
¹⁹¹ American Community Survey Estimates, 2013-2017.

Map 15: Race/Ethnicity, Carver County¹⁹²



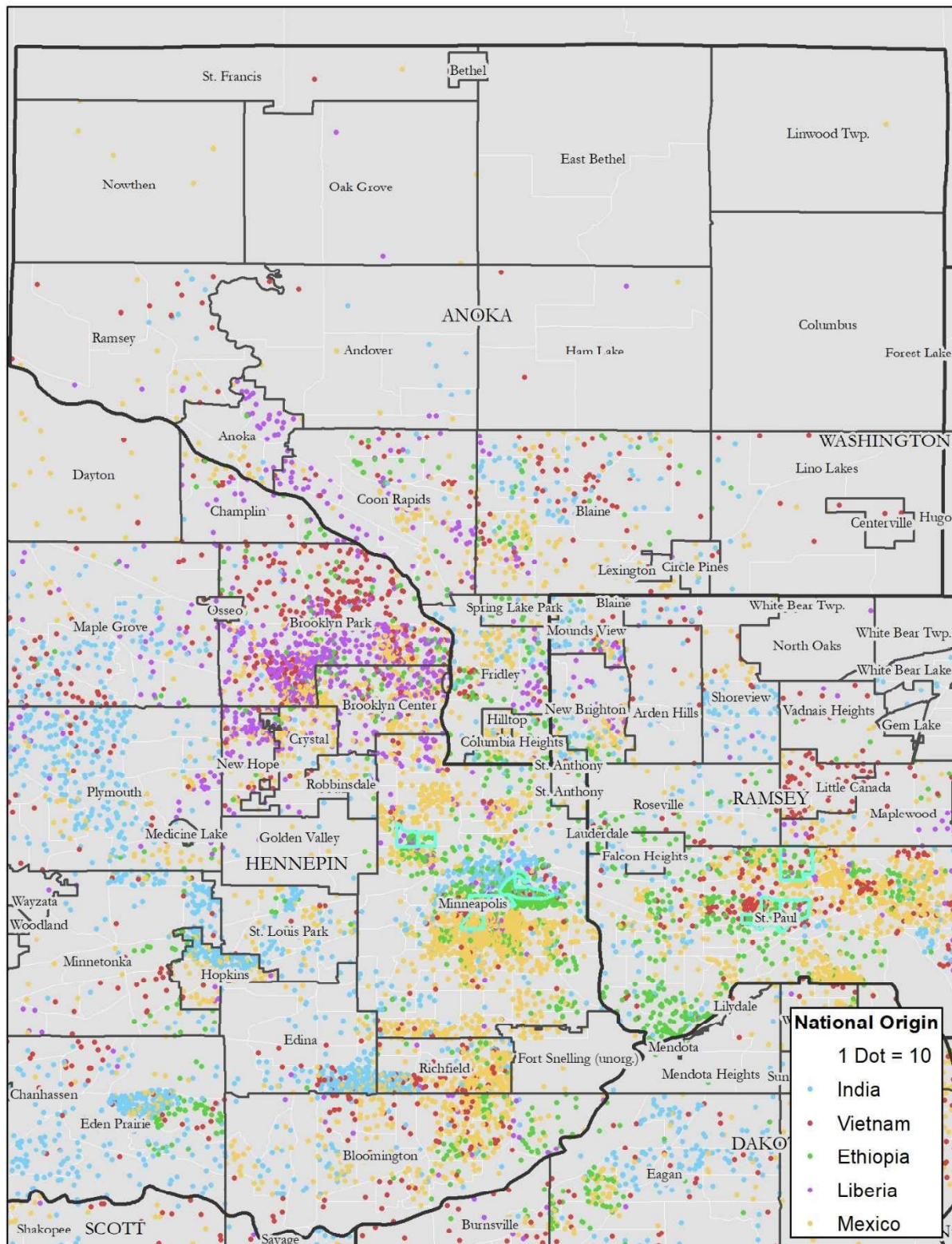
¹⁹² American Community Survey Estimates, 2013-2017.

Map 16: National Origin, Region¹⁹³



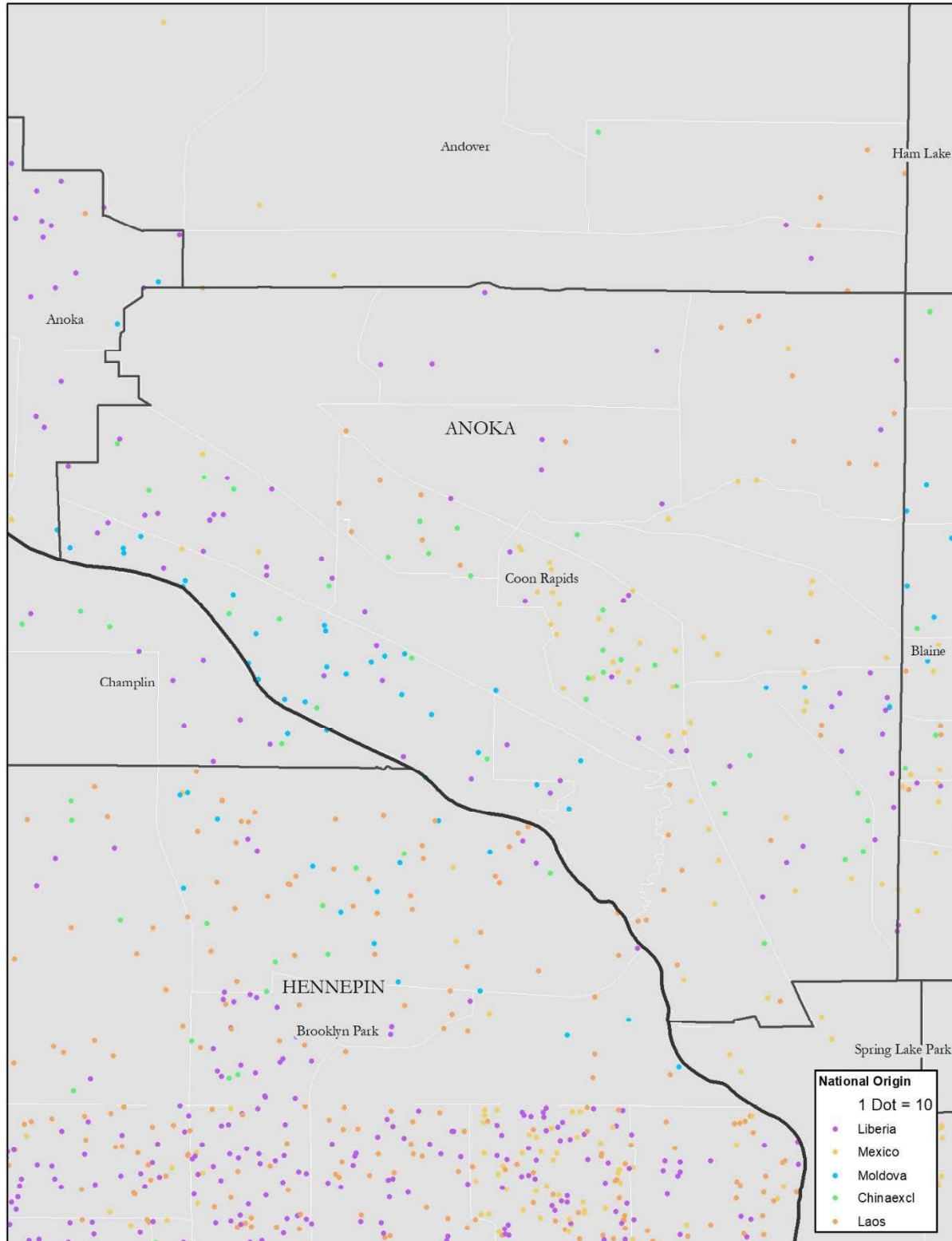
¹⁹³ *American Community Survey Estimates, 2013-2017.*

Map 17: National Origin, Anoka County¹⁹⁴



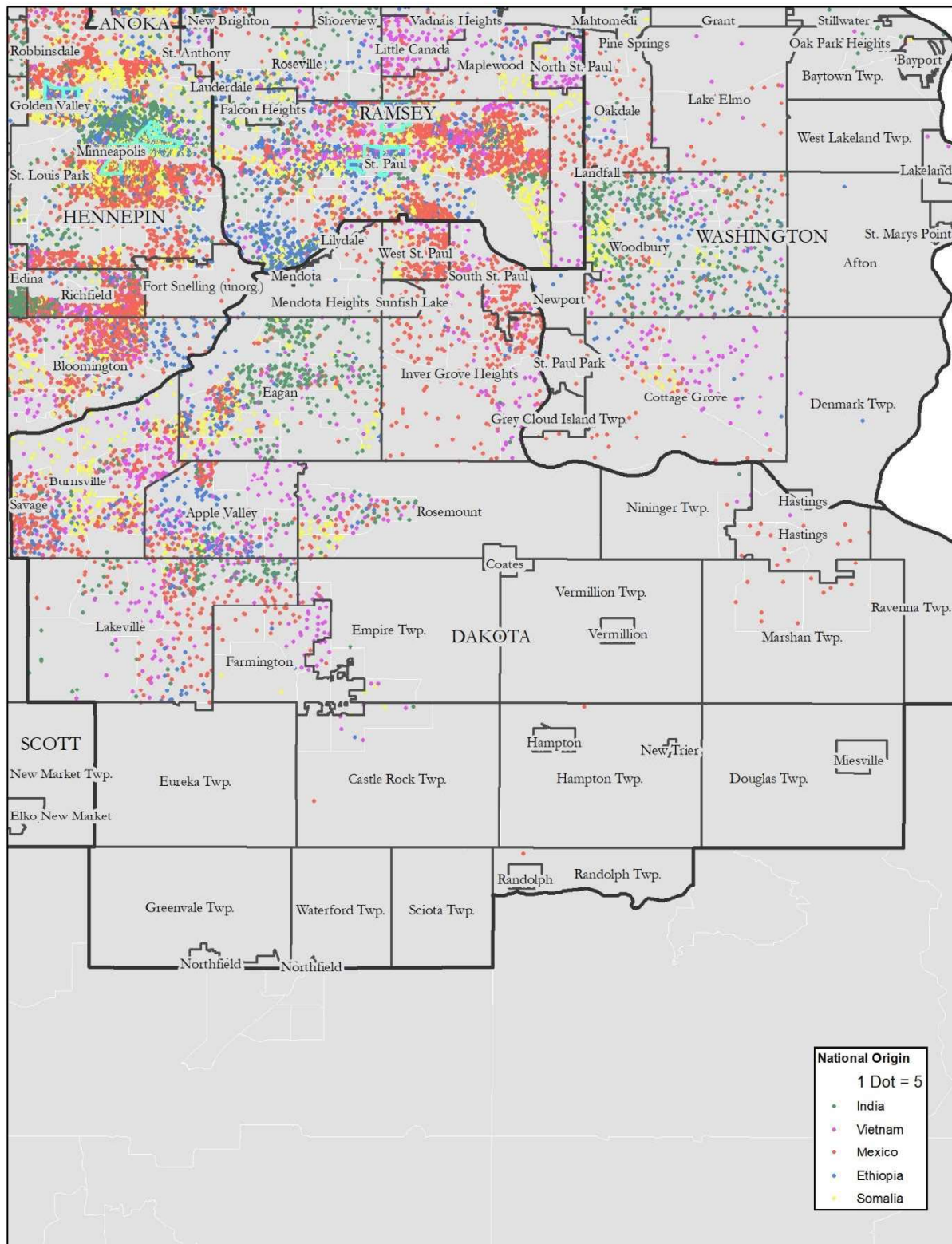
¹⁹⁴ American Community Survey Estimates, 2013-2017.

Map 18: National Origin, Coon Rapids¹⁹⁵



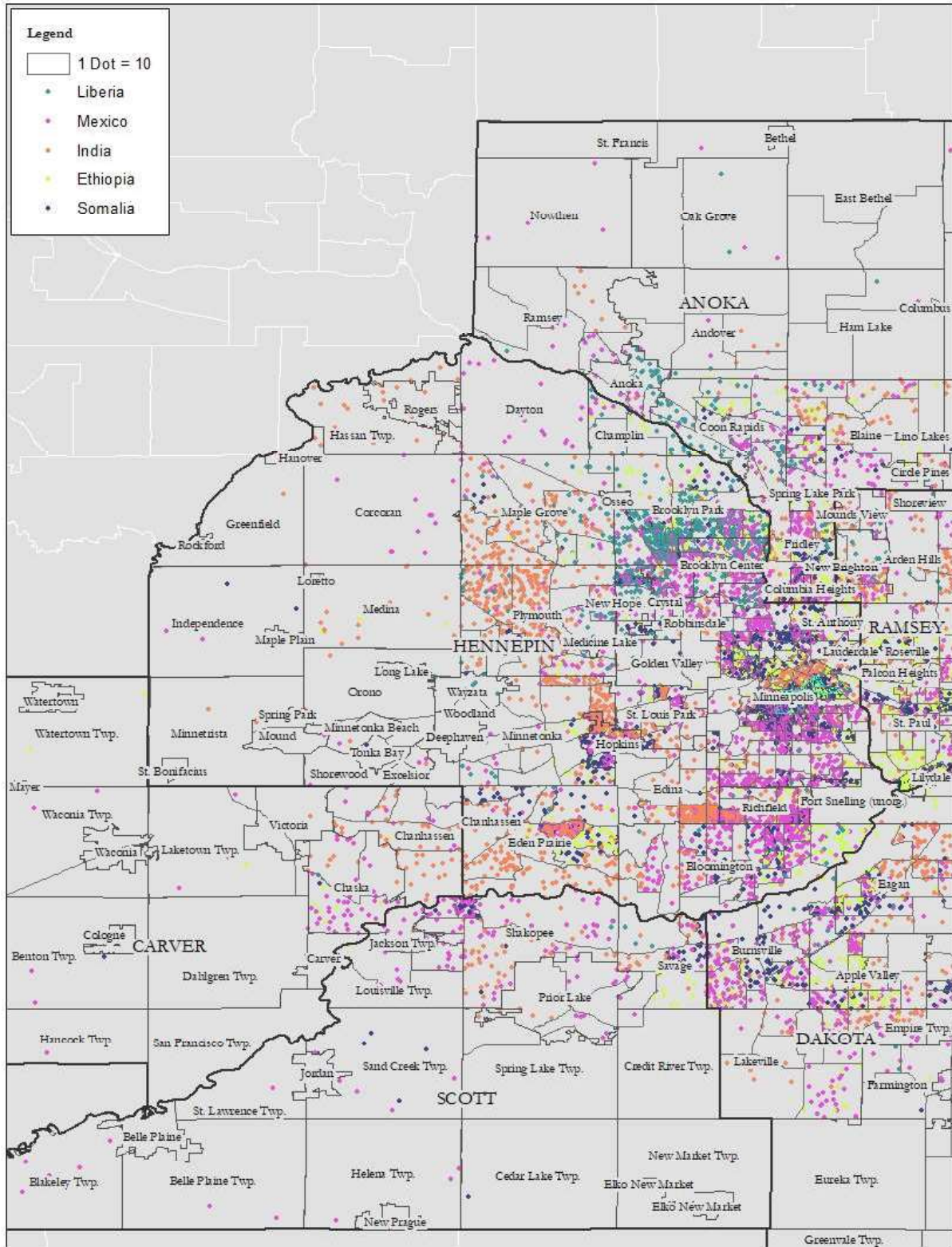
¹⁹⁵ American Community Survey Estimates, 2013-2017.

Map 19: National Origin, Dakota County¹⁹⁶



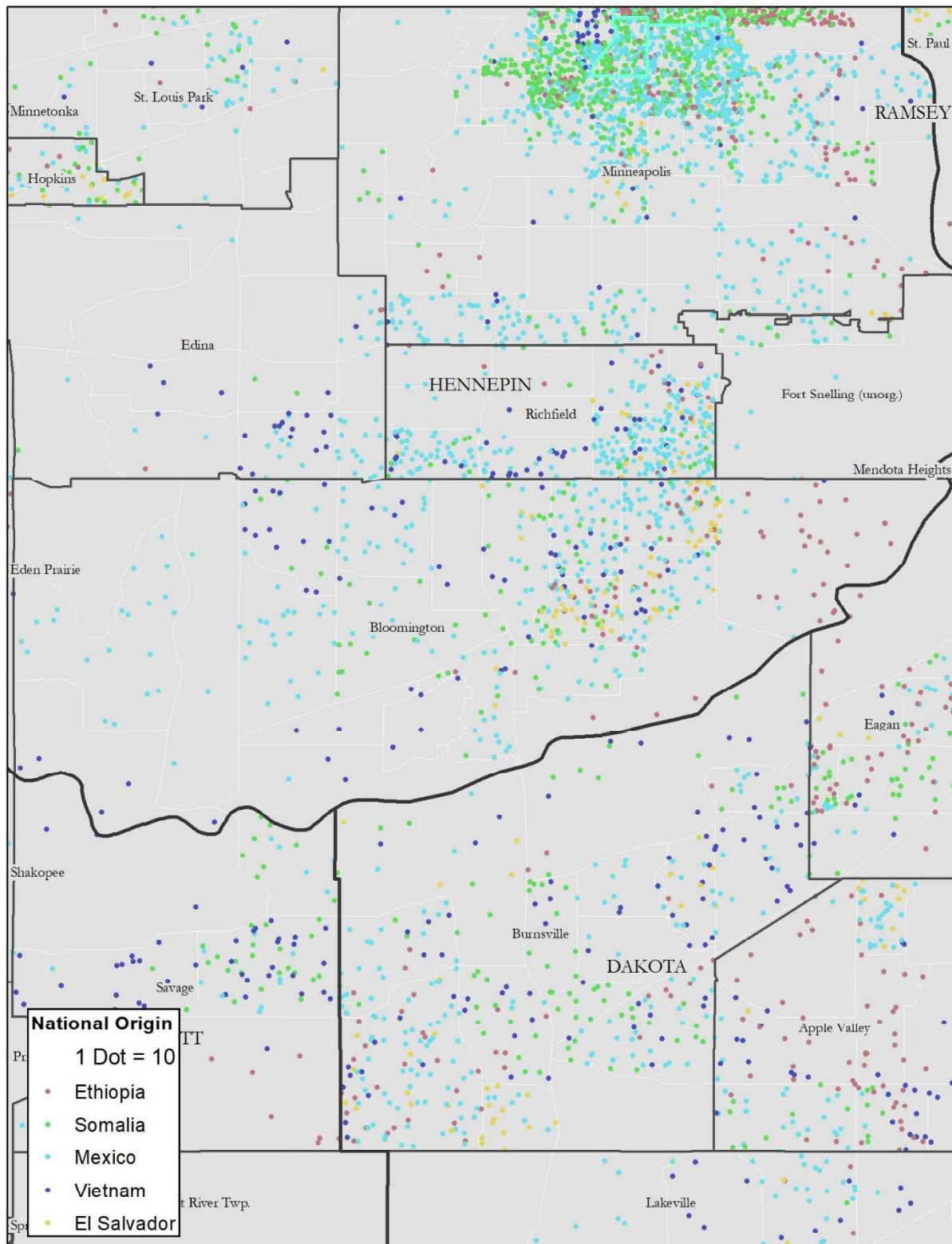
¹⁹⁶ American Community Survey Estimates, 2013-2017.

Map 20: National Origin, Hennepin County¹⁹⁷



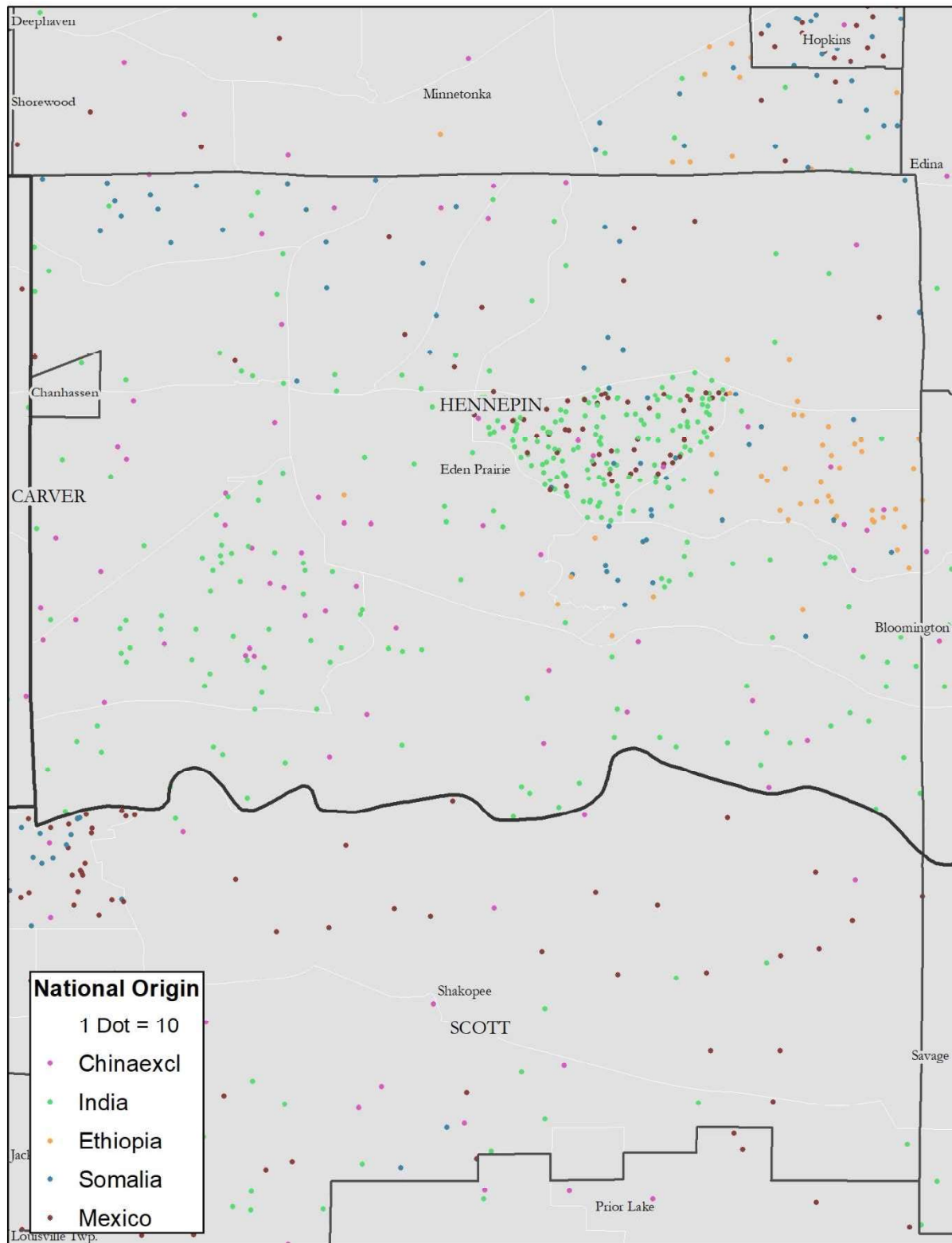
¹⁹⁷ *American Community Survey Estimates, 2013-2017.*

Map 21: National Origin, Bloomington¹⁹⁸



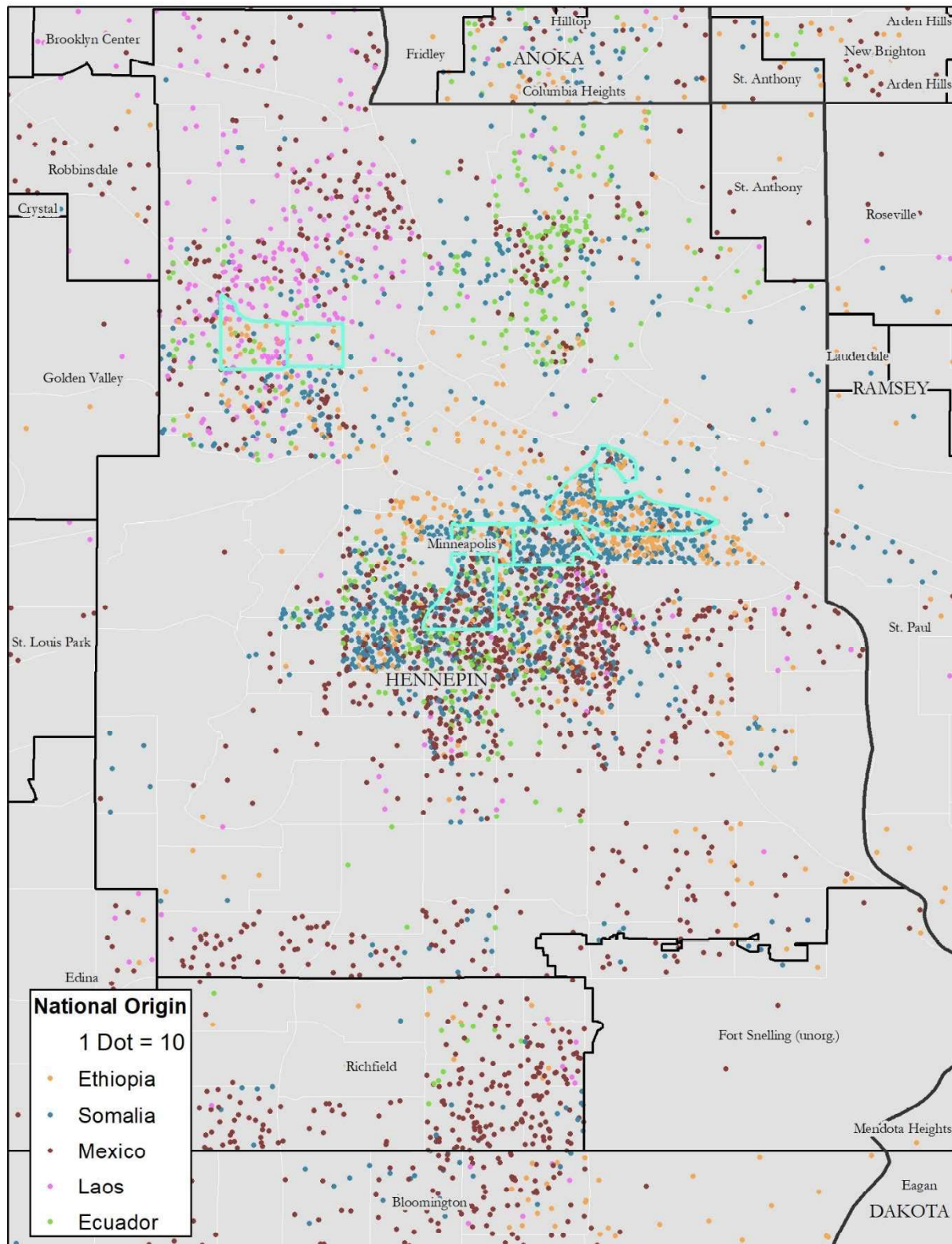
¹⁹⁸ American Community Survey Estimates, 2013-2017.

Map 22: National Origin, Eden Prairie¹⁹⁹



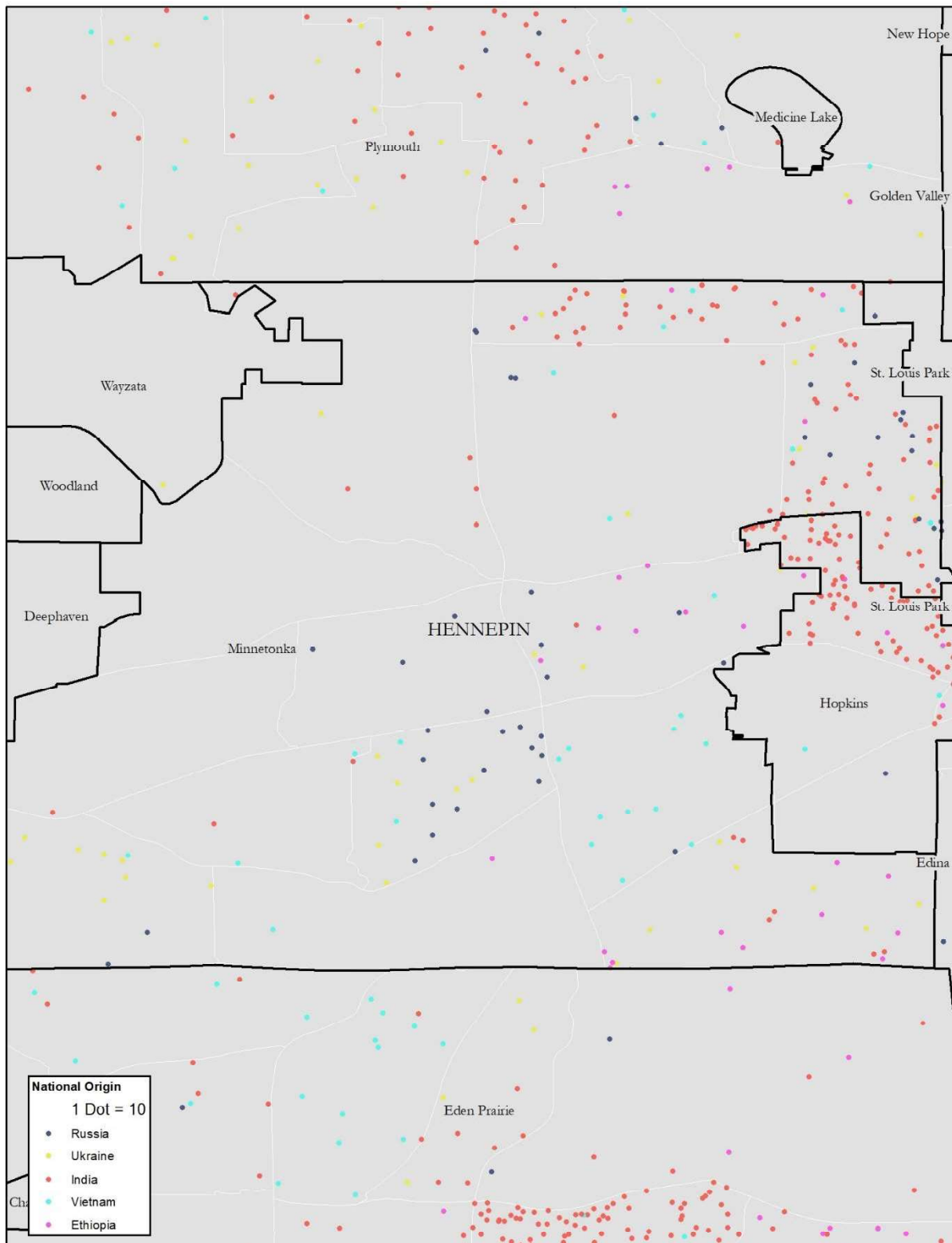
¹⁹⁹ American Community Survey Estimates, 2013-2017.

Map 23: National Origin, Minneapolis²⁰⁰



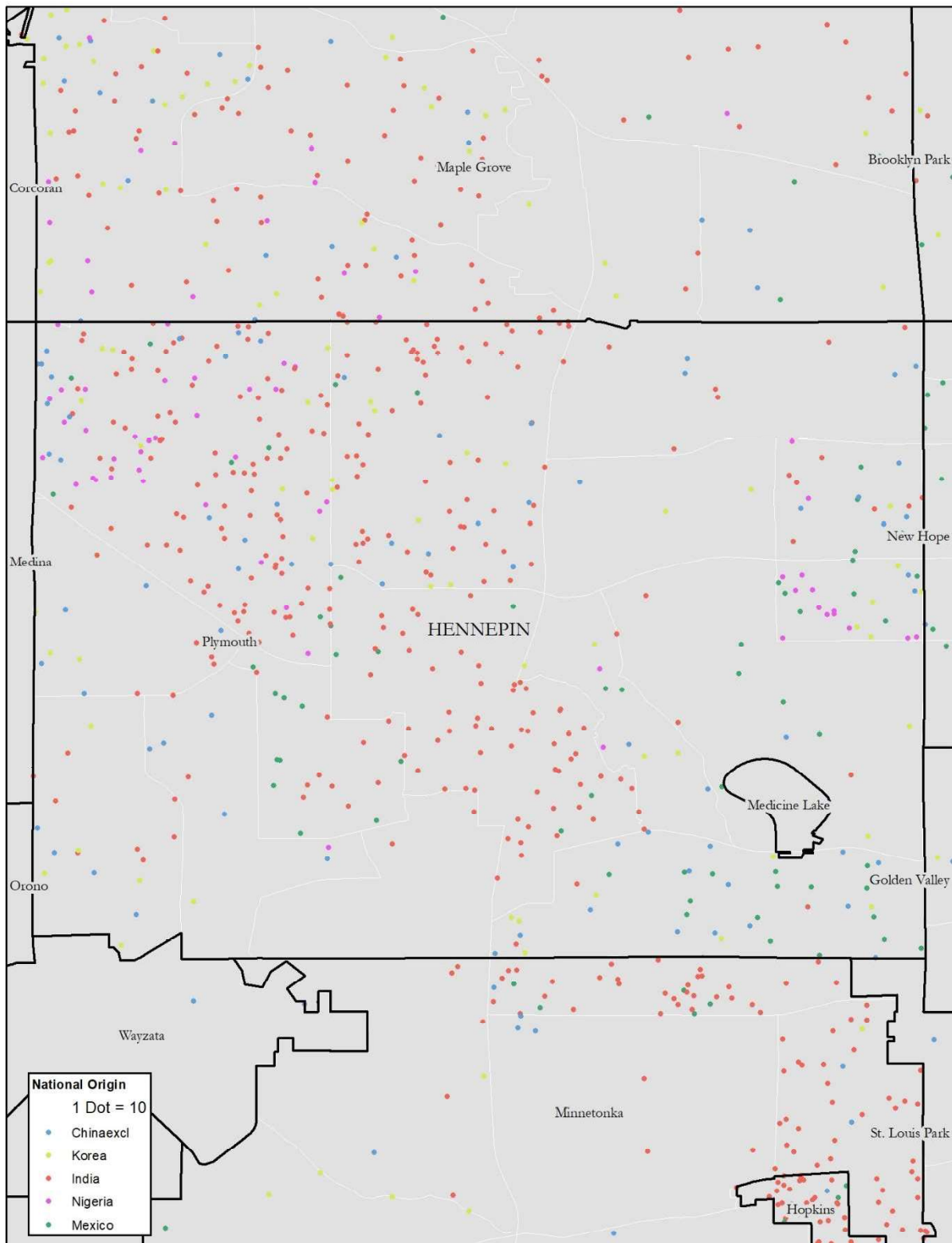
²⁰⁰ American Community Survey Estimates, 2013-2017.

Map 24: National Origin, Minnetonka²⁰¹



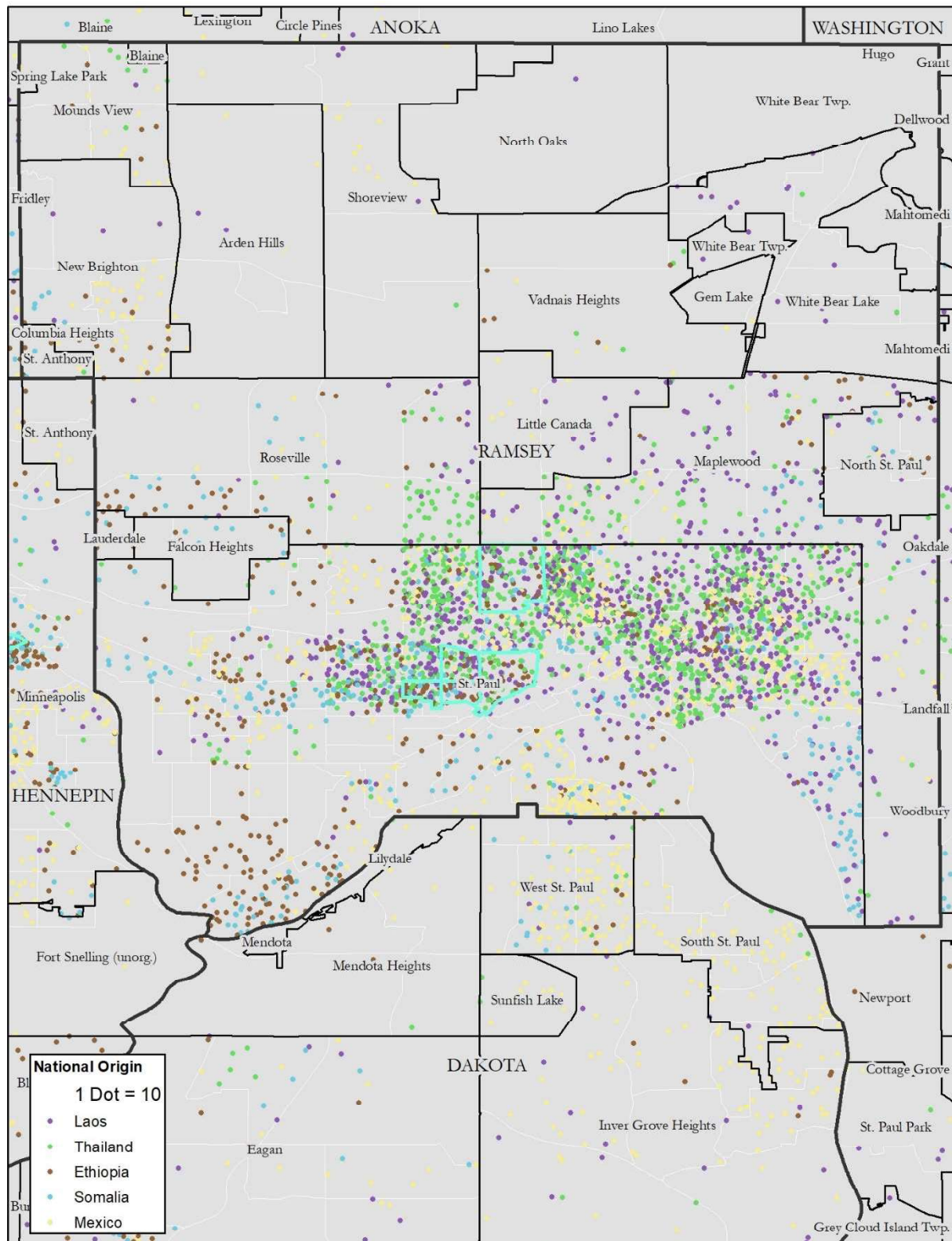
²⁰¹ American Community Survey Estimates, 2013-2017.

Map 25: National Origin, Plymouth²⁰²



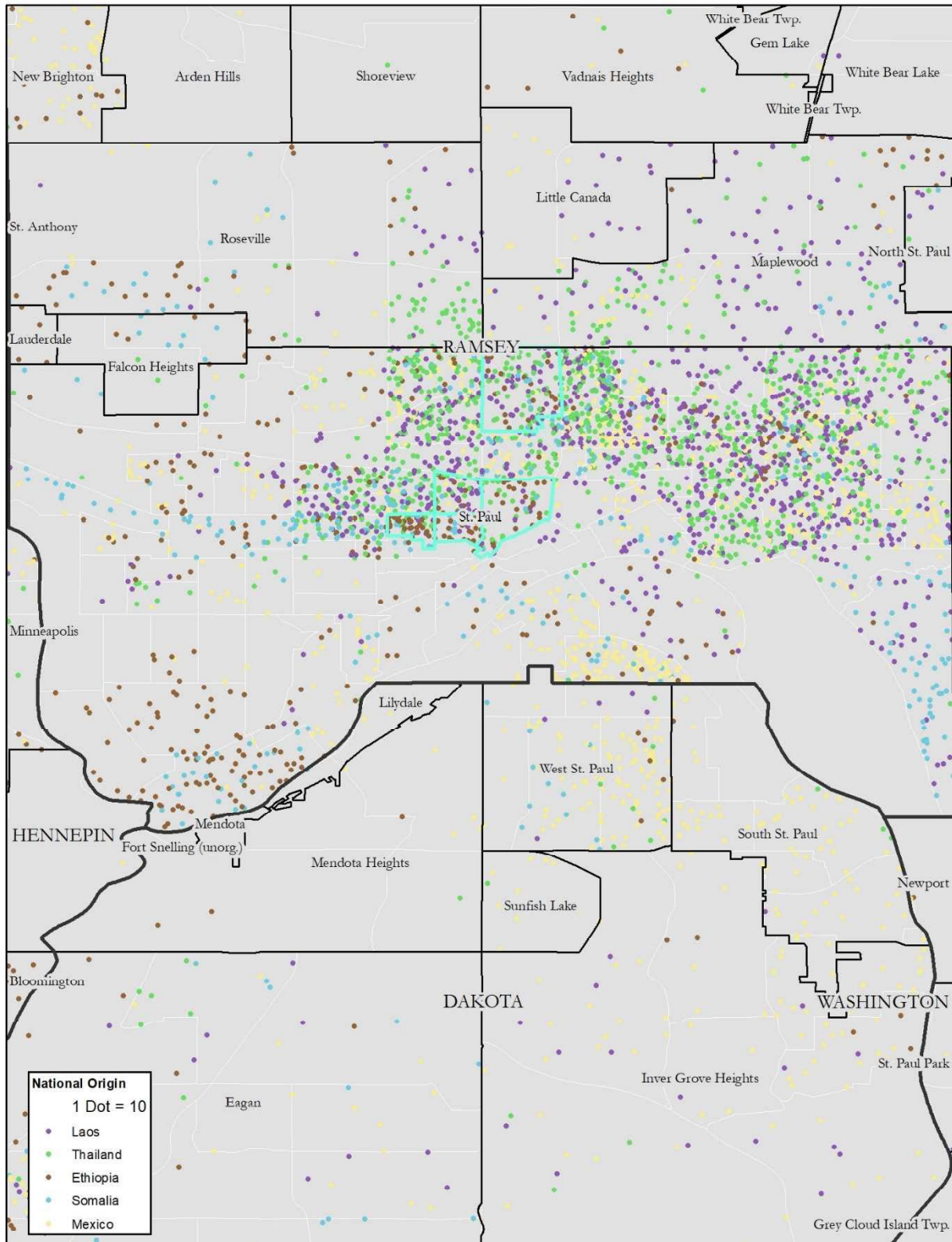
²⁰² American Community Survey Estimates, 2013-2017.

Map 26: National Origin, Ramsey County²⁰³



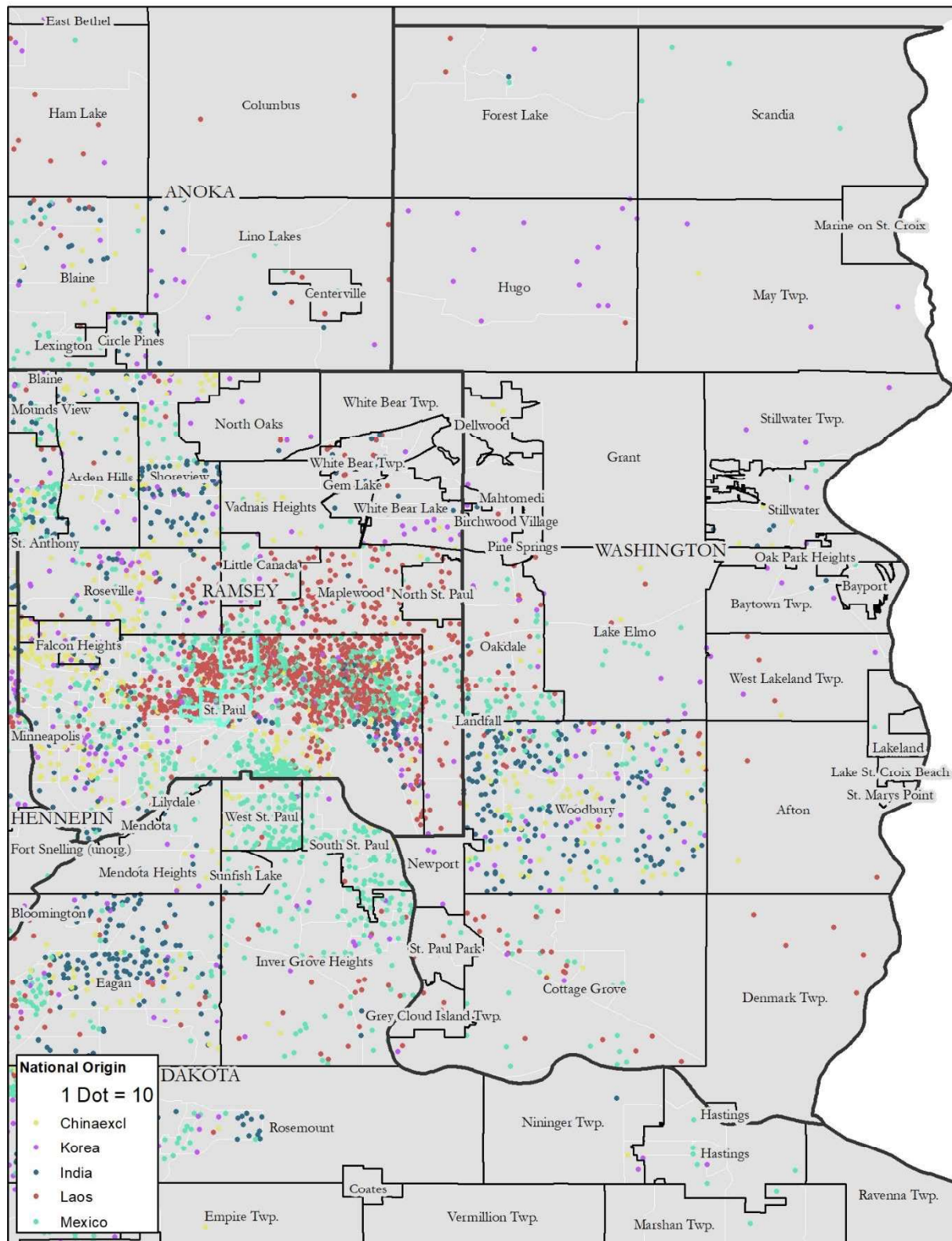
²⁰³ American Community Survey Estimates, 2013-2017.

Map 27: National Origin, St. Paul²⁰⁴



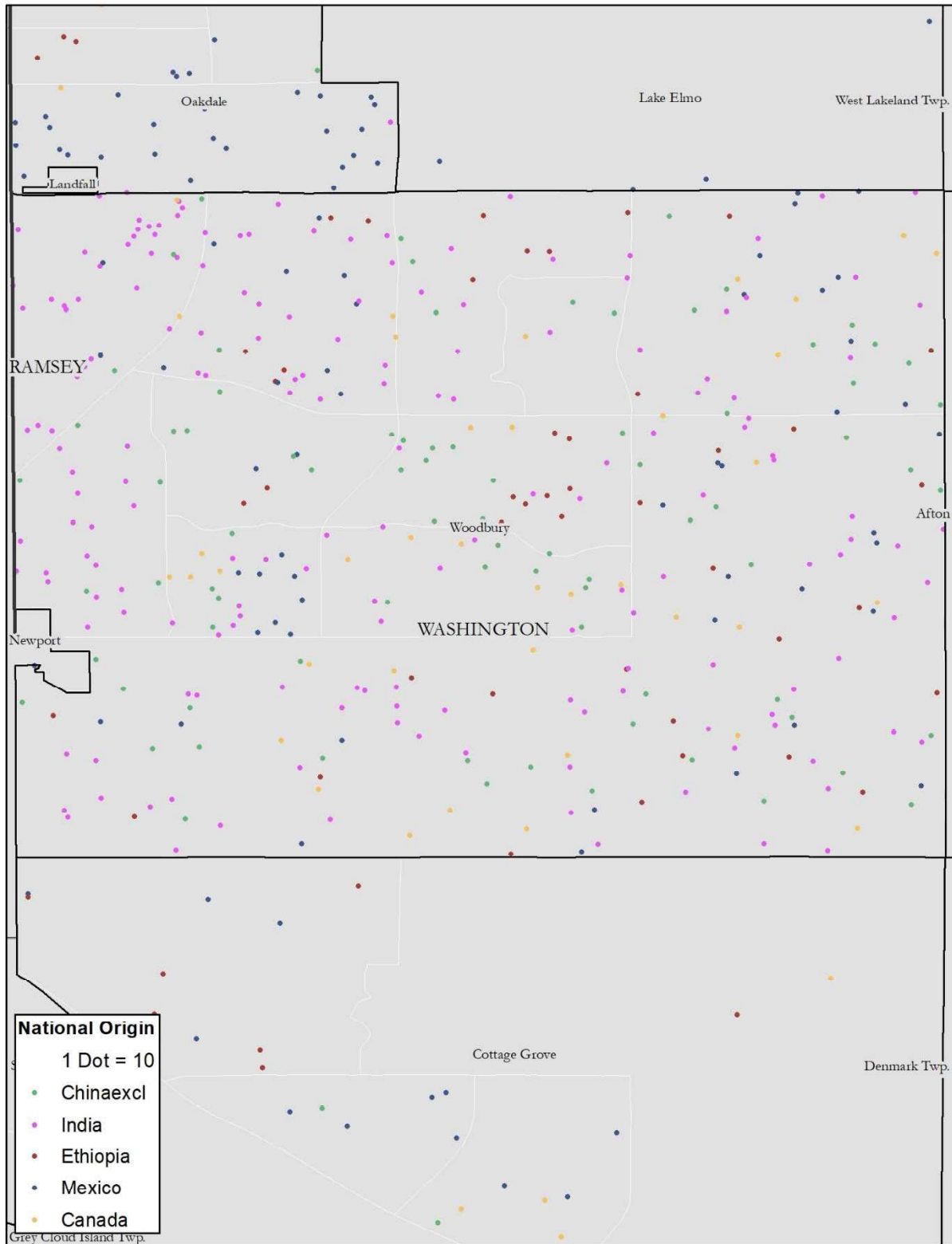
²⁰⁴ American Community Survey Estimates, 2013-2017.

Map 28: National Origin, Washington County²⁰⁵



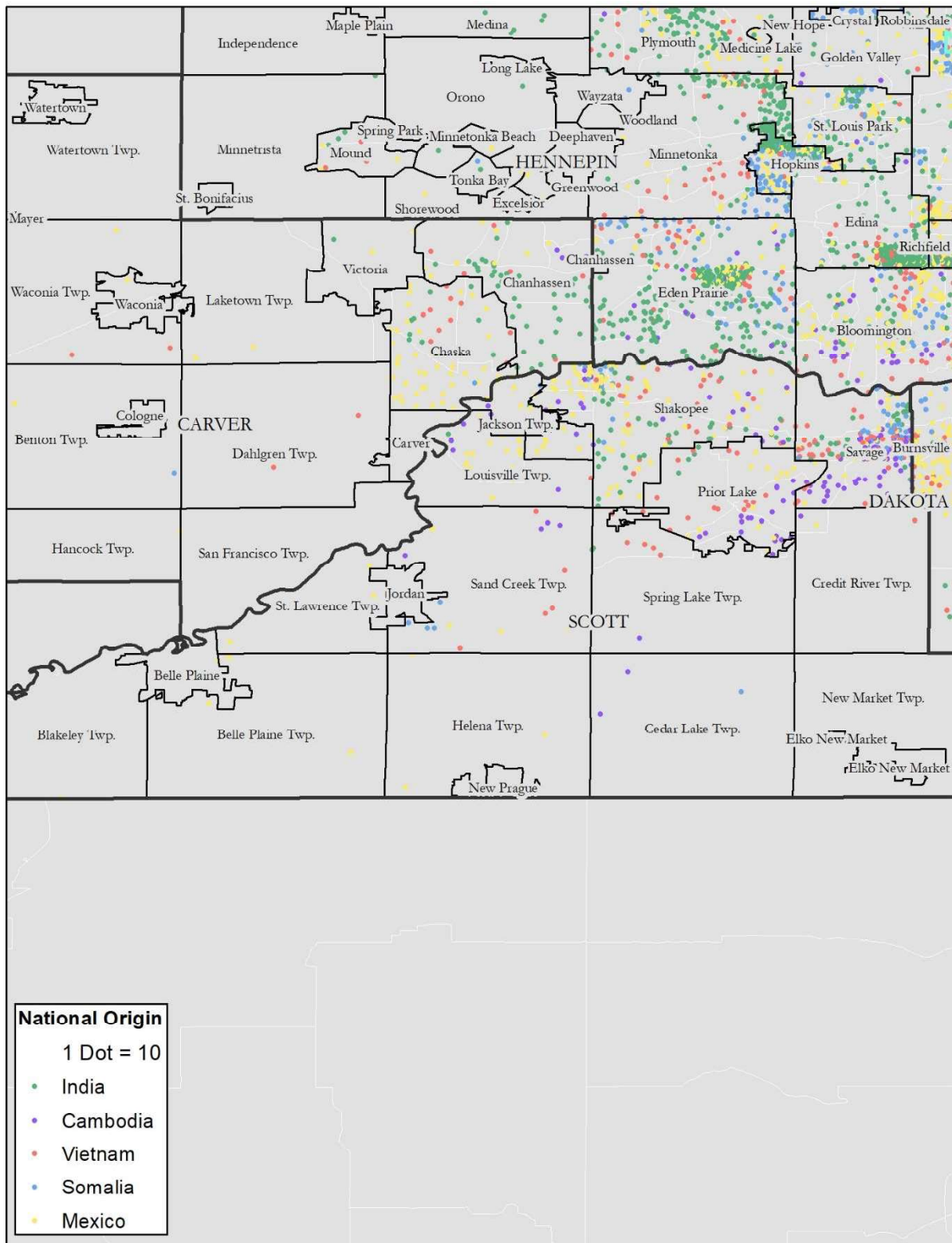
²⁰⁵ American Community Survey Estimates, 2013-2017.

Map 29: National Origin, Woodbury²⁰⁶



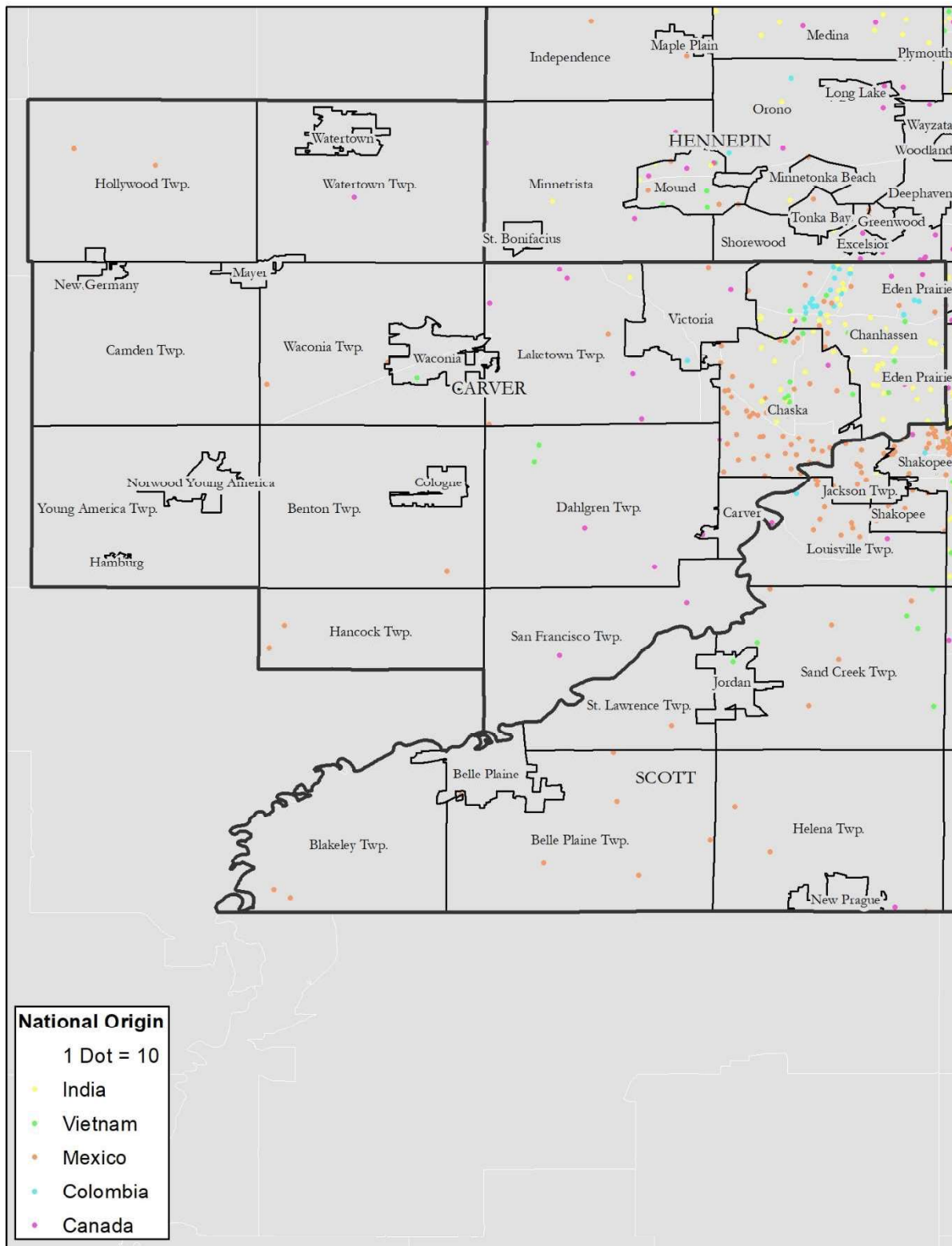
²⁰⁶ American Community Survey Estimates, 2013-2017.

Map 30: National Origin, Scott County²⁰⁷



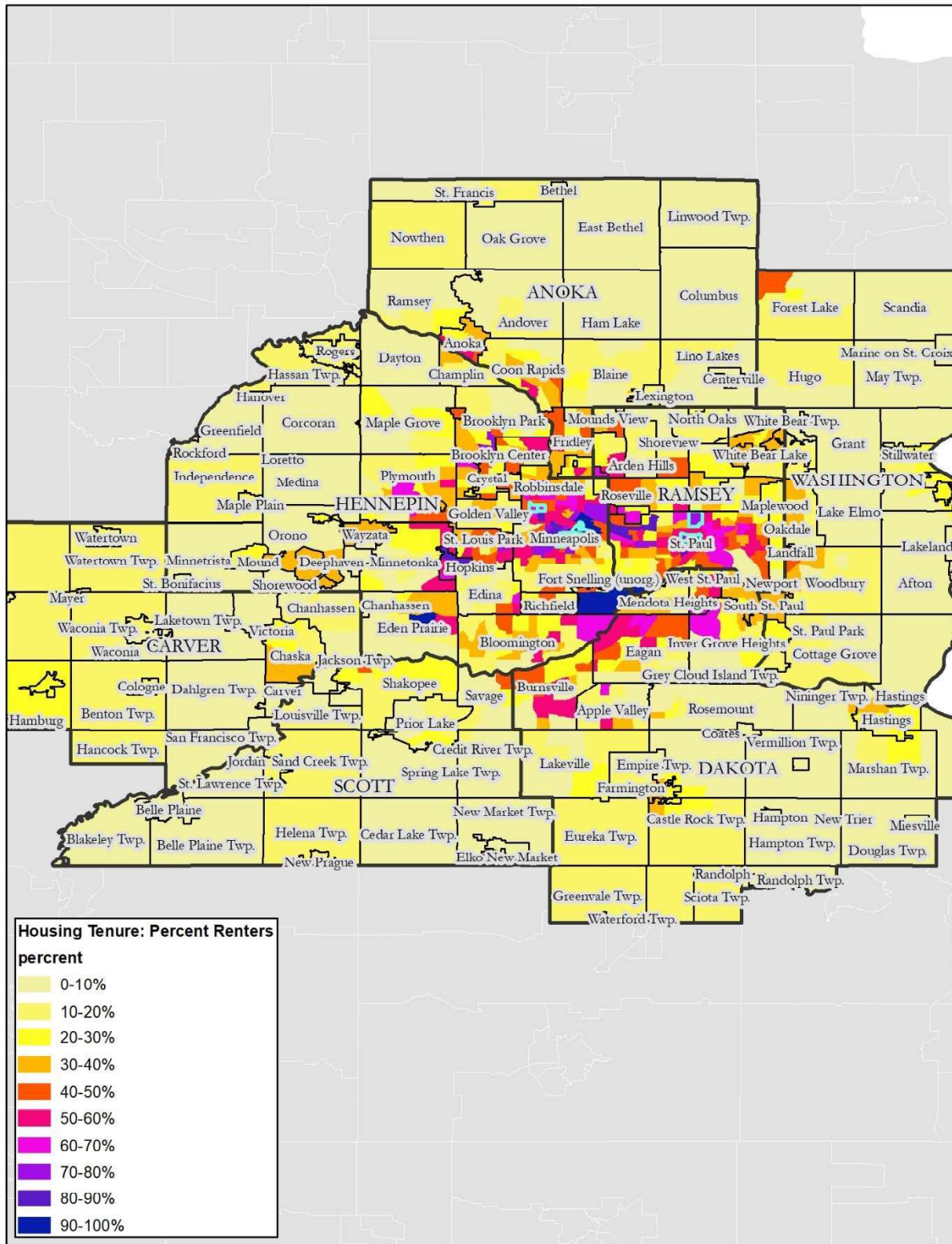
²⁰⁷ American Community Survey Estimates, 2013-2017.

Map 31: National Origin, Carver County²⁰⁸



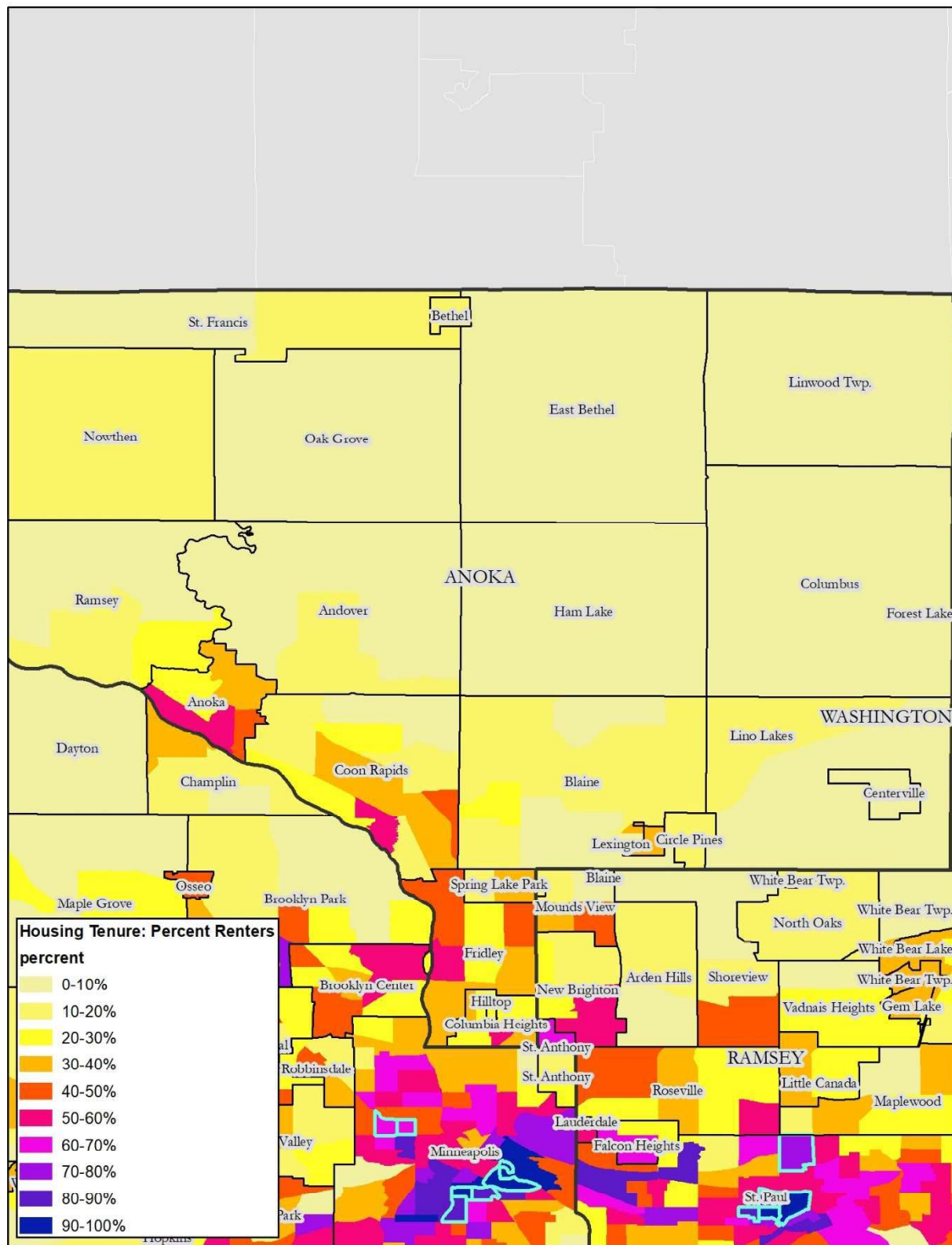
²⁰⁸ American Community Survey Estimates, 2013-2017.

Map 32: Housing Tenure, Region²⁰⁹



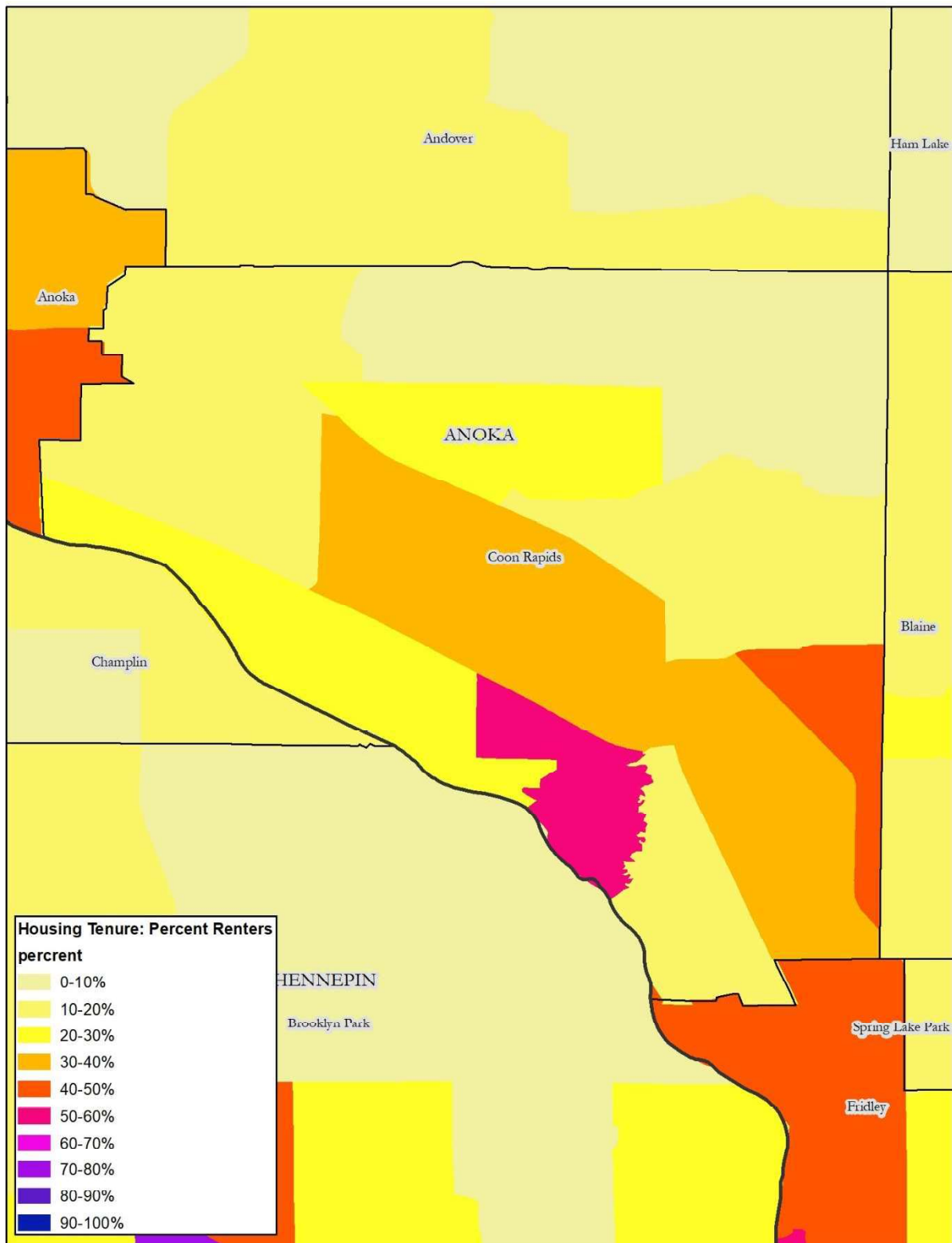
²⁰⁹ American Community Survey Estimates, 2013-2017.

Map 33: Housing Tenure, Anoka County²¹⁰



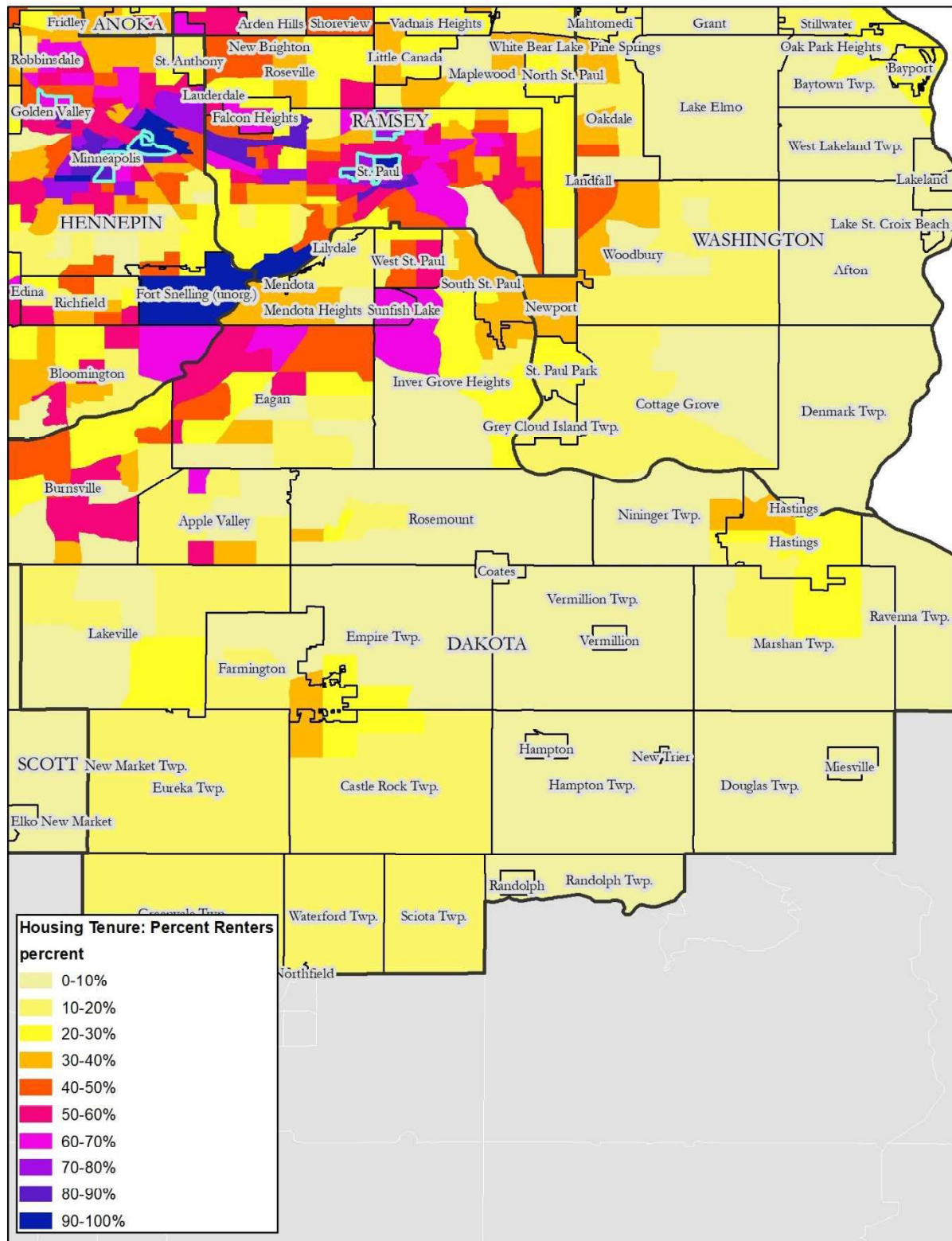
²¹⁰ American Community Survey Estimates, 2013-2017.

Map 34: Housing Tenure, Coon Rapids²¹¹



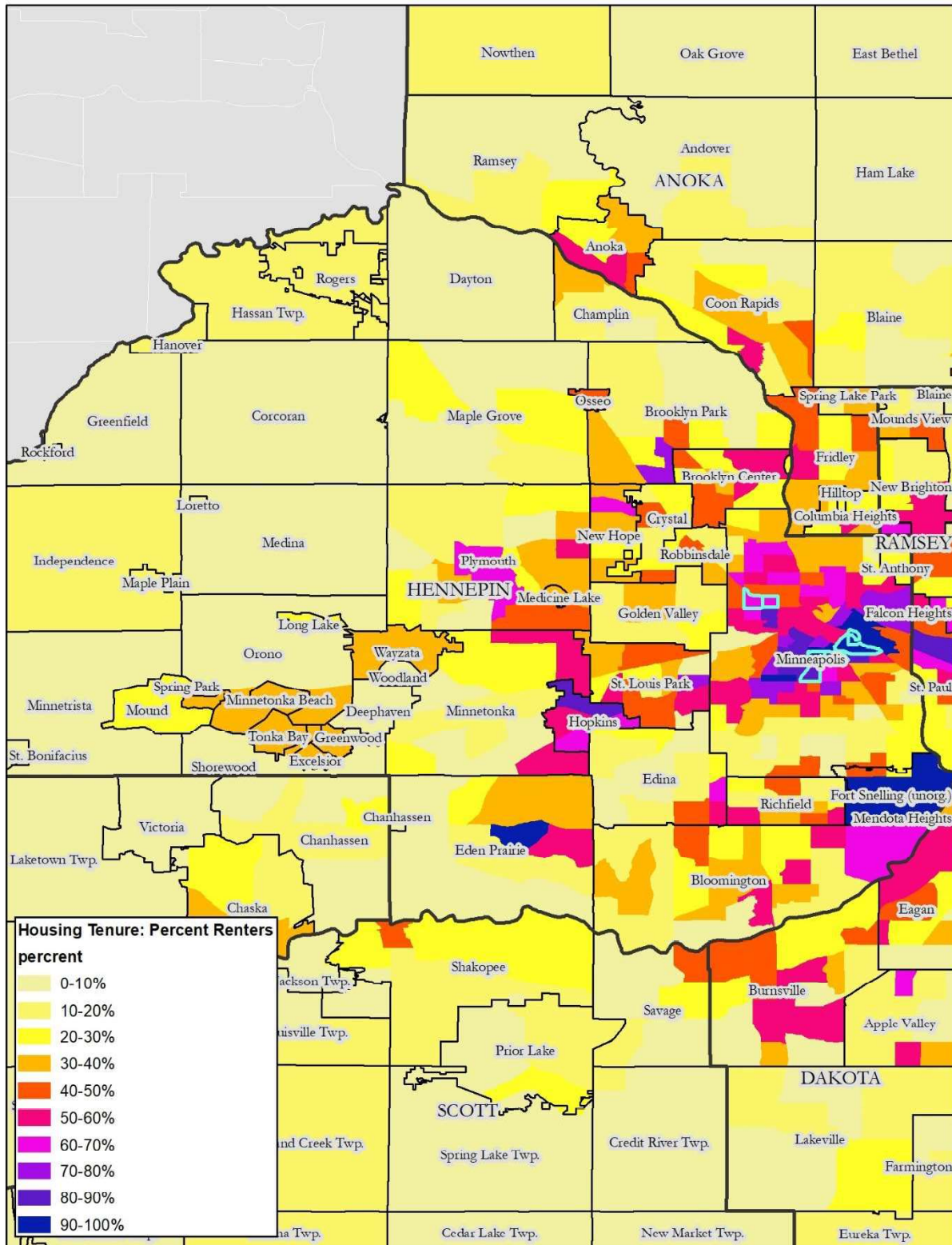
²¹¹ American Community Survey Estimates, 2013-2017.

Map 35: Housing Tenure, Dakota County²¹²



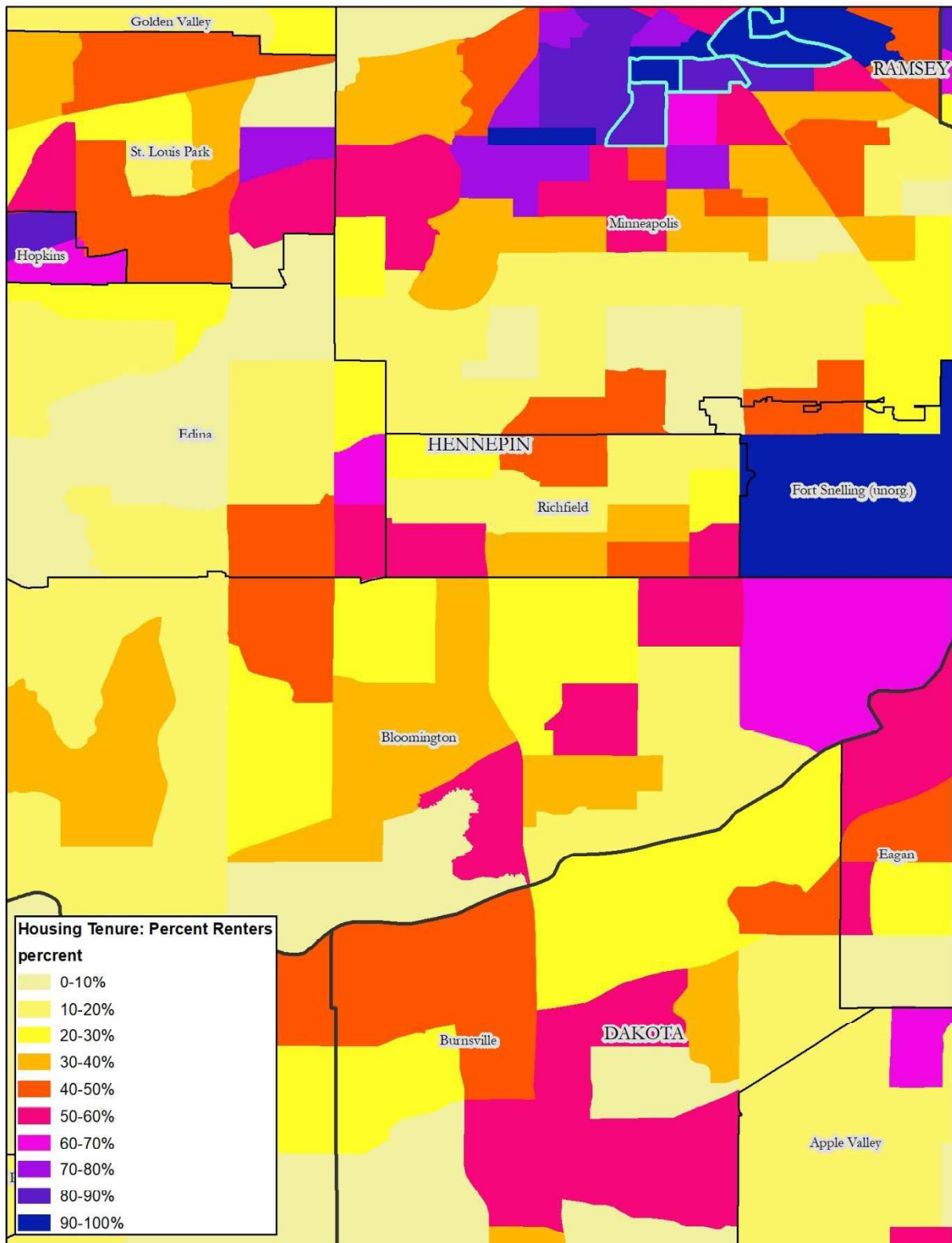
²¹² American Community Survey Estimates, 2013-2017.

Map 36: Housing Tenure, Hennepin County²¹³



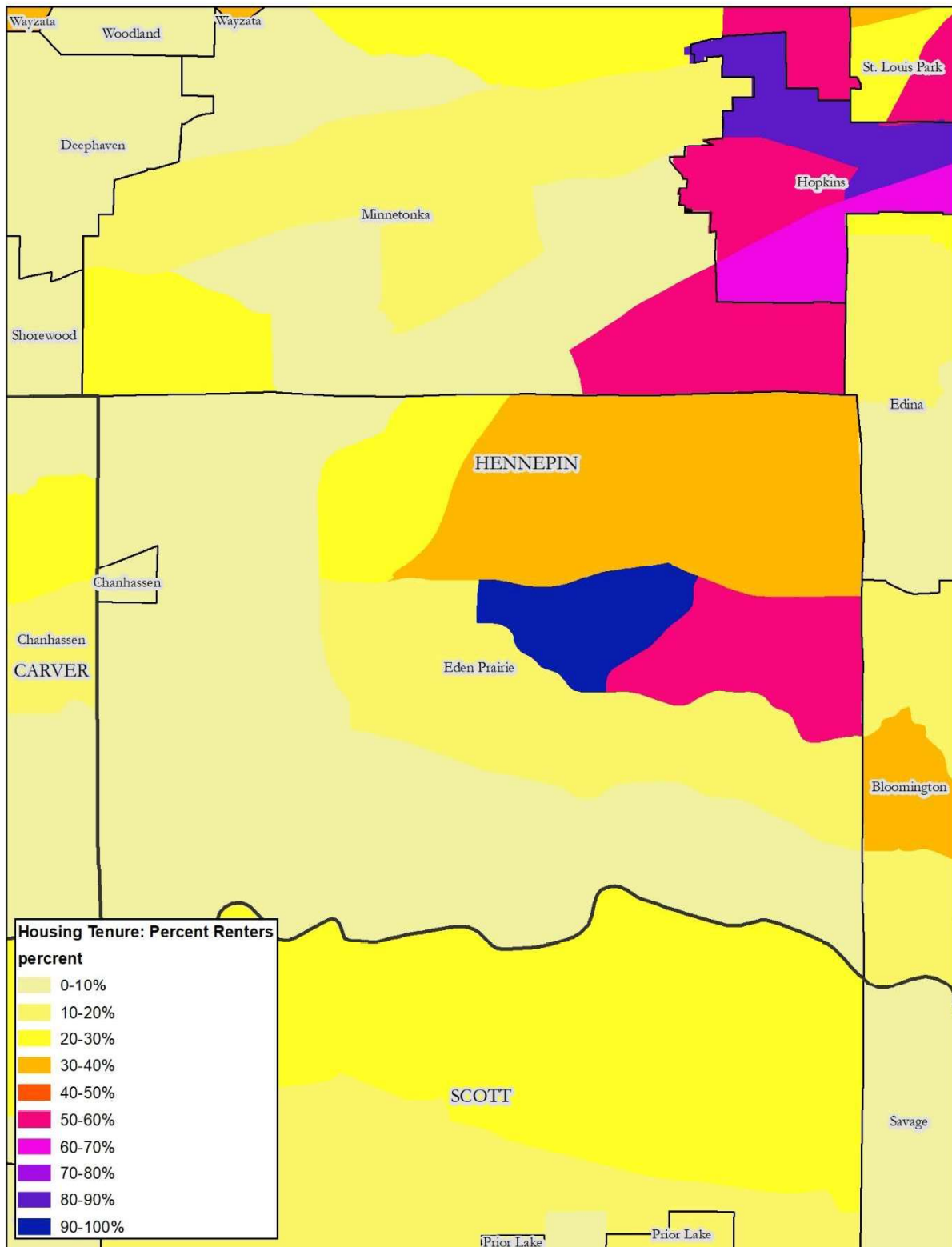
²¹³ American Community Survey Estimates, 2013-2017.

Map 37: Housing Tenure, Bloomington²¹⁴



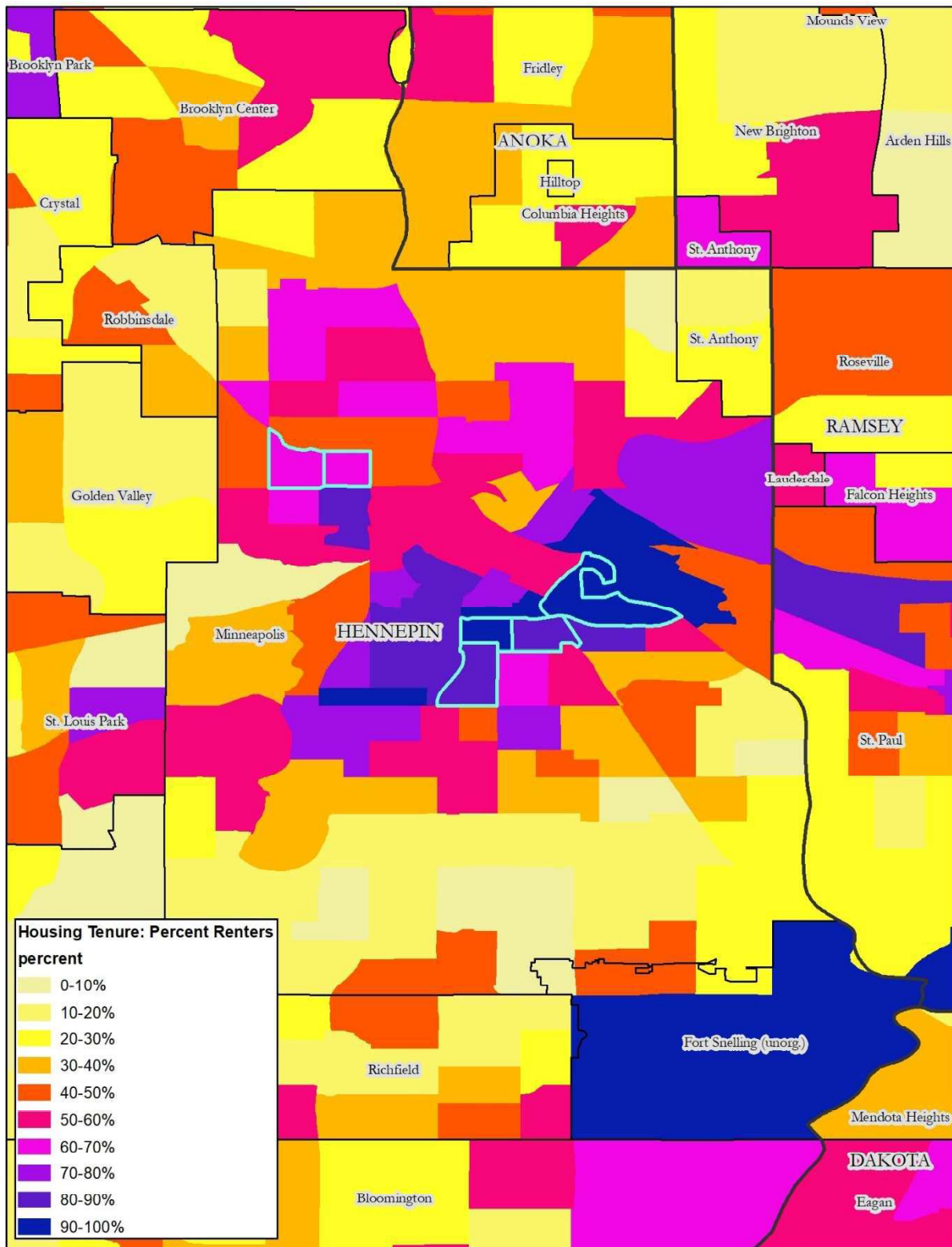
²¹⁴ American Community Survey Estimates, 2013-2017.

Map 38: Housing Tenure, Eden Prairie²¹⁵



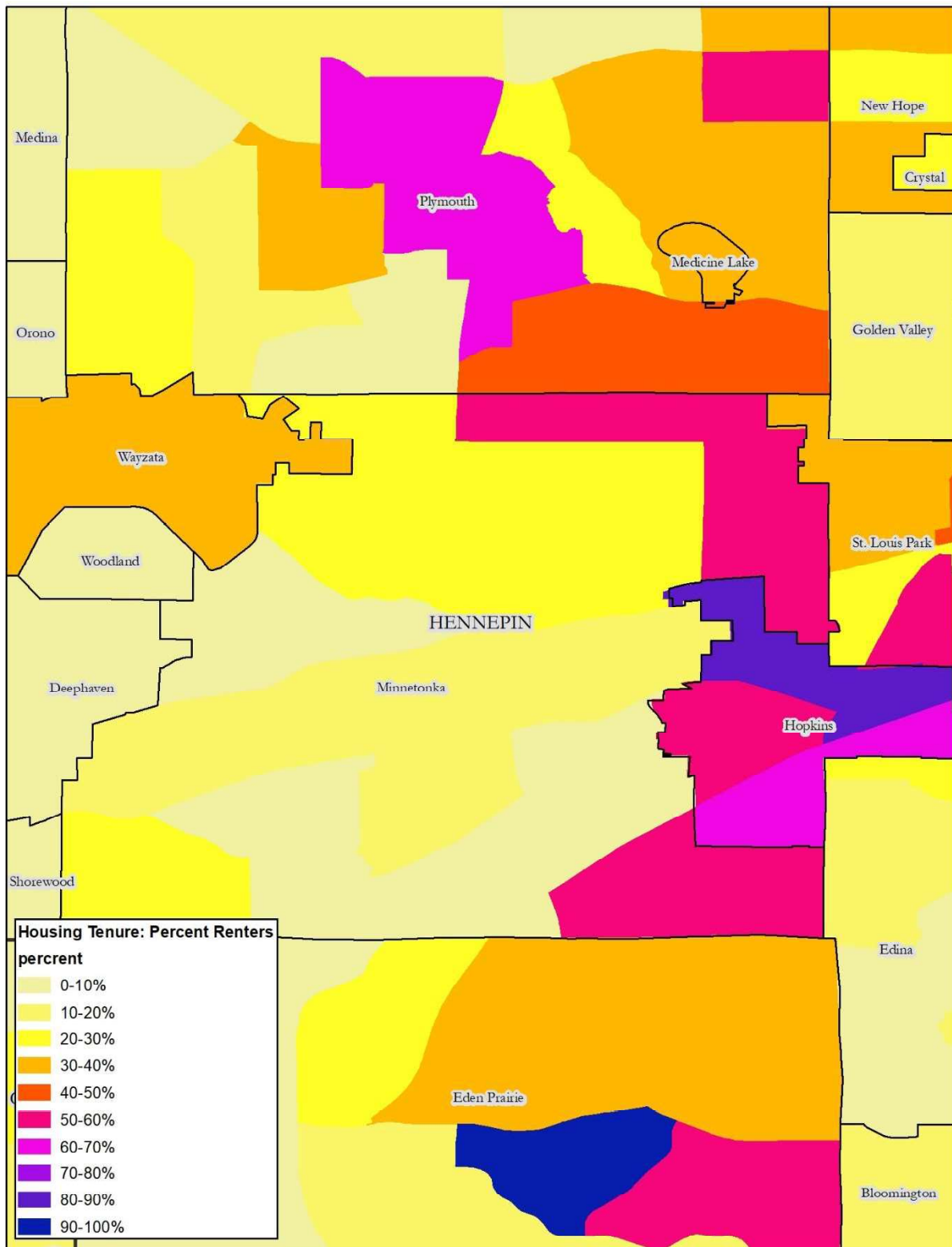
²¹⁵ American Community Survey Estimates, 2013-2017.

Map 39: Housing Tenure, Minneapolis²¹⁶



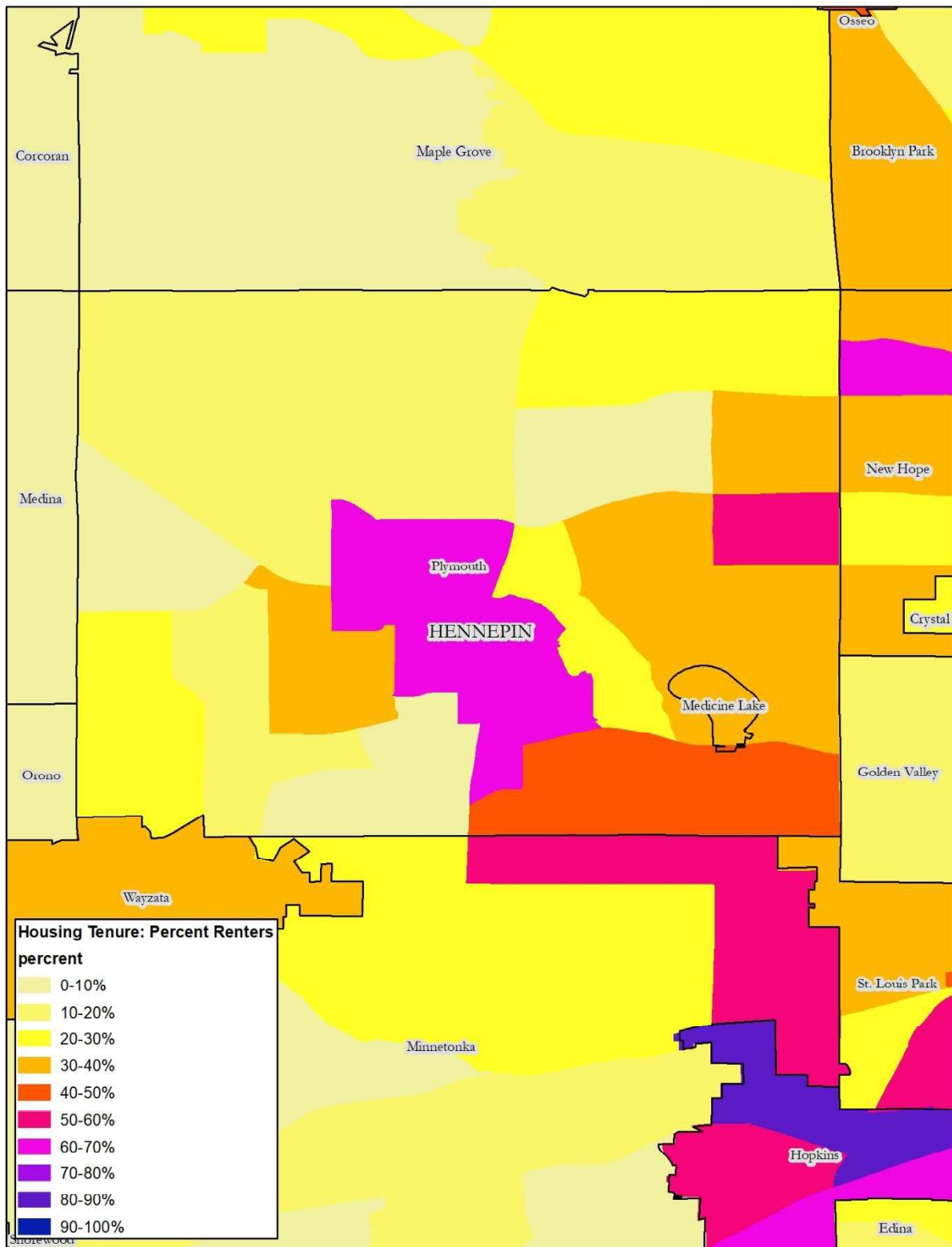
²¹⁶ American Community Survey Estimates, 2013-2017.

Map 40: Housing Tenure, Minnetonka²¹⁷



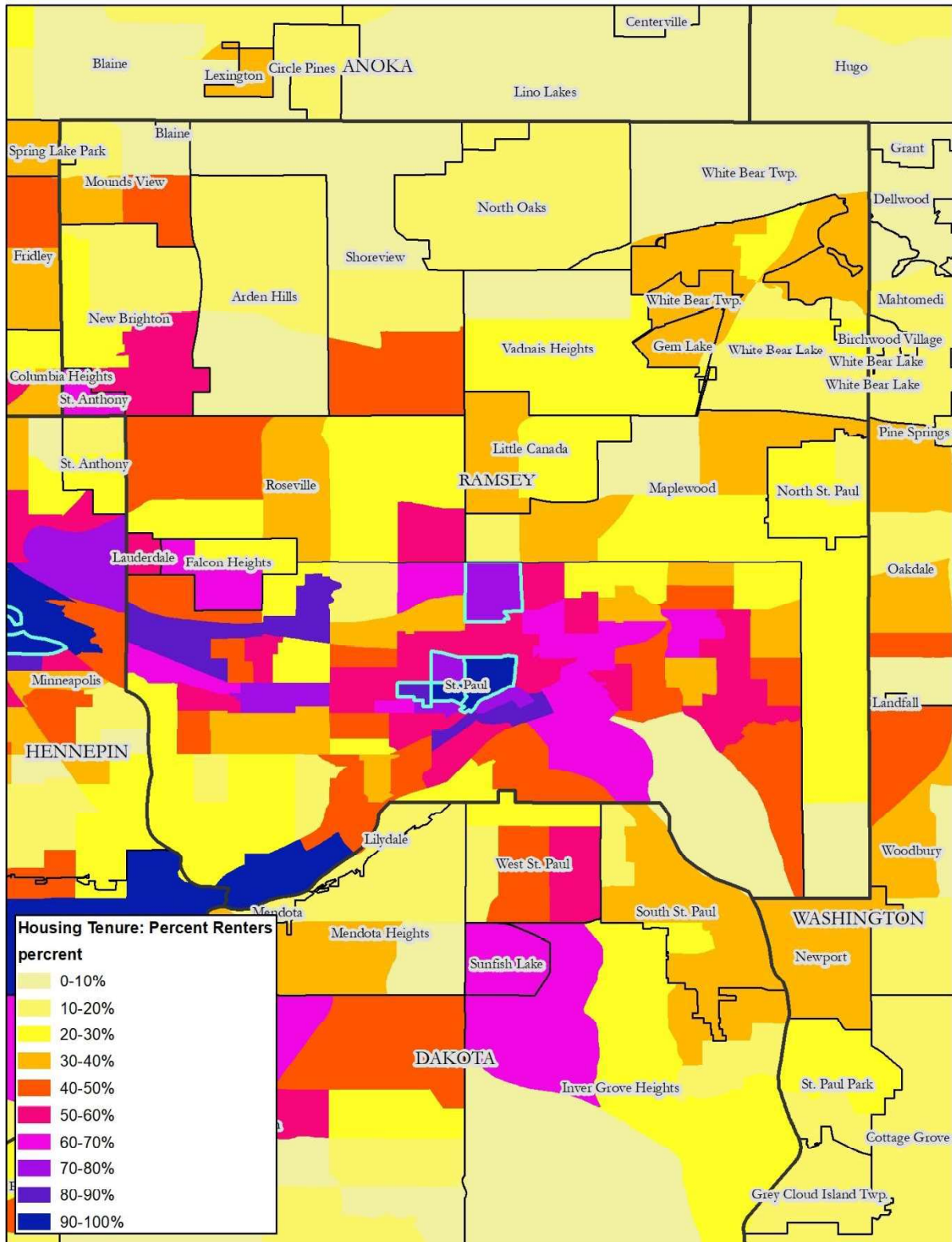
²¹⁷ American Community Survey Estimates, 2013-2017.

Map 41: Housing Tenure, Plymouth²¹⁸



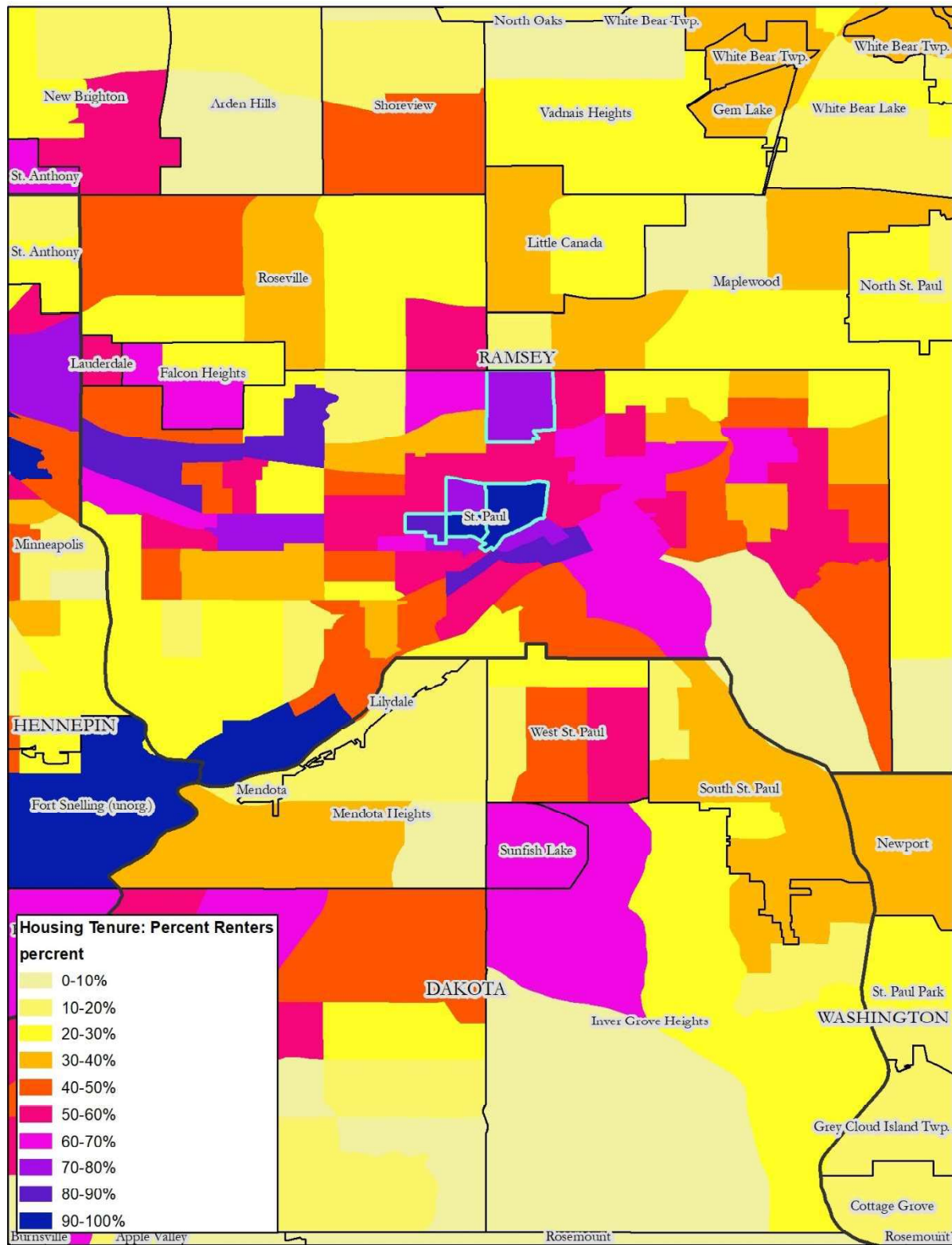
²¹⁸ American Community Survey Estimates, 2013-2017.

Map 42: Housing Tenure, Ramsey County²¹⁹



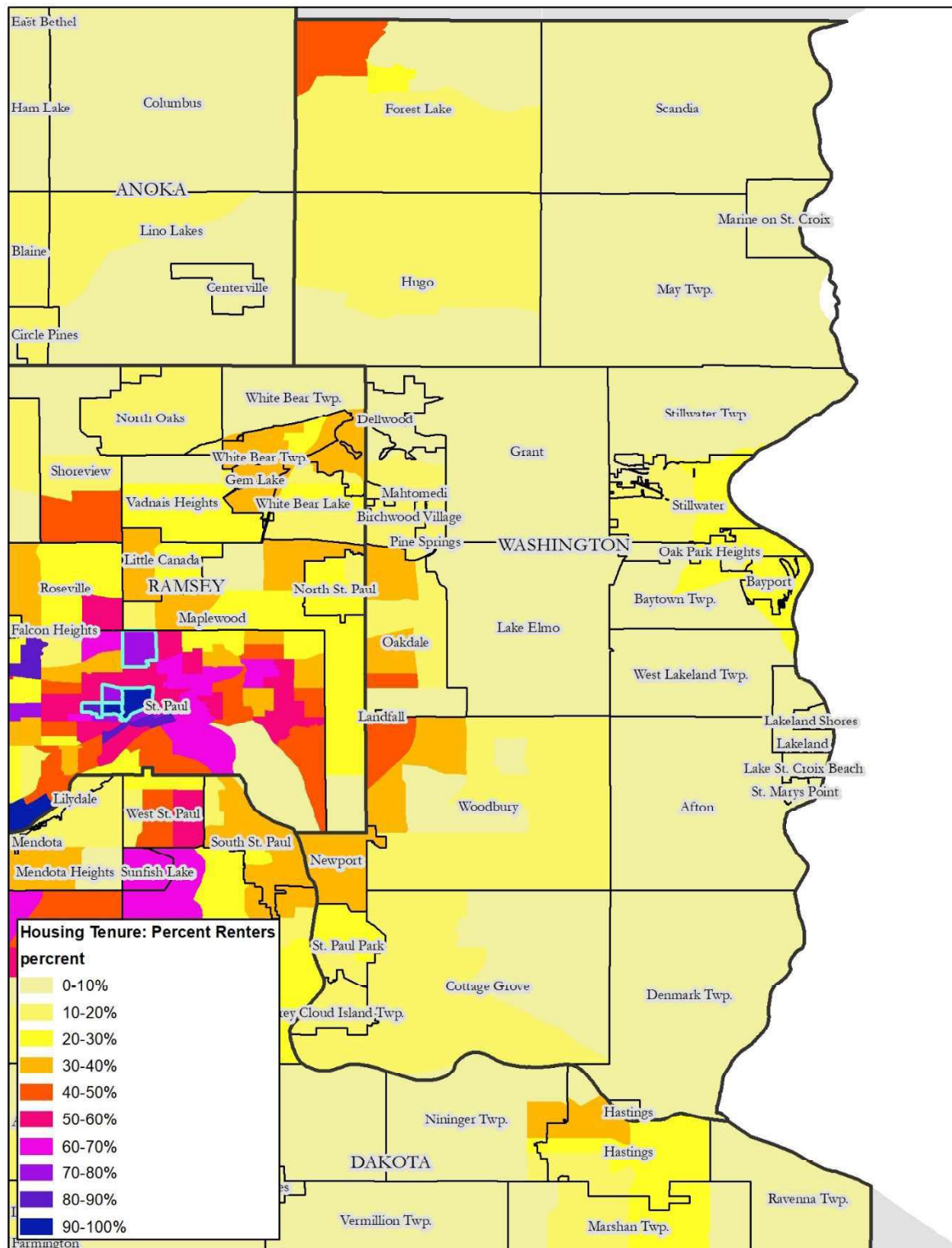
²¹⁹ American Community Survey Estimates, 2013-2017.

Map 43: Housing Tenure, St. Paul²²⁰



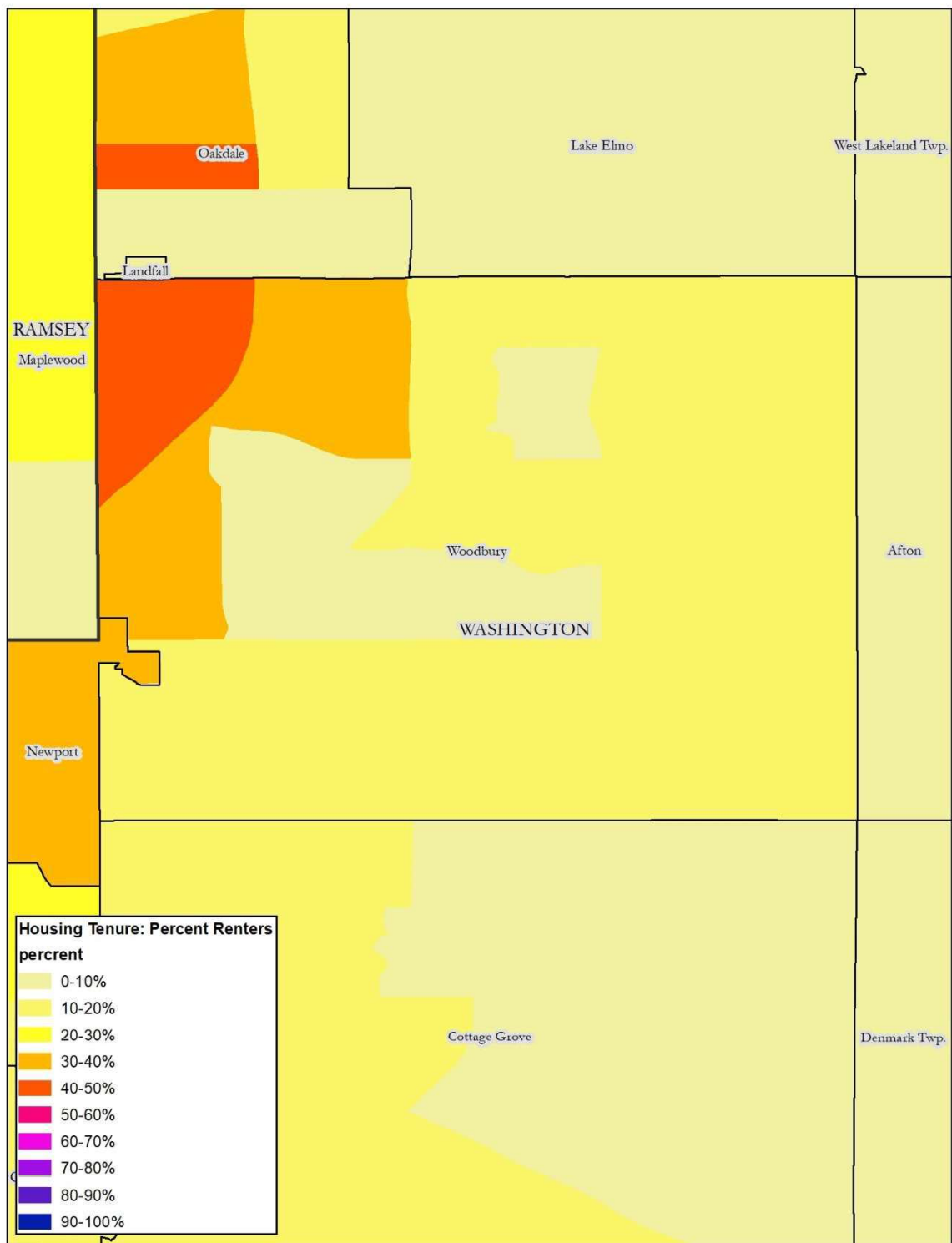
²²⁰ American Community Survey Estimates, 2013-2017.

Map 44: Housing Tenure, Washington County²²¹



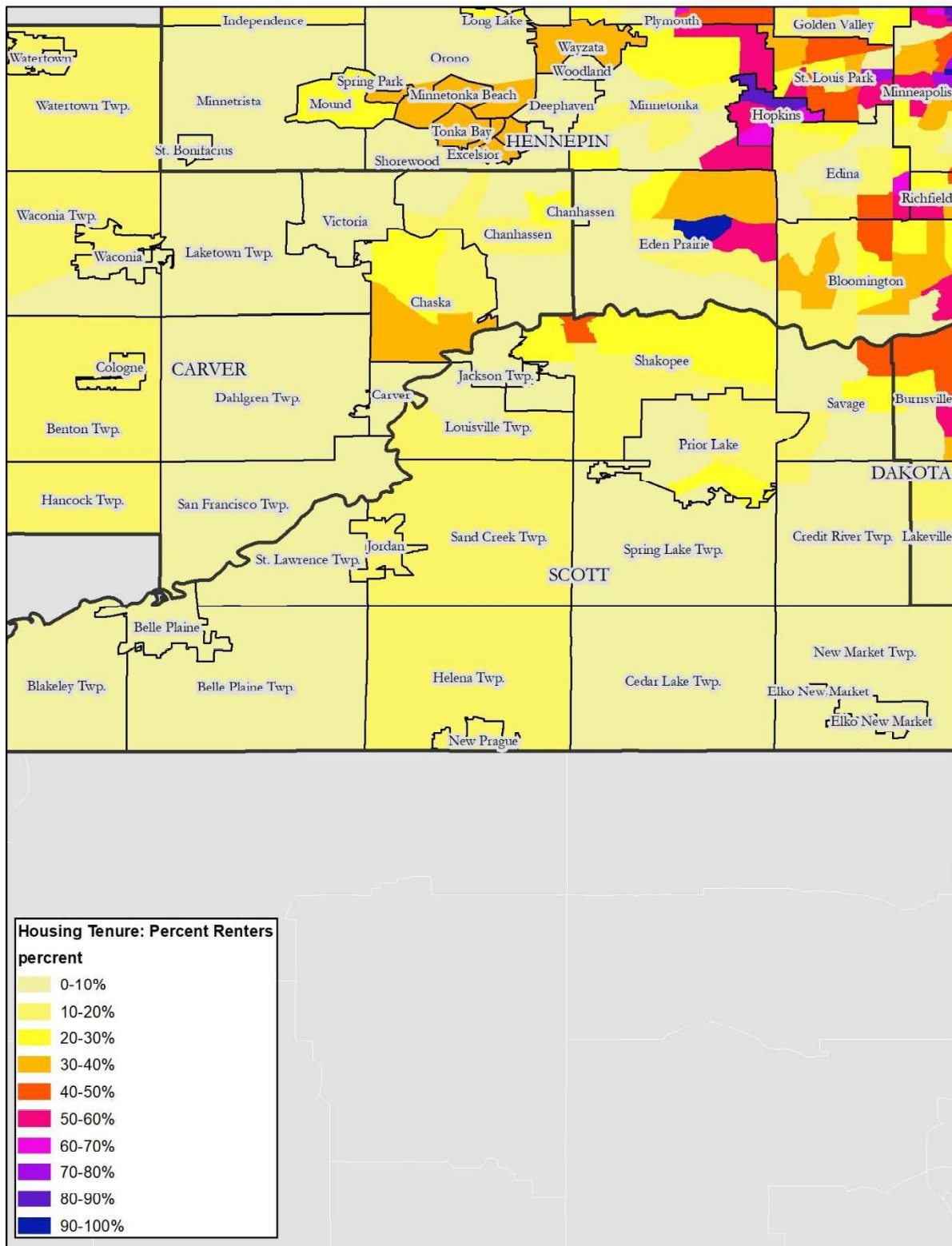
²²¹ American Community Survey Estimates, 2013-2017.

Map 45: Housing Tenure, Woodbury²²²



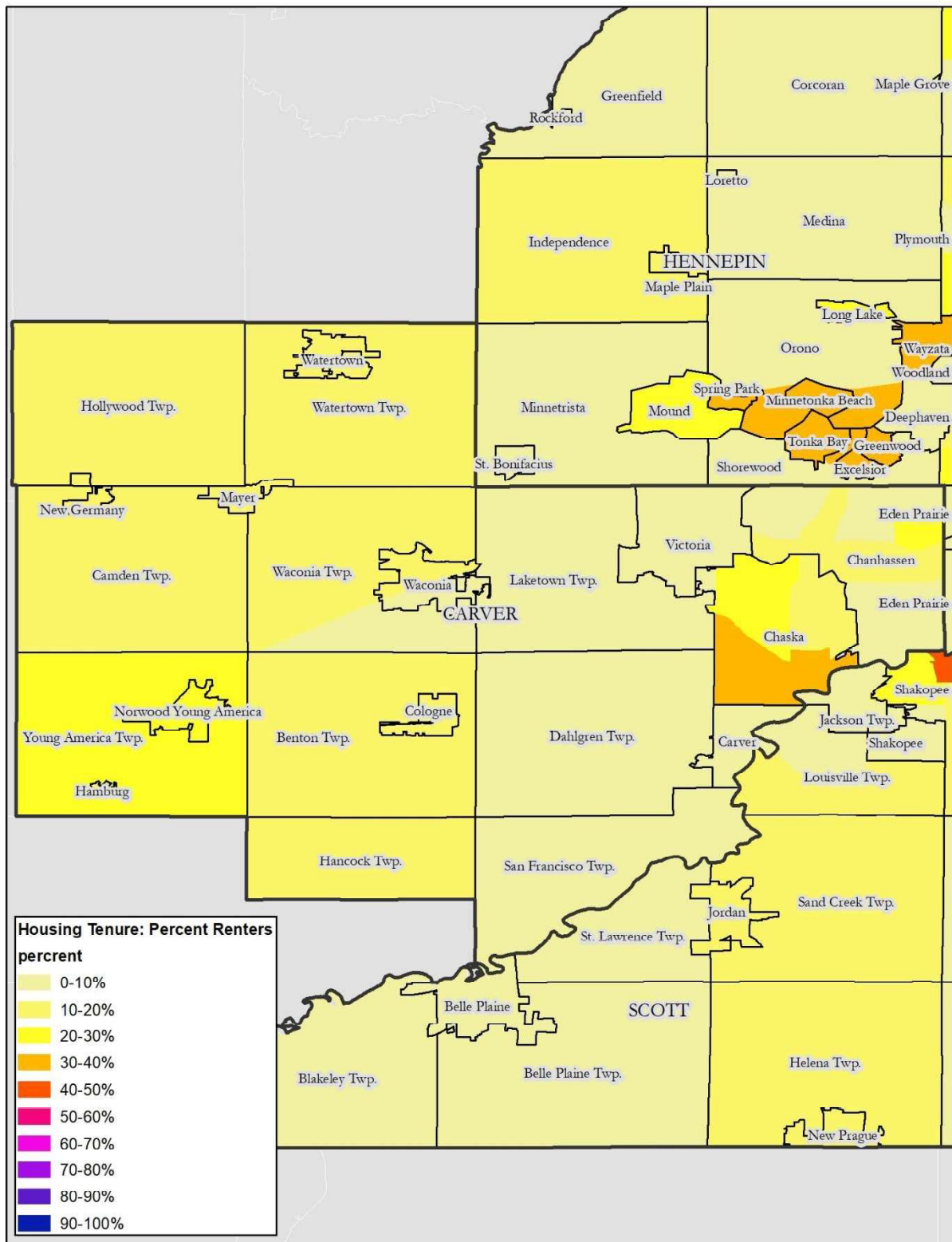
²²² American Community Survey Estimates, 2013-2017.

Map 46: Housing Tenure, Scott County²²³



²²³ American Community Survey Estimates, 2013-2017.

Map 47: Housing Tenure, Carver County²²⁴



²²⁴ American Community Survey Estimates, 2013-2017.