



# Fair Housing Work Group

Status update and policy and program options in response to Resolution 17-2064.

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# Executive Summary

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This report is in response to the City Council Resolution 17-2064 directing staff of the Fair Housing Workgroup to develop a Fair Housing Strategic Plan to present to the City Council on March 28, 2018.

Fair housing is the right to choose housing free from unlawful discrimination. When housing choice is limited, a resident's access to place-based assets like schools, employment, parks, and other infrastructure may also be limited. Government entities receiving U.S. Department of Housing and Urban Development (HUD) funds are required to understand the current fair housing landscape and implement strategies to overcome obstacles preventing the realization of full fair housing in our community.

In 2015, the cities of Minneapolis and Saint Paul were named in a fair housing complaint (now resolved) alleging the analysis and findings of their HUD-required Analysis of Impediments were deficient. In 2016, the cities entered into a Voluntary Compliance Agreement with HUD which required the preparation of an Analysis of Impediments Addendum to provide a more robust analysis focusing on segregation and integration, areas of concentrated poverty and areas of opportunity. In 2017, Saint Paul City Council and Mayor Christopher Coleman directed the creation of a Fair Housing Workgroup to make policy and budget recommendations to the Mayor and Housing and Redevelopment Authority with the goal of eliminating housing disparities, lowering barriers to affordable housing, and ensuring access to economic opportunity in the City of Saint Paul.

This report includes:

- background on the City of Saint Paul's role in Fair Housing;
- data about the current state of Fair Housing in Saint Paul;
- the current status of the 11 goals outlined in Resolution 17-206;
- policy and program options for furthering Fair Housing; and
- recommended next steps for implementation.

The Fair Housing Work Group recognizes that advancing a broad vision for fair housing requires a comprehensive, long-term approach that aligns and integrates our resources as a City across a full continuum from homelessness to homeownership. And, the Work Group recognizes that some Saint Paul residents are in crisis today, requiring shorter-term policy and program activities. The goal of the policy, program, and infrastructure options outlined in this section are therefore twofold:

- **to provide a roadmap to advance the 11 specific fair housing goals named in the resolution; and,**
- **to set the stage for a comprehensive fair housing strategic planning process informed by robust community engagement.**

Through the work outlined in this report, the Fair Housing Workgroup arrived at the following program and policy options to advance the 11 fair housing goals identified in the Council resolution. The options are organized into three community impact areas: 1) Preservation and Production of Affordable Housing; 2) Displacement Prevention; and 3) Enforcement and Education.

To ensure that fair housing efforts are sustained, coordinated, and equitable the Work Group identified a group of options for infrastructure to support fair housing implementation, including the development of cross-functional work groups to identify and implement priorities in each of the three community impact areas, broadening the Work Group to include more community stakeholders, and the development of a comprehensive strategic plan.

The City of Saint Paul will achieve 21st-century housing equity when our policies and practices work for everyone. This will be achieved when we empower those who have historically been marginalized; when we are responsive to structural and systemic disparities; and when we adapt to the increasingly complex and diverse array of resident needs.

## Overview

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This report is in response to the City Council Resolution 17-2064 directing staff of the Fair Housing Workgroup to develop a Fair Housing Strategic Plan to present to the City Council on March 28, 2018.

### What is Fair Housing?

The purpose of the Fair Housing Act is to ensure that individuals have self-determination in their housing choices free from discrimination and require that governments take proactive steps to remedy past discrimination. Fair housing is the right to choose housing free from unlawful discrimination. When housing choice is limited, a resident's access to place-based assets like schools, employment, parks, and other infrastructure may also be limited.

The Fair Housing Act (FHA) was passed April 11, 1968, one week after the assassination of Dr. Martin Luther King, Jr. whose movement included the fight for equal treatment in housing. The FHA prohibits discrimination based on race, national origin, color, religion, sex, familial status, disability. Not only is intentional discrimination prohibited, but so is disparate impact discrimination which results when neutral policies disproportionately negatively impact people of color and other protected classes.

### The City's Role in Fair Housing

As a recipient of HUD funds, Saint Paul is required to analyze the current fair housing landscape and implement strategies to advance fair housing and overcome barriers to fair housing in our community.

In addition to the HUD requirement, Fair Housing efforts are a critical part of the City's commitment to equity. The experience of being "at home" depends on the quality of housing itself, a sense of community and belonging, and access to amenities. Therefore, virtually all city services touch on housing. Some city departments and functions of City Council and the Housing and Redevelopment Authority (HRA) more directly impact housing. The Department of Planning and Economic Development makes investments in housing, economic development for thriving commercial districts, and engages in long range planning. The Department of Human Rights and Equal Economic Opportunity investigates discrimination complaints, provides fair housing training, and ensures contracts are providing economic opportunities to women, people of color, and low-income people. The Department of Safety and

## Fair Housing Timeline

### 2010

Resolution to continue participating in Metropolitan Councils Local Housing Incentives Account Program and set goal of 2,625 units of affordable housing for period of 2011-2020.

### 2015

Cities of Minneapolis and Saint Paul were named in a fair housing complaint (now resolved) alleging the AI analysis and findings were deficient.

### 2016

Minneapolis and Saint Paul entered into a Voluntary Compliance Agreement with HUD which required the preparation of an AI Addendum to provide a more robust analysis focusing on segregation and integration, areas of concentrated poverty and areas of opportunity.

### 2017

Mayor and City Council directed the creation of a Fair Housing Workgroup to make policy and budget recommendations to the Mayor and HRA with the goal of eliminating housing disparities, lowering barriers to affordable housing, and ensuring access to economic opportunity in the City of Saint Paul.

### 2018

Status update and policy and program options in response to Resolution 17-2064.

### 2020

Next Assessment of Fair Housing due to HUD.

Inspections ensures that rental properties are maintained to the standard of relevant codes and seeks to further safe and high-quality housing where applicable. Within City Council, the Legislative Hearing Officer makes determinations on codes, tax and summary abatement assessments, and certain land use matters.

## **Saint Paul's Participation in the Metropolitan Council's Local Housing Incentives Account Program**

Like most cities in the seven-county metro area, Saint Paul is a participant in the Met Council's Local Housing Incentives Account program. Participation enables the City to apply for development and environmental clean-up grants from the Met Council and DEED, which have awarded funds to numerous Saint Paul projects over the years. To participate, cities are required to set goals for development of affordable and life-cycle housing units over a 10-year period. For the current period (2011-2020), Saint Paul set a goal of developing 2,625 units of affordable housing (defined as units affordable at 60% AMI). This was formalized in Resolution #10-935 in August of 2010.

## **Fair Housing Analysis of Impediments & Addendum**

The City of Saint Paul participates in a fair housing analysis in order to understand its impact on fair housing and address housing discrimination. Because HUD requires both a regional and local analysis, Saint Paul has been a member of the Fair Housing Implementation Council since 2002. The Fair Housing Implementation Council (FHIC) is comprised of seven counties, eight cities, and the Metropolitan Council. The FHIC's two principle activities are preparing an Analysis of Impediments to Fair Housing Choice (AI) every five years and funding fair housing projects responsive to the identified recommendations.

In 2015, the Cities of Minneapolis and Saint Paul were named in a fair housing complaint (now resolved) alleging discrimination in the placement of affordable housing investments and alleging that the AI's analysis and findings were deficient. In May 2016, Minneapolis and Saint Paul entered into a Voluntary Compliance Agreement with HUD which required the preparation of an AI Addendum to provide a more robust analysis focusing on segregation and integration, areas of concentrated poverty and areas of opportunity. This agreement also required a HUD-appointed advisory committee of diverse stakeholders and more robust community engagement. The FHIC agreed to follow the terms set out in the VCAs with Minneapolis and Saint Paul or HUD would have compelled them to do so.

The FHIC funded a comprehensive community engagement process that included 17 community organizations with diverse ethnic and cultural constituencies. Over 800 residents were engaged in meetings, surveys, listening circles, and interviews. The participants represented 61 ZIP codes across the metro, more than 70% were people of color, more than half had household income under \$25,000, and 68% were renters. These participants overwhelmingly represent groups among those most likely to face housing discrimination. A key theme from this engagement was the need to reframe how governments talk about and make decisions regarding people of color. Traditional definitions of "opportunity" tended to place more value on predominately white areas and did not take into account the opportunity provided by community networks, cultural knowledge, and diversity. Similarly "concentration" was used to describe neighborhoods that are majority low income and people of color without analyzing the factors that contribute to the concentration of

predominantly wealthy, white people. Data combined with community perspectives and existing works of local research led to the identification of eight key fair housing issues. Key findings included:

1. How residents value neighborhoods and housing is multifaceted
2. Residential patterns reflect segregation and differing access to opportunity factors by race and ethnicity
3. Areas of concentrated poverty require coordinated place-based investment to increase opportunity for residents
4. Displacement due to gentrification and neighborhood change causes a loss of affordable housing and limits fair housing choice
5. There is a need for expanded distribution of affordable housing across the region
6. Regulation, policies, and funding availability impacts levels of publicly-subsidized and private-market affordable housing development across the region
7. Access to homeownership, rental housing, and housing programs is reduced for some racial and ethnic groups
8. Fair housing enforcement and education is a continuing need

### **AI Addendum Guidelines for a Balanced Approach to Fair Housing**

The FHIC's members must work to facilitate the mobility of residents who wish to locate in their community of choice while simultaneously investing in human capital development and physical improvements in places of concentrated poverty to increase opportunities for residents there. The appropriate balance between these two approaches should be based on these guidelines set out in the AI Addendum:

Investment in construction of new affordable housing should prioritize expanding affordability regionally and within jurisdictions, including in areas with access to opportunity, as defined through a community engagement process which may include, but are not limited to, quality schools, transportation, economic opportunity, and other public resources.

Construction of new affordable units in areas of concentrated poverty, and particularly in areas of concentrated poverty where 50% or more of the residents are people of color, should be considered only as part of a comprehensive community investment strategy to address targeted community housing needs. Preservation of existing affordable housing in these areas should be prioritized over new construction.

Community development investment, to include investments in both people and physical places, should be focused on areas of concentrated poverty, and particularly areas of concentrated poverty where 50% or more of the residents are people of color.

In areas where gentrification is believed to be occurring, preserving the affordability of existing housing and securing property for development of new affordable units should be a priority.

Enforcement of fair housing laws and efforts to prevent housing discrimination are key to opening up a variety of housing options throughout the region in areas of all types of opportunity.



## **AI Addendum Regional Goals**

To implement the above guidelines, the Addendum offers ten goals, each supported by a list of fair housing recommendations corresponding to fair housing issues raised in the Addendum and paired with an implementation timeframe and responsible parties. The members of the FHIC, who will primarily be the responsible entities for carrying forward the recommendations, are diverse in their character, politics, resources, demographics, and challenges. Accordingly, the recommendations allow individual FHIC jurisdictions the latitude to consider and implement the recommended strategies in the ways that are most feasible within their respective jurisdictions. The ten overarching goals are:

1. Improve Opportunities for Mobility within the Region
2. Reduce Resident Displacement
3. Increase Access to Homeownership
4. Expand Funding for Affordable Housing
5. Improve Fair and Affordable Housing Planning
6. Expand Locations of Affordable Housing
7. Institute Effective and Meaningful Community Engagement
8. Invest in Place-Based Community Improvements
9. Support Multicultural Housing Needs
10. Support Residents' Fair Housing Rights

## **Formation of the Fair Housing Work Group**

In response to the extensive analysis and recommendations of the AI Addendum, on June 28, 2017, the Mayor and City Council directed the creation of a Fair Housing Workgroup to be co-chaired by the Deputy Mayor and Chair of the Housing and Redevelopment Authority (HRA). This group is responsible for providing policy and budget options to the Mayor and HRA with the goal of eliminating housing disparities, lowering barriers to affordable housing, and ensuring access to economic opportunity in the City of Saint Paul. The Fair Housing Work Group includes the Deputy Mayor, HRA Chair, and representatives from PED, DSI, HREEO, the City Council, the City Attorney's Office, and a representative from Ramsey County's Policy and Planning Division.

In December 2017, the City Council passed a resolution that the Fair Housing Workgroup will report back to City Council on March 28, 2018 with progress on eleven deliverables, present a Fair Housing Strategic plan, and prepare a budget proposal to support the strategic plan.

## Current State of Housing in Saint Paul

- There are **112,803 households** in Saint Paul<sup>1</sup>, a number that is forecast to grow to **131,400 households by 2030**<sup>2</sup>, necessitating the creation of **over 18,000 new housing units**.
- There are **119,625 units of housing** total in Saint Paul, **72% of which are 50 years or older**.<sup>3</sup> Of those, **112,571 housing units are occupied**;<sup>4</sup> **49.5% are owner-occupied**, and **50.5% are renter occupied**.<sup>5</sup>
- 17,182 rental units, or **30.4% of rental units, are in single family homes or duplexes**.<sup>6</sup>
- **3,568 rental units** in Saint Paul are affordable through the use of **Housing Choice (Section 8) Vouchers** issued by the Saint Paul Public Housing Agency, affordable units which are not reflected in the tables below.<sup>7</sup>
- **50.0% of renter households (occupying 27,899 units) are cost-burdened or severely cost-burdened.**
  - 23.1% of renter households are cost-burdened, spending from 30% through 50% of their household income on rent, and an additional 26.9% of renter households are severely cost-burdened, spending over half of their income on rent.<sup>8</sup> There are significant racial disparities in how this plays out, as shown below.

### Racial Equity Fair Housing Analysis: Saint Paul Housing-Related Disparities by Race/Ethnicity

Race/Ethnicity	Per Capita Income <sup>9</sup>	Homeownership <sup>10</sup>	Housing Cost Burdened <sup>11</sup>
White (not Hispanic or Latino)	\$39,344	60.5%	31.3%
People of Color	\$13,856	27.8%	49.6%

### Saint Paul Affordable Housing by Income Bracket and Type of Housing

Income Bracket <sup>12</sup>	Saint Paul PHA Income Restricted <sup>13</sup>	Other Ownership Income Restricted <sup>14</sup>	Naturally Occurring Affordable Housing <sup>15</sup>	Total

<sup>1</sup> Census Bureau, American Community Survey, 2016, [Table DP02](#)

<sup>2</sup> [Metropolitan Council Population Forecast, Thrive MSP 2040](#), January 1st, 2018 forecasts.

<sup>3</sup> Census Bureau, American Community Survey, 2016, [Table DP04](#)

<sup>4</sup> Census Bureau, American Community Survey, 2016, [Table DP04](#)

<sup>5</sup> Census Bureau, American Community Survey, 2016, [Table DP04](#)

<sup>6</sup> Census Bureau, American Community Survey, 2016, [Table B25032](#)

<sup>7</sup> Saint Paul Public Housing Agency PowerPoint Presentation to Fair Housing Working Group, Fall 2017; we know other agencies issue Section 8 Vouchers that are used in Saint Paul, but are not accounted for in this analysis.

<sup>8</sup> Department of Housing & Urban Development, [Comprehensive Housing Affordability Survey \(CHAS\), 2010-2014](#), Saint Paul Data

<sup>9</sup> United States Census Bureau American Community Survey, Tables B19301A to B19301I, and Table DP05, 5-year estimates, 2012-2016 (midpoint 2014). Computations by Saint Paul Department of Planning & Economic Development Research Team.

<sup>10</sup> United States Census Bureau American Community Survey, Table B25003A-B25003I, 5 year estimates, 2012-2016 (midpoint 2014). Computations by Saint Paul Department of Planning & Economic Development Research Team.

<sup>11</sup> United States Department of Housing and Urban Development, [Comprehensive Housing Affordability Survey \(2010-2014, midpoint 2012\)](#)

<sup>12</sup> The household income ranges that correspond to the listed percentages of Area Median Income (AMI) are ≤30% AMI: ≤\$25,750; >30% to ≤50% AMI: \$25,751 to \$42,900; >50% to ≤80% AMI: \$42,901 to \$65,700; ≤80% AMI: ≤\$65,700; ≤60% AMI: \$51,480.

<sup>13</sup> Saint Paul Public Housing Agency Website, <http://stpha.org/about-sppha>, accessed 3/23/2018; number published on website confirmed as best available in email correspondence with Al Hester, SPPHA Policy Director, 2/22/2018.

<b>≤30% AMI</b>	4,274	2,286	5,000	11,560
<b>&gt;30% &amp; ≤50% AMI</b>	0	1,386	25,354	26,740
<b>&gt;50% &amp; ≤80% AMI</b>	0	6,669	10,411	17,080
<b>≤80% AMI</b>	4,274	10,341	40,765	55,380

### Supply and Demand for Saint Paul Rental Housing

Income Bracket <sup>16</sup>	Renter Households (2016)	Rental Units (2016)	Supply Gap (-) or Surplus (+)	Allocation Gap: Number of Affordable Units Occupied by Higher Income HH Gap (-)	Total Gap (-) or Surplus (+)
<b>≤30% AMI</b>	22,335	11,560	-10,775	-2,825	-13,594
<b>&gt;30% &amp; ≤50% AMI</b>	11,940 <sup>17</sup>	26,740 <sup>17</sup>	+14,800	-9,505	+5,295
<b>&gt;50% &amp; ≤80% AMI</b>	9,200 <sup>17</sup>	17,030 <sup>17</sup>	+7,830	-6,360	+1,026
<b>&gt;80% AMI</b>	13,355	3,285	-10,070	N/A	N/A
<b>TOTAL</b>	56,830	58,615	+1,785	N/A	N/A

## Status Updates on the 11 Resolution Goals

### #1: Engage renters, landlords, housing partners and other stakeholders for input and advice via public meetings and regular consultations

#### Process Owner

Alyssa Wetzels-Moore

#### Description

Eliminating entrenched racial and ethnic disparities requires transforming the systems that created these disparities to achieve new results. A critical piece in this transformation is incorporating stakeholders throughout the decision-making process. Those that are most impacted by housing disparities are uniquely positioned to identify the barriers they face and provide innovative solutions to addressing these barriers. Participation of historically marginalized communities is important to guard against 1) decisions that harm people of color and other protected classes; 2) well-intentioned decisions that also create harm or lead to unintended consequences; 3) well-intentioned decisions that do not solve the problem they are intending to

<sup>14</sup> This represents the total number of income-restricted affordable units shown in HousingLink Streams' data, as accessed

<sup>15</sup> This represents the total number of units affordable to those under each of the respective income ranges according to the 2010-2014 CHAS, minus the number of units via HousingLink Streams 3/2018 data that have affordability restrictions in place, including PHA units. These data combine two different datasets, benchmarked several years apart in time, so provide only a general estimate.

<sup>16</sup> The household income ranges that correspond to the listed percentages of Area Median Income (AMI) are ≤30% AMI: ≤\$25,750; >30% to ≤50% AMI: \$25,751 to \$42,900; >50% to ≤80% AMI: \$42,901 to \$65,700; ≤80% AMI: ≤\$65,700; ≤60% AMI: \$51,480.

<sup>17</sup> While the supply of housing exceeds the number of renters in each income bracket, in units which are not income-restricted, the renters who most need the housing are frequently outcompeted for these units by wealthier renters. Because of things like credit checks, strict income and credit requirements, disqualification due to past bankruptcies or convictions, and the persistence of discrimination by race, ethnicity, and immigrant status, very frequently these higher-income people have an easier time getting into those units than those who truly need this more affordable housing. For more discussion of these dynamics, see pp. Appendix B of this report.

address. As policy-makers evaluate strategies, stakeholder engagement provides critical information on potential benefits and consequences of these initiatives. In order to be effective, engagement must be throughout the decision-making process rather than a point-in-time.

### *Status*

The Fair Housing Work Group discussed past experience with engagement and also reviewed the engagement strategies used to create the Addendum to the Analysis of Impediments. As described in the background section on the AI Addendum above, these strategies were determined to be highly successful because they resulted in a more thorough and nuanced analysis of fair housing and innovative strategies to overcome barriers. The key strategies were 1) Fair Housing Advisory Committee representing diverse perspectives, 2) the Advisory Committee participating in an Undoing Racism Workshop to have common understanding, and 3) funding organizations skilled in community engagement to reach those most impacted, but with the least access to the decision-making process.

The Fair Housing Work Group also conducted a review of the stakeholder landscape in which we identified the level of impact and influence of stakeholders including housing organizations, community advocates, funders, other housing partners, and Saint Paul residents impacted by policy and budget decisions. Based on this review, we identified that those most impacted by decisions had the least access to influence the decision-making process. The ability to influence the decision-making requires mutual education, ongoing trusted relationships, and feedback at critical decision points. Therefore, we recommend an overall approach involving three tiers of engagement 1) an engaged stakeholder group that advises on fair housing strategies on an ongoing basis; 2) mobilization of those most impacted, but least represented in decisions that affect them; and 3) broader community meetings to respond to fair housing proposals.

The Human Rights Division will designate one-time resources to expand and build the capacity for community engagement and enhance collaboration. A draft Request for Proposals (RFP) has been developed and conversations are underway for additional resources from a housing partner.

Finally, rather than contact stakeholders piecemeal, the Fair Housing Workgroup will wait to conduct community engagement in order to align efforts with the direction received in response to this report.

## **#2: Conduct a housing inventory of Naturally Occurring Affordable Housing buildings at risk of displacing tenants and proactively protect these assets**

### *Process Owner*

Patty Lilledahl, PED

### *Description*

The shortage of affordably priced rental housing units and the trend of rent increases creates the need for both public and private efforts to preserve the current housing stock of Naturally Occurring Affordable

Housing (NOAH). NOAH properties are private market rental units that do not have income or rent restrictions controlled by the public sector. Lower-income renters must compete with an increasing renter

population with higher incomes for non-luxury apartments of decent quality and in neighborhoods of their choosing. Renters with credit issues or questionable rental histories are particularly at a disadvantage to compete for a declining supply of decent units. Given income disparities by race, shrinking availability creates a fair housing issue as people of color disproportionately are limited to only a few areas in the City.

The City does not have current data on privately-owned unsubsidized properties that are most at risk of large rent increases or a change in ownership that could result in displacement.

### *Status*

PED is currently data gathering sources that would be used to develop the NOAH inventory.

Staff has developed an inventory of Project Based Section 8 property in Saint Paul to include, in part, the Contract expiration date and Administrator (MHFA or PHA).

## **#3: Fire Certificate of Occupancy Program and Housing Equity**

### *Process Owner*

Travis Bistodeau, DSI

### *Description*

One of the responsibilities of the Department of Safety and Inspections (DSI) is to ensure that commercial and residential properties are maintained in such a fashion that they are safe for all building occupants. The Fire Safety Division of DSI is charged with ensuring that non-owner occupied residential rental properties are maintained to the standards set forth in the MN Fire Code and Chapter 34 of the Saint Paul Legislative Code. As a result, Fire Safety staff routinely inspect non-owner occupied rental properties on a progressive schedule, where the properties with the most and most severe deficiencies are inspected more frequently. Grades range from an A to a D. Although DSI's role is primarily focused on building maintenance, due to the very nature of our work, we are often involved in fair housing issues. For this reason, exploring DSI's work as it relates to fair housing is a focus of this strategic report.

### *Status*

In partnership with the Fair Housing Work Group, and other efforts, DSI has focused on three fair housing related issues: consistency of inspections, customer education, and minimizing occupant displacement.

Results of these efforts are as follows:

1. **Consistency of Inspections**-Customers, including tenants and landlords, have complained that the quality of inspections are not consistent from year to year, or regarding the severity of a particular violation. DSI has implemented the following activities to address these concerns:
  - a. Increased mandatory staff training time by approximately 10%. New training includes an enhanced focus on Customer Satisfaction.
  - b. Supervisor 'ride-alongs' are now part of annual performance assessments for inspectors

- c. Created quarterly in-house training sessions with Construction Services trade experts to increase inspector knowledge
  - d. Contracted with an online training provider to create and monitor training content for all staff
2. **Customer Education**-Customers have little understanding of how the Certificate of Occupancy program works and the value of the data it can provide to tenants. Property owners were unaware that this program is incentive based and that the fewer deficiencies a property has, the fewer inspections (and fees) are required. The data resulting from these inspections can be especially helpful to potential tenants as they 'shop' for a new place to live in Saint Paul. DSI has implemented the following activities to address these concerns:
- a. Require all new landlords attend a Landlord 101 training session as part of obtaining a Certificate of Occupancy-This mandatory training explains how the our incentive based program works to minimize costs to the property owner while helping to ensure the property is maintained to the highest standard possible.
  - b. All inspection reports are available online-This allows potential tenants to review inspection reports prior to signing a lease, helping tenants make an informed decision about their housing. This is also helpful to current tenants who want to learn more about the deficiencies observed in their current building.
  - c. Provide a 'cheat sheet' to property owners prior to their inspection explaining the program and instructions on how to receive high scores-This document explains the incentive based program to property owners prior to an inspection, encouraging repairs be made before the inspection takes place.
  - d. Partner with Family Housing Fund and Carlson School of Management to build a database tool to increase tenant knowledge regarding rental properties and landlords. This tool will allow tenants to more fully screen their potential future landlord/property before signing a lease. This work is under development and will be complete by May 15<sup>th</sup>.
  - e. Developed online Fire Certificate of Occupancy map to allow tenants to easily identify the grade of a rental property-This effort allows tenants to determine the inspection grade of a property before signing a lease.
3. **Minimize Occupant Displacement**-There are situations where a building owner fails to bring a building into compliance within a reasonable amount of time or exposes occupants to an unsafe condition. Unfortunately, DSI is occasionally forced to vacate buildings such as these. As a result, tenants are forced out of their homes, due to no fault of their own. DSI has implemented the following activities to address these concerns:
- a. Enhanced existing Emergency Notification System to better notify stakeholders who can assist tenants or landlords and prevent a certificate revocation/condemnation-Stakeholders receive a weekly, automated email and are now able to determine what properties are likely to be vacated by DSI and help prevent tenant displacements or assist in a housing transition. Interested stakeholders can sign up through the citywide ENS system. There is currently a marketing effort focused on the Frogtown and Rondo neighborhoods.
  - b. Collaborated with Emergency Management to seek FEMA funding to develop a scalable Emergency Housing Plan for Saint Paul. This plan will identify current and future resources

needed to house residents primarily impacted by a terroristic disaster but could also be scalable to the condemnation of an individual building. This plan may be a resource to guide future emergency housing assistance resources for the city. A grant application to support this initiative will be submitted in May with a response expected from FEMA in August, for a potential 1/1/19 start date.

- c. Assisted the Department of Planning and Economic Development to develop small rental rehabilitation fund-This program provides interest free dollars to property owners to help improve the quality of rental housing stock. Priority is given to the most challenged properties or those located in areas of concentrated poverty within the city.

#### **#4: Expand HREEO's Fair Housing Training Program**

##### *Process Owner*

Alyssa Wetzel-Moore, HREEO

##### *Description*

The Human Rights Division currently provides training to a number of stakeholder groups including those that could be potential complainants or respondents in a human rights investigation. These trainings are tailored to the audience and provide an overview of civil rights laws and the complaint investigation process. In the housing context, topics range from a basic overview of the Fair Housing Act and how to recognize discrimination to a more advanced review of disparate impact and affirmatively furthering fair housing. For audiences such as property owners and managers, the trainings are designed to prevent discrimination through education on avoiding discrimination, providing accommodations, and preventing harassment and retaliation. For audiences such as renters, housing non-profits, and advocates, these trainings are designed to inform audiences of their civil rights, how to identify potential discrimination, and how to file a discrimination complaint.

In 2018, Human Rights will build upon existing training materials to develop interactive curricula targeting property owners and managers in the City of Saint Paul. The first phase will consist of a training targeted at past respondents. Future phases will involve collaboration with DSI to identify property owners and managers to whom the training will be marketed. This program will prioritize landlords that do not have the resources for professional property management firms and therefore, are less likely to understand their legal obligations under the Saint Paul Human Rights Ordinance. Similarly, these trainings will prioritize owners with Limited English Proficiency. These partnerships may also serve the larger goal for stakeholder input on the policy changes the Fair Housing Work Group is exploring.

##### *Status*

In 2017, fair housing trainings were developed and provided to over 300 property managers and landlords. The training content developed last year has formed the basis for additional trainings designed specifically for Saint Paul property owners and managers. The initial target audience for a training scheduled in April 2018 will be Respondents to discrimination complaints investigated by the Human Rights Division.



To support the Fair Housing Strategic Plan, the Fair Housing Workgroup discussed include fair housing training for elected officials and city staff focusing on disparate impact.

## **#5: Saint Paul Fair Housing Web Portal**

### *Process Owner*

Amy Geisler, PED

### *Description*

Until recently, fair housing-related content has been located in multiple locations on the City's website (PED, HREEO, and DSI). Consolidating this information in one location will streamline future updates, help communicate the City's efforts around Fair Housing, and provide fair housing resources to the public.

### *Status*

PED, DSI, and HREEO staff collaborated on website updates, which went live on February 23, 2018. The website will be updated with the roll out of the strategic plan. <https://www.stpaul.gov/fair-housing>

## **#6: Further Fair Housing Goals**

The policy and research ideas detailed under this item have been identified as recommendations to overcome barriers to fair housing in the 2017 Analysis of Impediments Addendum. The three separate sub-topics in this section – tax policy, tenant protections, and gentrification research are discussed separately below.

### ***6a: 4(d) Tax Policy***

#### *Process Owner*

Patty Lilledahl, PED

#### *Description*

Affordable rental housing projects that receive "traditional subsidies" from the City or State (such as HOME, CDBG, Low Income Housing Tax Credits, Tax Increment Financing and Tax-Exempt Housing Revenue Bonds) are currently eligible to apply under State statute to receive a lower property tax rate classification referred to as 4(d); thereby lowering real estate taxes owed. The City does not currently have a 4(d) Tax Policy as eligibility is authorized through state tax legislation (whenever the City or State award "traditional subsidies" to a project). NOAH properties are not currently eligible for reduced real estate taxes, unless the owner receives City financial assistance, and, where the owner agrees to rent and income restrictions.

#### *Status*

The FHIC contracted with the Housing Justice Center to update its past research the expanded use of the 4(d) program, which is underway. The NOAH inventory described under deliverable #2 needs to be completed before the full impact of an expanded 4(d) program to the City's tax base could be evaluated. A City 4(d) Property Tax Policy, which could include existing NOAH properties, should be informed by OFS, HRA Chair.



To illustrate this strategy, in the fall of 2017 staff worked with Aeon (a very experienced non-profit affordable housing provider and manager) to assist in acquiring a NOAH property at 180 Larpenteur Avenue, which was a part of a 10 building purchase from a seller's portfolio located in 3 metro cities. The HRA Board approved \$40,000 in pooled TIF funds to assist in immediate capital improvements in exchange for executing a loan agreement to restrict the rents of all 82 units to households earning 60% AMI or less for a period of 15 years. This loan and restrictive rent agreement will allow Aeon to qualify for the property for a 4(d) property tax classification which will lower the real estate taxes by \$37,575 (\$11,650 city portion) to assist in maintaining affordable rents.

Staff advises that a 4(d) Tax Policy for the City should be considered as a strategy to assist in maintaining affordable rents in NOAH properties.

### ***6b: Tenant Protections***

#### ***Process Owner***

Alyssa Wetzel-Moore, HREEO

#### ***Description***

Recognizing that stable housing is necessary for success in all aspects of life, tenant protections are designed to provide stability, particularly in a tight rental market. The balance of power in the landlord-tenant relationship tips in favor of the landlord and results in housing instability for some tenants. Because of income disparities, fair housing is implicated by sudden increases in rent or changes in tenant acceptance criteria because these may disproportionately impact people of color, people with disabilities, women, and families with young children.

The following tenant protections were identified in the AI Addendum and Council Resolutions:

1. Advance Notice of Sale: Provides tenants and the City of Saint Paul advance notice (typically 90 days) to have the opportunity to meet the terms of sale by providing time for partnerships with non-profit developers, city land trust initiatives;
2. Tenant Remedies Actions: for non-compliant landlords, a fund (which does not currently exist) is created to cover immediate life and safety issues to maintain C of O so that tenants can continue living in their unit. Tenants rent payments are escrowed until the issue is resolved. This may involve appointing a receiver to operate the property and oversee the corrections. The City can empower the CAO to enforce these actions and recuperate costs through property tax assessment.
3. Just-cause eviction: Designed to prevent at-will lease terminations of tenants who are complying with their lease. New or current property owners looking to attract a different demographic will terminate leases of lease-compliant tenants in order to enact more restrictive criteria. This has fair housing implications because typically much higher income ratio requirements are imposed, Housing Choice Vouchers are no longer accepted, or more stringent credit or criminal background policies.

## Status

The co-chairs of the Fair Housing Work Group created a sub-committee to work on potential strategies to improve tenant rights around eviction, building sale, and rent increases. Responsibilities included reviewing work of other jurisdictions around tenant protections. Ultimately, we determined that strategies around this work needed to be incorporated into the broader discussion of the Fair Housing Workgroup.

The Fair Housing Work Group met with the Family Housing Fund to review the work of the Second Judicial District housing court work group and its recommendations (see Appendix B.2). The goal of these recommendations is to mediate conflicts prior to the filing of an unlawful detainer, prevent unlawful detainer from going on a tenant's record if the tenant is found not at fault, and to expunge unlawful detainers in a timely manner after the tenant has met the terms of the settlement agreement. There may be opportunities for the City to collaborate in these efforts.

The Fair Housing Work Group has also discussed the disparate impact of credit and criminal background screening on protected classes. HUD guidance on criminal background screening recommends taking into account recidivism research (likelihood of recidivism is the same as someone with no record after 5 to 7 years for most crimes) and disregarding arrest records that did not result in a conviction. Ten cities have passed ordinances related to criminal background screening. With respect to credit records, there is evidence to show disparate impact in the calculation of credit scores due to disparities in home ownership and limited access to banks in lower-income communities of color. Credit scores are harmed by late payments, but the majority are not increased with timely rent payments or payments to pay-day lenders. Experian is the first credit reporting agency to consider reported rent payments into the credit score process.

Finally, the City of Saint Paul, through its participation on the Fair Housing Implementation Council awarded a grant to the Housing Justice Center to conduct policy and legal research on tenant protections. The final product is due no later than August 31, 2018.

## ***6c: Gentrification and Displacement Research***

### Process Owner

Amy Geisler, PED

### Description

Displacement due to gentrification and neighborhood change causes a loss of affordable housing and limits fair housing choice.

### Status

The Center for Urban and Regional Affairs have completed quantitative and qualitative research of Minneapolis and Saint Paul neighborhoods which included Frogtown/Thomas-Dale, Hamline-Midway, and the West Side. Findings concluded that gentrification has occurred or may be occurring in these neighborhoods, and that fear of displacement is present. Areas citywide identified as "at risk" will be evaluated for use of anti-displacement strategies which may include land trusts and the possible purchase of NOAH properties by non-profit partners.

Support from the Family Housing Fund has enabled staff to work with the Carlson School's Data Analytics Lab to create a fair housing related database (to be completed in May 2018). This database is designed to create transparency in the rental market by intersecting data on City inspections, complaints, crime, Census, and other data for two distinct purposes:

- 1) a dashboard for renters and housing advocates to research a specific property and property owner for rental or advocacy purposes; and
- 2) a policy dashboard to identify trends related to quality of life, investments, and displacement trends.

The City of Saint Paul, in a joint application with the City of Minneapolis, has been accepted by Policy Link to participate in the Anti-Displacement Network cohort to explore policies, best practices, and data on displacement prevention. This work will be launched on the Policy Link Conference in Chicago from April 11<sup>th</sup> to 13<sup>th</sup> and complete in April 2019.

## **#7: Monitor Effectiveness of Rental Rehabilitation Loan Program and Suggest adjustments as Needed**

### *Process Owner*

Patty Lilledahl, PED

### *Description*

The Rental Rehabilitation Loan Program was created to assist responsible landlords with health and safety-related property improvements and to preserve existing affordable units. The Program offers 0%, ten year loans up to \$30,000 for eligible improvements to single family, duplex, triplex or fourplex buildings. The AI Addendum recommended this strategy to ensure that improvements in housing quality do not lead to rent increases that make the property unaffordable.

### *Status*

PED staff worked closely with DSI staff to develop and promote the program to eligible landlords.

The Program is up and operating. Staff has closed/approved funding for 4 applications totaling \$96,362 leaving a remaining balance of \$653,638. The applications included: replacing a roof, tree trimming, plumbing work, and replacing a furnace. On February 1<sup>st</sup>, the Program was expanded to the entire City for properties classified by DSI as C and D (worst rating) and to A and B classified properties in ACP50 areas.

## **#8: Research and Support Alternative Affordable Homeownership Options**

### *Process Owner*

Patty Lilledahl, PED

### *Description*

Supporting alternative homeownership options is a strategy to reach potential homeowners of lower incomes which may help address homeownership disparities in Saint Paul. Strategies such as manufactured building techniques, cluster housing and/or tiny/small homes may prove to be less costly to produce and resulting in reduced home prices for the homeowner. Limited Equity Cooperatives and Land Trusts, which limit the appreciation a homeowner can collect upon a sale of the home, create an affordable housing option to a new buyer.

### *Status*

PED has funded the Rondo Land Trust on a very limited basis and recommends identifying additional resources for this work. PED staff are also participating in the Homeownership Opportunity Alliance committee comprised of lenders, real estate agents, housing partners and stakeholders who are researching strategies that can be used to create opportunities and reduce barriers to homeownership. The committee will release a report in May on their recommendations, which may include changes to existing mortgage products, best practices and system changes to advance homeownership equity.

## **#9: Commercial Vitality Zone**

### *Process Owner*

Martin Schieckel, PED

### *Description*

The CVZ Program invests in neighborhood commercial districts to promote city-wide vitality, growth and equity. The program has been funded on an annual basis through the City's budget process; staff also recommend areas to be designated as a CVZ on an annual basis. The source of funds is a half-cent local sales tax used to further residential, cultural, commercial, and economic development. This long-range commercial investment strategy will attract and retain businesses and customers to our commercial zones, create quality job opportunities, grow and expand business success, expand the tax base, strengthen our neighborhoods and communities, and advance sustainable development.

### *Status*

Three years into the CVZ Program, and many lessons have been learned about this new effort. PED staff see the value in strong community partnerships through this program, working closely with neighborhood groups and business associations to ensure investments are strategic and catalytic. Staff and community partners also value the impact that a targeted capital investment or improvement project can have on a neighborhood commercial district or node.

That said, the work takes time to ensure the local business owners and residents are engaged in the decision-making process. Furthermore, at times, the timing for financing of other large and complementary investments, or working with private property and business owners to develop a project that has the owners' buy-in and some contribution from them, is a challenge. It is a lengthy but worthwhile endeavor to strategically invest in capital improvements in our challenged neighborhood districts.

The overview of CVZ investments in the first three years of operation are as follows:

1. 9 neighborhood commercial districts with new investment
2. \$2,250,000 committed over 3 years
3. \$1,562,500 (69%) spent or planned use is moving forward
4. \$687,500 (31%) has a list of ideas that need to be prioritized, mostly District del Sol and Central Selby funds (total of \$625,000 or 28% of the total funds)

## **#10: Housing Choice Voucher Program**

### *Process Owner*

Alyssa Wetzel-Moore, HREEO

### *Description*

The Housing Choice Voucher (Section 8) program was created to provide a rent subsidy to income-eligible households and to allow housing choice in the private market. The majority of participants in the Housing Choice Voucher are members of protected classes – people of color, people with disabilities, and families with young children. The purpose of the HCV program is to both expand housing choice and promote racial and ethnic integration. Landlords are not required to accept the vouchers which can limit tenant options thereby limiting choice. The program was designed by Congress to work with market forces. For example, if a HCV holder cannot find a landlord to accept their voucher due to the landlord's screening criteria, the voucher expires and goes to another eligible family.

The Saint Paul Human Rights Ordinance prohibits discrimination on the basis of public assistance status. In other words, someone should not be treated differently because they receive public assistance. Although a Housing Choice Voucher is a form of public assistance, participation in the program requires that the landlord comply with Section 8 program requirements. A 2008 Minnesota court of appeals decision determined that a property owner or management has not discriminated on the basis of public assistance if they choose not to rent to an individual with a voucher because they find participation in the program to be burdensome. Because Saint Paul's Human Rights Ordinance language is modeled after the state statute, this court decision prevents the City from accepting discrimination complaints based on a landlord's refusal to participate in the Housing Choice Voucher program.

### *Status*

The Saint Paul Public Housing Agency (SPPHA) provided a presentation to the Fair Housing Work Group and to the HRA on its program's metrics. Their waiting list was closed to new applications from 2007 to 2015. In 2015, the waiting list opened for one week and SPPHA received 12,000 applications. SPPHA issues 300 to 400 vouchers per year from the waiting list. SPPHA has a 100% voucher utilization rate; this is measured by the number of months any voucher is being used. However, 15% of the people awarded a voucher lost that opportunity because they were unable to place their voucher during the 60-day placement window; this voucher was given to the next person on the waiting list.

HUD calculates Fair Market Rent based on the average market rent for the metro area based on bedroom size. SPPHA sets the family size and payment standards which can range from 90% to 110% of the Fair Market Rent. If a unit exceeds the payment amount, voucher holders cannot spend more than 40% of their income to rent the unit. Both because of acceptance and affordability, about two-thirds of vouchers are placed in areas with a lower-median income and a majority of people of color (see Appendix B.4 for HOMELine study). There are neighborhoods in Saint Paul where the average rent exceeds the maximum rent payment. SPPHA, in its presentation to the HRA, discussed the possibility of increasing the maximum rent payment in neighborhoods or census tracts where rent is higher. These areas tends to be predominantly white, higher income areas. Crafting such a plan would require consideration of available rental units and criteria to determine the appropriate boundaries where SPPHA would increase the voucher payment amount. It is also important to consider that increasing the voucher payment will reduce total number of vouchers SPPHA is able to fund unless others funds are available to cover the gap.

The Fair Housing Workgroup also met with tenant stakeholder organizations to hear perspectives on the customer experience in placing their voucher. They expressed concerns about the downward spiral that results when families lose their housing when landlords choose to no longer accept vouchers. They raised concerns about the stress and instability created in trying to place their voucher in the 60-day window and the quality of housing available. A study by HOMELine identified that only 17% of the total units for rent were available to voucher holders during the two-month study period. With approximately a 2 to 3% vacancy rate for all units, this means that a small portion of vacant units are available to housing choice voucher holders.

In order to expand housing choice and minimize disruption in the housing search, there is a need to maintain participation of current landlords and increase landlord participation in the Housing Choice Voucher program. The SPPHA both has long-standing and new measures in place to retain landlords, and remains open to any additional program improvements. In addition to fostering the ongoing relationship with the SPPHA, the Fair Housing Workgroup is also monitoring the court challenge to the Minneapolis Section 8 anti-discrimination ordinance, as this decision may have policy implications in Saint Paul.

## **#11 Evaluate the need for a formal Fair Housing position**

### *Process Owner*

Alyssa Wetzels-Moore, HREEO

### *Description*

Advancing fair housing and addressing housing disparities necessarily involves transforming the systems and practices to create new and better results. An important part of this systems change is a change in operations which would include a fair housing position to coordinate and oversee the City's Fair Housing work. The Fair Housing Work Group has been successful in identifying opportunities for collaboration and initiatives to address housing disparities and minimize harm to protected classes. However, existing members cannot expand their workload to the extent necessary to accommodate the volume and complexity of work necessary to make measurable strides to address disparities and advance fair housing. Successfully implementing these strategies in a timeline responsive to these urgent housing needs requires expertise in fair housing law and policy, project management of fair housing initiatives, management of the strategic planning process,

coordination with the Mayor's Office, City departments, and City Council to advance a shared fair housing vision, effective coordination of the Fair Housing Workgroup and Fair Housing Advisory Commission, as well as extensive coordination and partnerships with a complex web of actors -- cities and counties in the region and nation-wide, residents, advocates, neighborhood organizations, community organizers, non-profit agencies, developers, funders, housing partners, and other entities whose work intersects with fair housing such as workforce development, education, health, and transportation.

### *Status*

The Fair Housing Work Group has discussed the need for this position, possible responsibilities, and met with funders who have expressed interest in funding the position before the 2019 budget cycle.

## Policy and Program Options

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The City of Saint Paul will achieve 21st-century housing equity when our policies and practices work for everyone. This will be achieved when we empower those who have historically been marginalized; when we are responsive to structural and systemic disparities; and when we adapt to the increasingly complex and diverse array of resident needs.

The Fair Housing Work Group recognizes that advancing a broad vision for fair housing requires a comprehensive, long-term approach that aligns and integrates our resources as a City across a full continuum from homelessness to homeownership. And, the Work Group recognizes that some Saint Paul residents are in crisis today, requiring shorter-term policy and program activities. The goal of the policy, program, and infrastructure options outlined in this section are therefore twofold:

- **to provide a roadmap to advance the 11 specific fair housing goals named in the resolution; and,**
- **to set the stage for a comprehensive fair housing strategic planning process informed by robust community engagement.**

Through the work outlined in this report, the Fair Housing Workgroup arrived at the following program and policy options to advance the 11 fair housing goals identified in the Council resolution. The options are organized into three community impact areas: 1) Preservation and Production of Affordable Housing; 2) Displacement Prevention; and 3) Enforcement and Education.

To ensure that fair housing efforts are sustained, coordinated, and equitable the Work Group identified a group of options for infrastructure to support fair housing implementation, including the development of cross-functional work groups to identify and implement priorities in each of the three community impact areas, broadening the Work Group to include more community stakeholders, and the development of a comprehensive strategic plan.



## A. Preservation and Production of Affordable Housing

Because the City is losing more affordable units than it has the ability to produce, preservation of existing affordable housing is an urgent fair housing need. The per capita income of a white person is three times that of a person of color. Therefore, affordable housing policies and strategies must include an understanding of the impact on people of color and other low-income individuals. These policy and program options aim not only to preserve affordable housing, but also to ensure it is of high-quality and available throughout the City of Saint Paul.

1. NOAH Preservation
  - a. Direct staff to explore options to gather data for a NOAH property inventory.
  - b. Staff to identify partnerships such as the NOAH Impact Fund and preservation buyers together with Landlords and Sellers to help develop early warning and notices of potential property sales.
  - c. Support a local funding source to leverage other funding partners for the preservation of existing affordable rental units.
2. 4(d) Policy for Preservation of Affordable Housing
  - a. Estimate the loss in real estate tax collections to the City if a 4(d) Policy is expanded to NOAH properties.
  - b. Develop a 4(d) Property Tax policy targeted to assist NOAH properties most at risk to displace tenants.
3. Rental Rehabilitation Loan Program
  - a. Continue to monitor effectiveness of the Rental Rehabilitation Loan Program and identify changes as needed.
  - b. Continue to market program to expand participation.
4. Expand Acceptance of Housing Choice Vouchers
  - a. Create incentives for expanded landlord participation, particularly in higher-income neighborhoods, such as one-time signing bonus for new landlords, and provide connections with partnerships for weatherization and utility savings, lead abatement, and others.
  - b. Review HRA Program guidelines to require projects receiving city financial assistance to participate in the Section 8 Voucher Program.
  - c. Work with partners to gather information on the customer experience of the use of Housing Choice Vouchers to identify challenges and solutions.
  - d. Build and expand on partnerships with developers and other housing partners to accept Housing Choice Vouchers.
  - e. Partner with SPPHA to include training on the Housing Choice Voucher program in DSI's Landlord 101 trainings.
5. Alternative Homeownership Models
  - a. Research options to reduce costs in the production of housing and alternative ownership models.
  - b. Propose a 2019 budget request for funding homeownership opportunities.



- c. Closely monitor the Homeownership Opportunity Alliance May report and update strategic plan to consider policy or program changes to incorporate recommendations.

## **B. Displacement Prevention**

Displacement sparks a chain reaction of disruption that can destabilize families and the broader community. Rising rents not only reduce available affordable units, but also can cause significant demographic and cultural shifts in historic neighborhoods of color due to income disparities by race. From 2010 to 2014, the median rent rose by 31% in Frogtown and 84% in sections of the Hamline-Midway neighborhood. Since 2012, clusters of property sales have increased along I-94 corridor in Summit-University, Union Park, and Macalester-Groveland, Hamline-Midway, and Thomas-Dale/Frogtown. Not only are property sales likely to result in rent increases, but they can also result in changes in tenant screening criteria that displace existing tenants.

1. Tenant Protections
  - a. Develop policies informed by best practices to reduce the disparate impact of criminal background and credit checks.
  - b. Explore City-initiated Tenant Remedies Actions
  - c. Implement stakeholder engagement plan to review tenant protection analysis and inform policy.
2. Gentrification and Displacement
  - a. Prioritize preservation in areas that have been identified as at risk for gentrification and displacement.
  - b. Identify best practices for displacement prevention as a cohort member of Policy Link's All-In Anti-Displacement Network (April 2018 to April 2019)
  - c. Consider anti-displacement policy changes proposed in this report including tenant protections (B.1.), preservation of NOAH properties (A.1), and Rental Rehabilitation Loan Program (A.3).
3. DSI Certificate of Occupancy Program
  - a. Promote free legal aid resources and other services within the community
  - b. Collaborate with stakeholders to develop an emergency housing plan for displaced occupants of vacated properties.
  - c. Require DSI supervisors review all revocations and condemnations prior to taking tenant displacement action
  - d. Provide a revolving emergency fund to cover the up-front costs of repairs and administrator costs (in the case of a Tenant Remedies Action) to ensure code compliance and prevent a revoked C of O. These funds would be made available if the city has cause to believe (to be defined) that the building owner will not make the required repairs or resolve the unsafe condition in the specified time frame. Costs incurred to the emergency fund will be billed to the property owner through a property tax assessment.
  - e. Develop criteria with the City Attorney's Office, the Office of Financial Services, and DSI to allow for city-initiated Tenant Remedies Actions (TRA). A city-initiated TRA

process would allow the city to immediately and directly assist tenants who wish to file a TRA with the court system and expedite code required repairs to a rental property. The current process requires tenants to contact a legal service independently (similar to Southern Minnesota Regional Legal Services) to initiate a TRA.

4. Commercial Vitality Zone Program
  - a. Continue to evaluate the CVZ Program, with a short-term goal of seeing signs of private investment, and long-term goals of growth in tax base, and living wage and career-ladder jobs.
  - b. Evaluate the Program's potential to retain existing residents and businesses, with an aim to prevent displacement.
  - c. Seek funding for two more zones in 2019. Staff is in the process of preparing a recommendation on new zones for 2018.

### **C. Enforcement and Education**

Both DSI and HREEO are responsible for enforcing City Ordinances related to housing and both Departments regularly provide trainings to the public. Education of property owners and managers is an important strategy to prevent violations in the first place. Therefore in 2018, HREEO and DSI will emphasize training property owners and managers as a strategy to protect tenants' fair housing rights and access to quality housing.

1. Expand DSI's Landlord 101 to include a specific fair housing module.
2. Coordinate between DSI and HREEO in landlord fair housing education.
3. Further incorporate a plain language focus into Fire Safety documents to create equitable access.
4. HREEO will schedule a series of landlord trainings in 2018 and explore incentives for participation.

### **D. Infrastructure to Support Implementation**

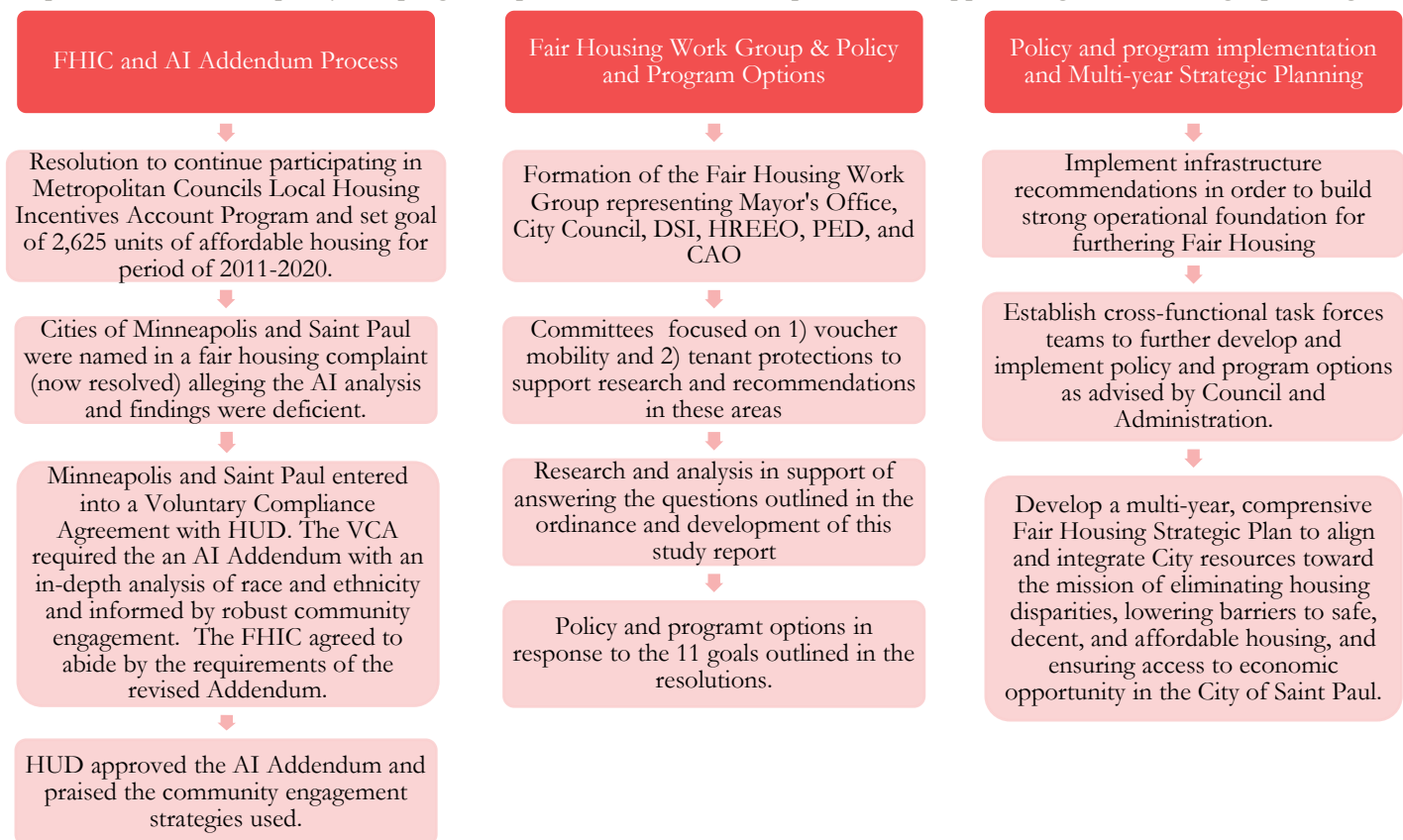
Building a fair housing infrastructure into the City's operations is essential to ensuring that fair housing efforts are sustained, coordinated, and equitable. Critical components are a fair housing position to coordinate and advance the work, a fair housing advisory commission and implementation task forces, and ongoing community engagement to empower those who have historically been marginalized.

1. Formation of three task forces comprised of community stakeholders, City staff, and policy makers to identify and implement priority policy and program options in each of the three community impact areas ( 1)Preservation and Production of Affordable Housing; 2) Displacement Prevention; and 3) Enforcement and Education).
2. Fair Housing Implementation Manager
  - a. Create and fund a Fair Housing Implementation Manager position to begin in 2018.
  - b. Commit ongoing funds for this position in the 2019 budget and thereafter.
3. Develop a multi-year, comprehensive Fair Housing Strategic Plan to align and integrate City resources toward the mission of eliminating housing disparities, lowering barriers to safe, decent, and affordable housing, and ensuring access to economic opportunity in the City of Saint Paul.

4. Expand the Interdepartmental Fair Housing Workgroup to include more community stakeholders in order to provide oversight for strategic planning process.
5. Community Engagement
  - a. Create a Saint Paul Fair Housing Advisory Commission that would be part of the City's Fair Housing Strategic Planning process and advise on its implementation;
  - b. Provide funds to sustain HREEO's community engagement grants (RFP to be issued late March 2018).
  - c. Adopt and use Equitable Development Scorecard city-wide (see Appendix B.5) as a means to ensure quality community engagement that provides tangible outcomes. Presently PED utilizes a Program/Project Evaluation tool to guide funding decisions at the Resource Team.
  - d. Leverage existing resources provided to District Councils to include a fair housing engagement requirement in their scope of work.
6. Fair Housing overview for policy makers which will include information on the Fair Housing Act and how to consider disparate impact and affirmatively furthering fair housing in the decision-making process.
7. HREEO will issue a fair housing education and community engagement RFP and seek additional funds for expansion.
8. Continue to update the Fair Housing website as needed to keep the public informed of fair housing activities in the City.

## Strategic Planning Process

As outlined in the background section, this report is part of a larger process to understand the state of Fair Housing in the City of Saint Paul and to expand our approach to housing policy and programming to better address community needs and assets. The process began with the development of the FHIC and the AI Addendum Process. Then, the Fair Housing Work Group was formed and directed to respond to the 11 goals outlined in the resolution. The resulting policy and program options are outlined in this report. As next steps, the Work Group recommends establishing additional infrastructure to support the further development and implementation of the policy and program options outlined in this report and to support longer-term strategic planning.



## Table of Policy and Program Options

Fair Housing Theme	Recommendation
<b>A. Preservation and Production of Affordable Housing</b>	1. NOAH Preservation <ol style="list-style-type: none"> <li>a. Direct staff to explore options to gather data for a NOAH property inventory.</li> <li>b. Staff to identify partnerships such as the NOAH Impact Fund and preservation buyers together with Landlords and Sellers to help develop early warning and notices of potential property sales.</li> <li>c. Support a local funding source to leverage other funding partners for the preservation of existing affordable rental units.</li> </ol>
	2. 4(d) Policy for Preservation of Affordable Housing <ol style="list-style-type: none"> <li>a. Estimate the loss in real estate tax collections to the City if a 4(d) Policy is expanded to NOAH properties.</li> <li>b. Develop a 4(d) Property Tax policy targeted to assist NOAH properties most at risk to displace tenants.</li> </ol>
	3. Rental Rehabilitation Loan Program <ol style="list-style-type: none"> <li>a. Continue to monitor effectiveness of the Rental Rehabilitation Loan Program and identify changes as needed.</li> <li>b. Continue to market program to expand participation.</li> </ol>
	4. Expand Acceptance of Housing Choice Vouchers <ol style="list-style-type: none"> <li>a. Create incentives for expanded landlord participation, particularly in higher-income neighborhoods, such as one-time signing bonus for new landlords, and provide connections with partnerships for weatherization and utility savings, lead abatement, and others.</li> <li>b. Review HRA Program guidelines to require projects receiving city financial assistance to participate in the Section 8 Voucher Program.</li> <li>c. Work with partners to gather information on the customer experience of the use of Housing Choice Vouchers to identify challenges and solutions.</li> <li>d. Build and expand on partnerships with developers and other housing partners to accept Housing Choice Vouchers.</li> <li>e. Partner with SPPHA to include training on the Housing Choice Voucher program in DSI's Landlord 101 trainings.</li> </ol>
	5. Alternative Homeownership Models <ol style="list-style-type: none"> <li>a. Research options to reduce costs in the production of housing and alternative ownership models.</li> </ol>

Fair Housing Theme	Recommendation
	<ul style="list-style-type: none"> <li>b. Propose a 2019 budget request for funding homeownership opportunities.</li> <li>c. Closely monitor the Homeownership Opportunity Alliance May report and update strategic plan to consider policy or program changes to incorporate recommendations.</li> </ul>
<p><b>B. Displacement Prevention</b></p>	<ol style="list-style-type: none"> <li>1. Tenant Protections <ul style="list-style-type: none"> <li>a. Develop policies informed by best practices to reduce the disparate impact of criminal background and credit checks.</li> <li>b. Explore City-initiated Tenant Remedies Actions</li> <li>c. Implement stakeholder engagement plan to review tenant protection analysis and inform policy.</li> </ul> </li> <li>2. Gentrification and Displacement <ul style="list-style-type: none"> <li>a. Prioritize preservation in areas that have been identified as at risk for gentrification and displacement.</li> <li>b. Identify best practices for displacement prevention as a cohort member of Policy Link's All-In Anti-Displacement Network (April 2018 to April 2019)</li> <li>c. Consider anti-displacement policy changes proposed in this report including tenant protections (B.1.), preservation of NOAH properties (A.1), and Rental Rehabilitation Loan Program (A.3).</li> </ul> </li> <li>3. DSI Certificate of Occupancy Program <ul style="list-style-type: none"> <li>a. Promote free legal aid resources and other services within the community</li> <li>b. Collaborate with stakeholders to develop an emergency housing plan for displaced occupants of vacated properties.</li> <li>c. Require DSI supervisors review all revocations and condemnations prior to taking tenant displacement action</li> <li>d. Provide a revolving emergency fund to cover the up-front costs of repairs and administrator costs (in the case of a Tenant Remedies Action) to ensure code compliance and prevent a revoked C of O. These funds would be made available if the city has cause to believe (to be defined) that the building owner will not make the required repairs or resolve the unsafe condition in the specified time frame. Costs incurred to the emergency fund will be billed to the property owner through a property tax assessment.</li> <li>e. Develop criteria with the City Attorney's Office, the Office of Financial Services, and DSI to allow for city-initiated Tenant Remedies Actions (TRA). A city-initiated TRA process would allow the city to immediately and directly assist tenants who wish to file a TRA with the court system and expedite code required repairs to a rental property. The current process requires tenants to contact a legal service independently (similar to Southern Minnesota Regional Legal Services) to initiate a TRA.</li> </ul> </li> </ol>

Fair Housing Theme	Recommendation
	<ol style="list-style-type: none"> <li>4. Commercial Vitality Zone Program               <ol style="list-style-type: none"> <li>a. Continue to evaluate the CVZ Program, with a short-term goal of seeing signs of private investment, and long-term goals of growth in tax base, and living wage and career-ladder jobs.</li> <li>b. Evaluate the Program's potential to retain existing residents and businesses, with an aim to prevent displacement.</li> <li>c. Seek funding for two more zones in 2019. Staff is in the process of preparing a recommendation on new zones for 2018.</li> </ol> </li> </ol>
<b>C. Enforcement and Education</b>	<ol style="list-style-type: none"> <li>1. Expand DSI's Landlord 101 to include a specific fair housing module.</li> <li>2. HREEO will schedule a series of landlord trainings in 2018 and explore incentives for participation.</li> <li>3. Further incorporate a plain language focus into Fire Safety documents to create equitable access.</li> <li>4. Coordinate between DSI and HREEO in landlord fair housing education.</li> </ol>
<b>D. Infrastructure to Support Implementation</b>	<ol style="list-style-type: none"> <li>1. Formation of three task forces comprised of community stakeholders, City staff, and policy makers to identify and implement priority policy and program options in each of the three community impact areas ( 1)Preservation and Production of Affordable Housing; 2) Displacement Prevention; and 3) Enforcement and Education).</li> <li>2. Fair Housing Implementation Manager               <ol style="list-style-type: none"> <li>a. Create and fund a Fair Housing Implementation Manager position to begin in 2018.</li> <li>b. Commit ongoing funds for this position in the 2019 budget and thereafter.</li> </ol> </li> <li>3. Develop a multi-year, comprehensive Fair Housing Strategic Plan to align and integrate City resources toward the mission of eliminating housing disparities, lowering barriers to safe, decent, and affordable housing, and ensuring access to economic opportunity in the City of Saint Paul.</li> <li>4. Expand the Interdepartmental Fair Housing Workgroup to include more community stakeholders in order to provide oversight for strategic planning process.</li> <li>5. Community Engagement               <ol style="list-style-type: none"> <li>a. Create a Saint Paul Fair Housing Advisory Commission that would be part of the City's Fair Housing Strategic Planning process and advise on its implementation;</li> <li>b. Provide funds to sustain HREEO's community engagement grants (RFP to be issued late March 2018).</li> <li>c. Adopt and use Equitable Development Scorecard city-wide (see Appendix B.5) as a means to ensure quality community engagement that provides tangible outcomes. Presently PED utilizes a Program/Project Evaluation tool to guide funding decisions at the Resource Team.</li> </ol> </li> </ol>

Fair Housing Theme	Recommendation
	<ul style="list-style-type: none"> <li>d. Leverage existing resources provided to District Councils to include a fair housing engagement requirement in their scope of work.</li> </ul>
	<ul style="list-style-type: none"> <li>6. Fair Housing overview for policy makers which will include information on the Fair Housing Act and how to consider disparate impact and affirmatively furthering fair housing in the decision-making process.</li> </ul>
	<ul style="list-style-type: none"> <li>7. HREEO will issue a fair housing education and community engagement RFP and seek additional funds for expansion.</li> </ul>
	<ul style="list-style-type: none"> <li>8. Continue to update the Fair Housing website as needed to keep the public informed of fair housing activities in the City.</li> </ul>



# Appendices

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## Appendix A: Definitions of Terms

**Fair Housing:** Fair housing is the right to choose housing free from unlawful discrimination. When housing choice is limited, people's access to place-based assets like schools, employment, parks, and other infrastructure may also be limited.

**Affordable housing:** People subject to fair housing protections (because of their protected class status: race, disability, etc) are also disproportionately represented among low-income households that need access to affordable housing. In general, HUD defines affordable housing as housing for which the occupant(s) is/are paying no more than 30% of his/her income for gross housing costs, including utilities.

**Disparate Impact:** Disparate impact is a type of housing discrimination in which a policy that is neutral has a disproportion negative impact on protected classes (race, national origin/ethnicity, familial status, color, sex, disability, religion).

**ACP50 Areas – Map:** Available here:

<https://www.stpaul.gov/sites/default/files/Media%20Root/Planning%20&%20Economic%20Development/ACP50.pdf>

**Gentrification:** Gentrification can be difficult to define precisely, but generally refers to lower-income neighborhoods that are becoming higher-income resulting in rising rents and property values which often including some element of displacement. Current, local research on gentrification is underway at the Center for Urban and Regional Affairs (CURA) - more information is available here: <http://gentrification.umn.edu/>

**Tenant Remedies Actions:** If a property owner has not brought the building into compliance in the timeframe allowed by DSI, Minnesota Law (504B.395) allows for a city, a tenant, a neighborhood housing-related organization, to file a Tenant Remedies Actions in court. A court may decide to prevent the landlord from receiving rents and appoint an administrator to collect the rents in order to pay the administrator costs as well as required taxes, insurance, utilities, and maintenance costs. If a funding pool has covered the costs of the administrator, Landlords are responsible to reimburse for the costs of the administrator.

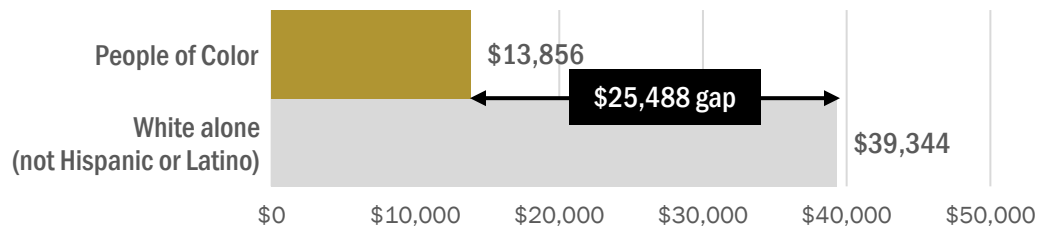
## Appendix B: Supporting Data Analysis

Saint Paul's fair housing efforts take place against the backdrop of a city with profound and persistent socioeconomic disparities. To better understand the City's challenge to ensure a fair and affordable housing marketplace, we begin with three key indicators of these socioeconomic disparities.

Saint Paul is a city of changing demographics. We have evolved from a city that was 64.0% white at the turn of the century to a city that is about 50% people of color today.<sup>18,19</sup>

In Saint Paul, as figure 1 below shows, the income of the average white person is nearly three times as much as the average person of color. To close the gap, the average person of color in Saint Paul would have to see their income rise by \$25,488 annually. As we will see, this gap in income perpetuates other major disparities in the housing sector.

Figure 1. Disparity in Per Capita Income



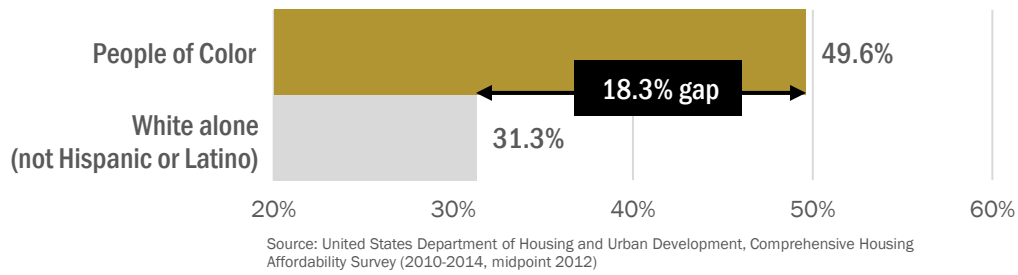
Source: United States Census Bureau American Community Survey, Tables B19301A to B19301I, and Table DP05, 5-year estimates, 2012-2016 (midpoint 2014). Computations by Saint Paul Department of Planning & Economic Development Research Team.

As figure 2 below shows, the average white household is considerably less likely to be housing cost-burdened than households of color. For reference, a household is considered cost-burdened when they spend over 30% of their income on housing costs. People who spend more than 30% of their income on housing find they have little other money for food, transportation, childcare, or education, making it very hard to improve one's financial prospects.

<sup>18</sup> Census Bureau, 2000 Decennial Census, [Table DP1](#)

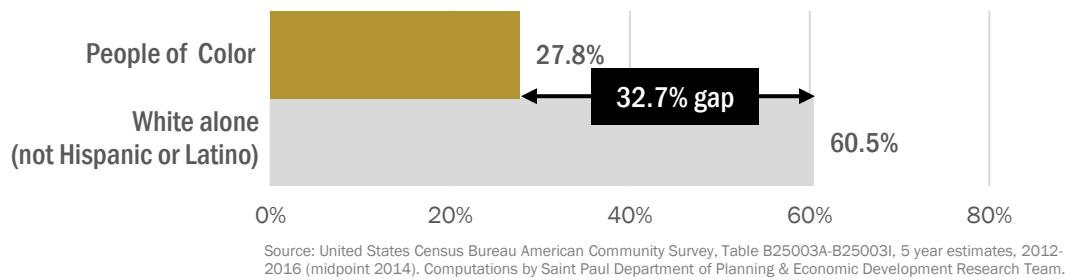
<sup>19</sup> Census Bureau, American Community Survey 1-year estimates, 2005-2016, [Table DP05](#). A linear regression and projection forward of race/ethnicity data suggests Saint Paul became majority people of color in the summer of 2017.

Figure 2. Disparity in Percent of Households that are Housing Cost-Burdened



As figure 3 below shows, the rate of homeownership among households of color would need to more than double to match the rate of homeownership among the white population. Because homeownership tends to be foundational to economic security, the result is that households of color are likely to experience far less economic security than their white counterparts. And so begins a nasty chicken-and-egg conundrum that perpetuates through generations. Without economic security, homeownership is not viable, but homeownership is typically key to economic security.

Figure 3. Disparity in Homeownership

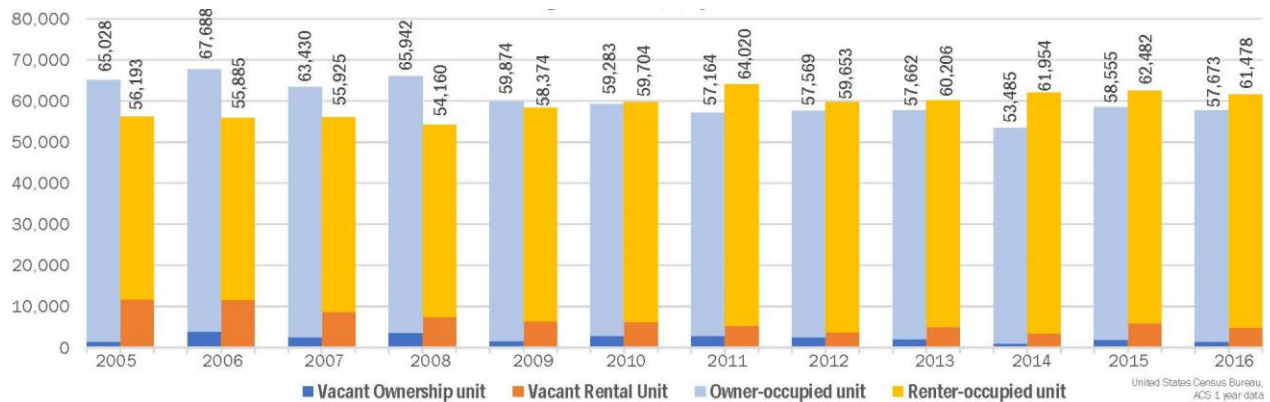


Much of the analysis contained in this report is focused on renters. As the chart above shows, it is important to remember who most of those renters are: people of color, of very modest means. Ensuring fair housing must be a fundamental part of any City plan to achieve true racial equity in Saint Paul.

## Housing profile

Saint Paul has 119,625 units of housing, of which 112,571 are occupied.<sup>20</sup> As figure 4 below shows, over the last few years, we've passed a historic milestone in our housing mix: a slight majority of our housing is now rental. Our housing went from being 45.2% rental at the turn of the century to 50.5% rental in 2016.<sup>21,22</sup> And while our housing supply has remained quite constant, our population has not. Between 2005 and 2016, the total number of units in the city has dropped 2%, at the same time as our total population has increased 15%.<sup>23</sup> Among other factors, this likely reflects a population that is increasingly struggling with housing costs.

Figure 4. Housing Supply in Saint Paul



As Figure 5 below shows, the percentage of households that are cost burdened is generally increasing over time, from 32% of households in 1990, to 37% of households in 2012-2016.

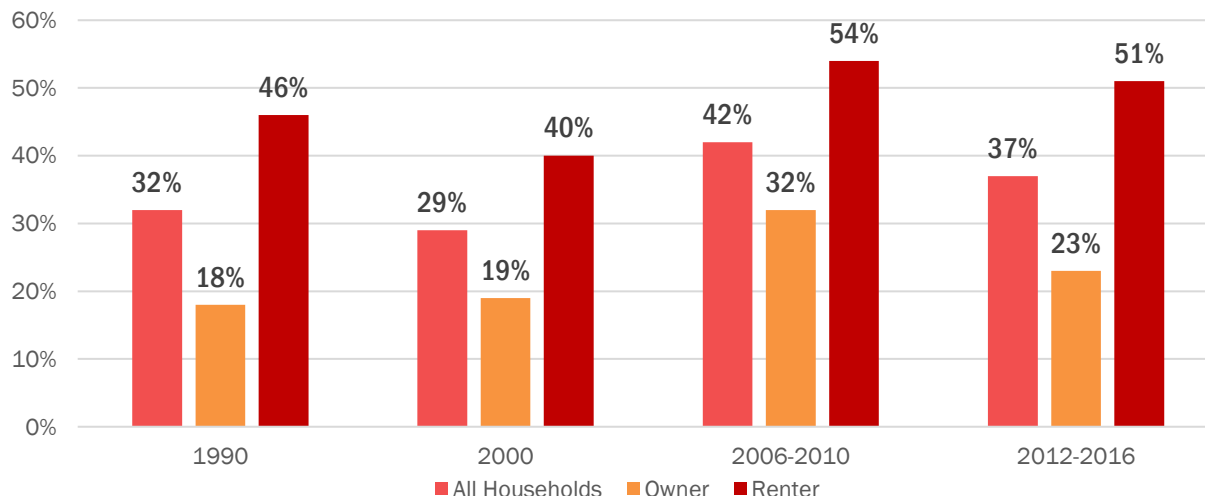
<sup>20</sup> Census Bureau, American Community Survey, 2016, [Table DP04](#)

<sup>21</sup> Census Bureau, 2000 Decennial Census, [Table SF1](#)

<sup>22</sup> Census Bureau, American Community Survey, 2016, [Table DP04](#)

<sup>23</sup> Census Bureau, American Community Survey, 2005-2016, [Table B01003](#)

Figure 5. Percent of Households Experiencing Cost Burden in Saint Paul



Source: Census Bureau, Decennial Census (in single years), and American Community Survey (where a range of years shown).

Understanding the dynamics of our rental market is of particular importance for our efforts around fair and affordable housing in the City. As figure 6 below shows, of the approximately 57,000 rental units in Saint Paul, an estimated 14,782 rental units have formal restrictions limiting them to households earning 80% of the area median income or less.<sup>24</sup> About 4,500 of these affordable units are owned by the Saint Paul Public Housing Agency.<sup>25</sup> The remainder, about 10,000 units, are owned and financed by other entities.

Figure 6. Saint Paul Affordable Housing by Income Bracket and Type of Housing

Income Bracket <sup>26</sup>	Saint Paul PHA Income Restricted <sup>27</sup>	Other Ownership Income Restricted <sup>28</sup>	Naturally Occurring Affordable Housing <sup>29</sup>	Total
≤30% AMI	4,274	2,286	5,000	11,560
>30% & ≤50% AMI	0	1,386	25,354	26,740
>50% & ≤80% AMI	0	6,669	10,411	17,080
≤80% AMI	4,274	10,341	40,765	55,380

<sup>24</sup> HousingLink Streams Data, downloaded 3/13/2018

<sup>25</sup> HousingLink Streams Data, downloaded 3/13/2018

<sup>26</sup> The household income ranges that correspond to the listed percentages of Area Median Income (AMI) are ≤30% AMI: ≤\$25,750; >30% to ≤50% AMI: \$25,751 to \$42,900; >50% to ≤80% AMI: \$42,901 to \$65,700; ≤80% AMI: ≤\$65,700; ≤60% AMI: \$51,480.

<sup>27</sup> Saint Paul Public Housing Agency Website, <http://stpha.org/about-sppha>, accessed 3/23/2018; number published on website confirmed as best available in email correspondence with Al Hester, SPPHA Policy Director, 2/22/2018.

<sup>28</sup> This represents the total number of income-restricted affordable units shown in HousingLink Streams' data, as accessed

<sup>29</sup> This represents the total number of units affordable to those under each of the respective income ranges according to the 2010-2014 CHAS, minus the number of units via HousingLink Streams 3/2018 data that have affordability restrictions in place, including PHA units. These data combine two different datasets, benchmarked several years apart in time, so provide only a general estimate.

As figure 7 below demonstrates, under 30% AMI, there is a pronounced shortage of housing units affordable to people in that price range. The number of housing units priced to serve people at or below 30% of area median income would need to nearly double to meet the demand. By contrast, in terms of hard numbers, there is not a shortage of housing units affordable to people in the other two higher income brackets.

At the same time, we also know there are very real and serious challenges for people in all these income ranges. As figure 7 below shows, many people who could afford higher-cost housing choose to rent at more affordable levels. And why not – it helps them save money. The bulk of the affordable housing stock qualifies as naturally occurring affordable housing; government doesn’t control who chooses to live there. In naturally-occurring affordable housing, these higher-income households are displacing many of the people whose incomes best match that housing price-point. And because of things like credit checks, strict income and credit requirements, disqualification due to past bankruptcies or convictions, and the persistence of discrimination by race, ethnicity, and immigrant status, very frequently these higher-income people have an easier time getting into those units than those who truly need this more affordable housing.

This underscores a core tenet that runs through this report: our need as a community to ensure affordable housing in inextricably woven together with our need to ensure fair housing. The two go hand-in-hand.

Figure 7. Supply and Demand for Saint Paul Rental Housing

<i>Income Bracket<sup>12</sup></i>	<i>Renter Households (2016)</i>	<i>Rental Units (2016)</i>	<i>Supply Gap (-) or Surplus (+)</i>	<i>Allocation Gap: Number of Affordable Units Occupied by Higher Income HH Gap (-)</i>	<i>Total Gap (-) or Surplus (+)</i>
<b>≤30% AMI</b>	22,335	11,560	-10,775	-2,825	-13,594
<b>&gt;30% &amp; ≤50% AMI</b>	11,940 <sup>30</sup>	26,740 <sup>17</sup>	+14,800	-9,505	+5,295
<b>&gt;50% &amp; ≤80% AMI</b>	9,200 <sup>17</sup>	17,030 <sup>17</sup>	+7,830	-6,360	+1,026
<b>&gt;80% AMI</b>	13,355	3,285	-10,070	N/A	N/A
<b>TOTAL</b>	56,830	58,615	+1,785	N/A	N/A

Finally, figure 8 below shows our existing pool of rental units, rental households with housing production goals Saint Paul has with the Metropolitan Council. The Livable Communities Goals were adopted by the Saint Paul City Council in 2010 as a condition of participation in the Livable Communities Act grant funding program. The unit allocations shown at the far right of the table are affordable units the Met Council

<sup>30</sup> While the supply of housing exceeds the number of renters in each income bracket, in units which are not income-restricted, the renters who most need the housing are frequently outcompeted for these units by wealthier renters. Because of things like credit checks, strict income and credit requirements, disqualification due to past bankruptcies or convictions, and the persistence of discrimination by race, ethnicity, and immigrant status, very frequently these higher-income people have an easier time getting into those units than those who truly need this more affordable housing. For more discussion of these dynamics, see pp. Appendix B of this report.

requires Saint Paul to plan for between 2021 and 2030 as part of our 2040 Comprehensive Plan Update. These numbers should continue to help guide the range of investments the City makes in affordable housing.

Figure 8. Saint Paul Affordable Rental Housing Production and Goals

<i>Income Bracket<sup>12</sup></i>	<i>Renter Households (2016)</i>	<i>Rental Units (2016)</i>	<i>Livable Communities Goals (2011 to 2020)</i>	<i>Units Built (2011 to 2017)<sup>31</sup></i>	<i>Met Council Unit Allocation (2021 to 2030)<sup>32</sup></i>
<b>≤30% AMI</b>	22,335	11,560			832
<b>&gt;30% &amp; ≤50% AMI</b>	11,940 <sup>33</sup>	26,740 <sup>33</sup>			128
<b>&gt;50% &amp; ≤80% AMI</b>	9,200 <sup>33</sup>	17,030 <sup>33</sup>			1,013
<b>≤60% AMI</b>			2,625	1,721	

<sup>31</sup> City of Saint Paul Affordable Housing Database

<sup>32</sup> Saint Paul-specific planning goal required by Met Council for inclusion in 2040 Comprehensive Plan Housing Chapter

<sup>33</sup> While the supply of housing exceeds the number of renters in each income bracket, in units which are not income-restricted, the renters who most need the housing are frequently outcompeted for these units by wealthier renters. Because of things like credit checks, strict income and credit requirements, disqualification due to past bankruptcies or convictions, and the persistence of discrimination by race, ethnicity, and immigrant status, very frequently these higher-income people have an easier time getting into those units than those who truly need this more affordable housing. For more discussion of these dynamics, see pp. Appendix B of this report.

## Appendix C: Recommended Resources

1. AI Addendum:  
<https://www.ramseycounty.us/sites/default/files/Projects%20and%20Initiatives/Draft%20III%20Addendum.pdf>
2. Second Judicial District Housing - Court Final Report
3. CURA's Gentrification Study <http://gentrification.umn.edu/>
4. HOMELine Section 8 Study
5. Equitable Development Principles and Scorecard: <http://thealliancetc.org/wp-content/uploads/2016/06/EquitableDevelopmentScorecard.pdf>
6. "Kept out: How banks block people of color from homeownership." MPR News, February 15, 2018. <https://apnews.com/ae4b40a720b74ad8a9b0bfe65f7a9c29>
7. "Report Updates landmark 1968 racism study, finds more poverty and segregation." MPR News February 27, 2018. <https://www.mprnews.org/story/2018/02/28/npr-report-updates-landmark-1968-racism-study>
8. Responsible Banking in the Twin Cities, Dr. Sam Myers.  
[https://drive.google.com/drive/folders/0B2L0\\_Tafp1oBTVFJMEtZc2M3QzQ](https://drive.google.com/drive/folders/0B2L0_Tafp1oBTVFJMEtZc2M3QzQ)
9. ACP50 Map:  
<https://www.stpaul.gov/sites/default/files/Media%20Root/Planning%20&%20Economic%20Development/ACP50.pdf>
10. *Sold Out* Report published by the Minnesota Housing Partnership:  
<https://www.mhponline.org/publications/sold-out>