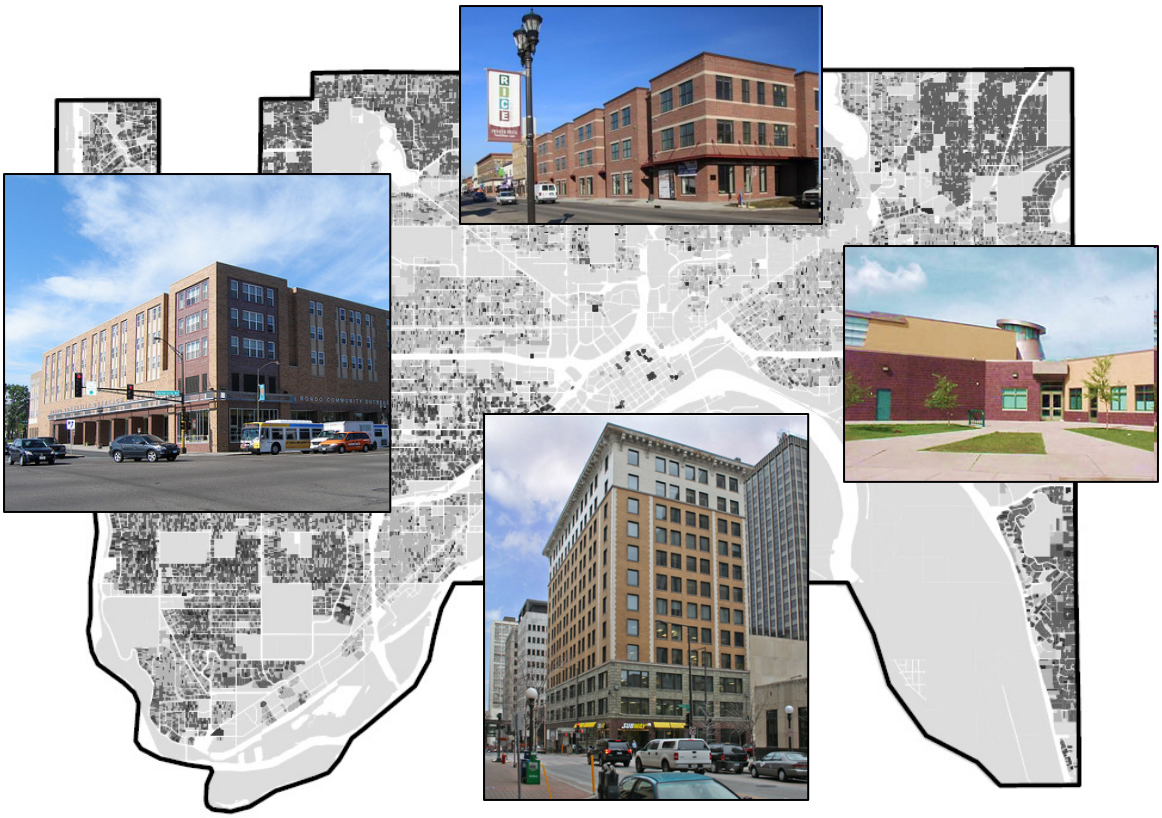
The City of Saint Paul, Minnesota



Consolidated Plan and Submission 2010-2014

Approved for submittal by City Council Resolution # 10-320

The Saint Paul Consolidated Plan and Submission is a five-year planning and implementation document. It was prepared in consultation with the community and in accordance with the requirements of the U.S. Department of Housing and Urban Development. Included is program information on Saint Paul's Fiscal Year 2010:

- ☑ Community Development Block Grant Program
- ☑ Home Investment Partnership Program
- ☑ Emergency Shelter Grant Program

The City of Saint Paul, Minnesota

Consolidated Plan and Submission, 2010-2014

Section	Table of Contents	Page #
	Letter from Mayor Christopher Coleman	
	Federal SF424 Application Forms	
	Executive Summary	1
§91.100	**Consultation Process**	8
§91.105	Citizen Participation	10
§91.200	**General**	16
§91.200(a)	Lead Entity	16
§91.205	**Housing & Homeless Needs Assessment**	17
§91.205(a)	Housing Needs Assessment	17
§91.205(b)	Homeless Needs Assessment	34
§91.205(c)	Special Needs – Not Homeless	45
§91.205(d)	Lead-based Paint Hazards	53
§91.210	**Housing & Market Analysis**	55
§91.210(a)	General Characteristics	55
§91.210(b)	Public and Assisted Housing	65
§91.210(c)	Homeless Facilities and Services	70
§91.210(d)	Special Needs Facilities and Services	79
§91.210(e)	Barriers to Affordable Housing	90
§91.215	**Strategic Plan**	92

§91.215 (a)	**General**	92
§91.215(b)	Affordable Housing	92
§91.215(c)	Homelessness	103
§91.215(d)	**Other Special Needs**	**106**
§91.215(e)	Non-Housing Community Development Plan	108
§91.215(f)	Barriers to Affordable Housing	111
§91.215(g)	Lead-based Paint Hazards	113
§91.215(h)	Anti-Poverty Strategy	115
§91.215(i)	Institutional Structure	116
§91.215(j)	Coordination	120
§91.215(k)	Public Housing Resident Initiatives	120
§91.215(l)	Performance Measurements	121
§91.220	**Action Plan**	122
§91.220(b)	Resources	122
§91.220(c)	Annual Objectives	123
§91.220(d)	Activities	127
§91.220(e)	Outcomes	127
§91.220(f)	Geographic Distribution	161
§91.220(g)	Affordable Housing Goals	162
§91.220(h)	Public Housing	163
§91.220(i)	Homeless and Other Special Needs	163
§91.220(j)	Other Actions	164
§91.220(k)	Program Specific Requirements	165
§91.230	Monitoring	165

Appendices

A. HOME Resale – Recapture Guidelines
B. Program Certifications
C. City Council Resolution

City of Saint Paul, Minnesota
2010 - 2014 Consolidated Plan
Executive Summary

Background

This document is the 2010-2014 Consolidated Plan for the City of Saint Paul, Minnesota, to be submitted to the U. S. Department of Housing and Urban Development (HUD). The five-year plan portion of the document covers the period of 2010 through 2014, and the one-year Action Plan is for the 2010 program year. The Action Plan includes the City's application for 2010 Community Development Block Grant (CDBG) funding, which the City uses to invest in housing, public improvements, economic development, public services, and job creation activities. Saint Paul also receives HOME Investment Partnership Program (HOME) funds to assist in the provision of long-term, safe and affordable housing, as well as Emergency Shelter Grant (ESG) funding, which provides housing opportunities for homeless persons.

This document will be submitted to HUD by April 15, 2010, which is forty-five days before the City's June 1, 2010 program year begins. The City anticipates receiving $8,645,504 of CDBG funding, $2,434,542 of HOME funding, and $350,982 of ESG funding from HUD in 2010. In addition, the City estimates using about $404,496 in CDBG program income.

Plan Development

The development of the 2010-2014 Consolidated Plan included consultation with an array of both public and private sector groups, nine specific Consolidated Plan meetings, and the review of a large amount of research documentation.

The following groups were consulted by staff completing the plan:

- The City of Saint Paul Departments (City Attorney's Office, City Council Research, Financial Services, Fire & Safety, Human Resources, HREEO, Libraries, Mayor's Office, Technology & Communications, Parks and Recreation, Police, Public Works, Planning and Economic Development, Regional Water Services, Safety and Inspections)
- City of Saint Paul Housing Comprehensive Plan Task Force (real estate, housing policy professionals, neighborhood representatives, and housing advocates)
- Saint Paul Capital Improvement Budget Committee - subcommittee
- City of Saint Paul District Councils (17 Community Organizations)
- Minnesota Department of Employment and Economic Development
- Housing, Community Works, and Transit of Hennepin County
- Metropolitan Council
- Minnesota Housing
- Public Housing Agency of Saint Paul
- Ramsey County Community Human Services
- Ramsey County Continuum of Care Coordinator
- Ramsey County Public Health (Lead-Based Paint Division)
- Ramsey County Community and Economic Development (HRA)
- Saint Paul Community Development Corporations
- Wilder Foundation – Housing Division

The following Consolidated Plan meetings which focused on identifying needs and priorities were held on the following dates with the following groups:

- Jan 13 & 27, 2010 Saint Paul Housing and Redevelopment Authority board
- January 16, 2010 Housing Task Force of the Comprehensive Plan (email input)
- January 27, 2005 Ramsey County Community Human Services and Community & Economic Development staff
- January 29, 2010 Wilder Foundation Housing Division staff
- January 29, 2010 Minnesota Multi-Ethnic Chambers Joint Council
- February 10, 2010 Saint Paul District Council/Executive Director Staff
- February 11, 2010 Saint Paul Community Development Corporations
- Jan.-Feb., 2010 Saint Paul PED Housing and Planning Staff
- February 25, 2010 Saint Paul Capital Improvement Budget Committee subcommittee

The following documentation was reviewed by staff completing the Plan:

- U.S. Census data
- 2008 American Community Survey data
- 2009 CHAS / Consolidated Plan dataset
- GVA Marquette Advisors data on apartment trends
- Housing and Redevelopment Authority of Saint Paul Budget
- HousingLink
- Public Housing Agency Annual Report
- Public Housing Agency of Saint Paul Five Year Plan
- Saint Paul Area Association of Realtors
- Saint Paul Capital Improvement Budget
- Saint Paul Comprehensive Plan
- Saint Paul Housing Scorecard
- Saint Paul Parks and Recreation Plan
- Saint Paul Registered Vacant Building List
- Minnesota Aids Project
- Minnesota Department of Health website (for populations with chemical dependency, mental illness, physical disabilities, developmental disabilities, and HIV/AIDS)
- Minnesota Housing Partnership data
- Ramsey County GIS data
- Ramsey County Continuum of Care
- Regional Multiple Listing Service
- Wilder Research Center's *Building Communities Where Older Adults Thrive: Research Summary on a Survey of older adults in Ramsey County report*
- *Overview of Youth and Young Adult Homelessness in Minnesota, Facts and Analysis of Data from the 2006 Statewide Study*, Wilder Research Center (June 2008)
- Wilder Research Center's *Homeless in Minnesota 2006: At a glance. Youth and Young Adults on Their Own*. (November 2008)
- Wilder Research Center's *Counting on Shelter – Emergency Housing Use in Ramsey County, 2006 and 2007 report*
- Wilder Research Center's *Emergency Shelters, Transitional Housing, and Battered Women's Shelter*, Ramsey County Data Collection Project, Thirteenth Annual Report (2004)
- Wilder Research Center's *Overview of Homelessness in Minnesota 2006* (2007)

- Women's Advocates Annual Report (2008)

Plan Organization

The Consolidated Plan is a five-year planning document that is organized into the following four main components: (1) **Housing and Homeless Needs Assessment**; (2) **Housing and Market Analysis**; (3) **Strategic Plan**; and (4) **Action Plan**. Below is a brief overview of the major areas included in each of the sections.

Housing

After experiencing growth through the 1990s and mid-2000s, Saint Paul's population has stabilized in the last five years, with the Metropolitan Council estimating a total population of 287,151 in 2008. Much of the change has been attributed to the increase in populations of color and immigrants. The City continued to experience mild decreases in its senior population (65 years and older) and white populations. Regrettably like many other US cities, Saint Paul's households and neighborhoods have been gravely affected by the vacant housing and mortgage foreclosure crises of the past three years.

The availability of safe and decent housing affordable to households that earn low or modest wages is critical to both the economic health of the City and the welfare of those households and their neighborhoods. Despite the millions of dollars of continued public and private investment, the affordable housing needs in Saint Paul continue to grow. Persistent unemployment, stagnant wages, the continued failure of unsustainable mortgages, funding cuts at all levels of government, high housing cost burdens, and continued deterioration of the housing stock are all contributing factors.

In January and February 2010, the City conducted a survey of residents to gather information regarding housing and community development needs and priorities for the following income categories: less than or equal to 30 percent of the Area Median Income (AMI), considered very low income; 31 percent to 50 percent of the AMI (low income); 51 percent to 80 percent of the AMI (moderate income), and above 80 percent of the AMI (middle and upper incomes). Below are some of the housing needs and priorities revealed in the survey or indicated by data (principally the 2009 CHAS dataset):

- The City estimates that it has approximately 46,000 households with an unmet housing need (primarily cost burden, and to a lesser extent, overcrowding), constituting 43 percent of the City's total number of households.
- There are broad, unmet housing needs for all types of low and moderate income rental and owner households in Saint Paul.
- Generally, the need among low-moderate income rental households is larger: 31,000 rental households have an unmet need, compared to 15,000 owner households.
- The greatest rental needs are among those with the lowest incomes, especially 0-50 percent of AMI.
- The greatest homeowner needs are among those with moderate incomes. This is consistent with the data as well as with policy in the City's Housing Chapter of the Comprehensive Plan.
- Because of data indicating large needs among elderly homeowners between 0-50 percent of the AMI and because of the fact that many are on fixed incomes, these needs are high priorities.
- Housing needs for special needs populations are high priorities.
- The need to preserve (including rehabilitation of) the City's existing publicly-assisted affordable housing for incomes less than or equal to 80 percent of AMI.

- The need to provide assistance to low and moderate income owner households to rehabilitate their homes, particularly improvements related to greater energy-efficiency.
- The City's overall goal over the next five years is to assist 1,825 households using CDBG, and HOME funds (including homeownership assistance), and to serve 7,100 individuals with supportive services using ESG and related homeless prevention funds. Some households will be assisted via housing rehabilitation, mortgage foreclosure counseling, or other City or subgrantee programs and services. Households needing affordable rental housing will benefit from activities including housing preservation and/or rehabilitation, and new construction.
- The City's all-incomes housing policy supports options and choices for households at all income levels, including middle and upper-income households (earning above 80 percent of the AMI). Even if unmet needs for households earning 80-95 percent of the AMI are ranked lower priority in this plan, the City will support housing options for this group in other ways, including the use of other funding sources.

To address the unmet housing needs, the City will follow strategies outlined in the Housing Chapter of the Comprehensive Plan, which focuses predominantly on: the preservation and new construction of affordable housing through partnerships with public and private entities, the retrofitting of existing housing for greater energy-efficiency and affordability, mortgage foreclosure prevention programs, and the continuing preservation of supportive housing options and community homeless prevention services.

Homeless

Key trends and statistics related to the problem of homelessness in Saint Paul are identified by homeless service providers, and backed up by data collected on the various subgroups of sheltered and unsheltered people. They include the following:

- The use of adult and family shelters in Ramsey County is at the highest level in 17 years, with more frequent and longer stays (the highest percentage were single adults, especially men)
- 4,091 individuals entered emergency shelters in 2007
- Chronically homeless people, individuals with serious mental illness, and individuals that are chronically chemically-dependent are the largest unsheltered subpopulations of the homeless
- An estimated 135 youth (up to 17 years old) and 270 young adults (ages 17-21 years) are homeless on any given night in Saint Paul
- Families represent over 70 percent of all transitional housing residents

The number of people in shelters - including adult singles, youth, and families - continue to operate at and exceed the capacity of shelters, and a large number of people live outdoors year round. Despite this, the City and County recently provided additional funding for overflow shelter use during the winter of 2009-2010. While the problem is caused by the lack of available affordable housing for those experiencing extreme poverty (more than 50 percent of homeless adults and 70 percent of homeless families cite this as the reason for entering shelters), the lack of non-competitive job skills as well as availability of jobs, the inability of the job-ready to find work, and various disabilities are also factors.

In addition, the overcrowding of the emergency shelters is aggravated by the discharge policies of institutions, hospitals, treatment centers, foster placement programs and correctional facilities. Too many homeless people are discharged without any place to go. The numbers falling into this category have overwhelmed chemical dependency and mental health services currently in place.

Priorities in addressing the needs of the homeless include the following:

- Continuing to use the City's ESG program funds to support the operations of existing emergency shelters, transitional housing for homeless individuals, families, and youth, and supportive services for homeless prevention. This includes City support of the new Housing Crisis Response Center (described more on page 106);
- Continuing City involvement with the Saint Paul/Ramsey County Homelessness Advisory Board, the Funders' Council (to implement *Heading Home Ramsey*), and City leadership of the new Homelessness Prevention and Rapid Re-Housing Program (HPRP); and
- Working with the County's Continuum of Care and other funders to further address unmet needs. While unmet needs exist for additional emergency shelter beds (50 for persons in families with children), as well as transitional housing beds (40 for individuals and 120 beds for persons in families with children), the greatest unmet need is for permanent supportive housing (350 beds for individuals, and 350 beds for persons in families with children). When feasible, the City will continue to make available a portion of Emergency Shelter Grant, HOME, or CDBG funds for the creation of new shelter beds.

Specific strategies for addressing the issues of homelessness are outlined in the *Saint Paul-Ramsey County Five-Year Low Income Housing and Homeless Services Report and Plan* and detailed in §91.215(c) of this plan, including: 1) Helping low-income families avoid becoming homeless; 2) Reaching out to homeless persons to assess their individual needs; 3) Addressing emergency shelter and transitional housing needs of homeless person; and 4) Helping homeless persons make the transition to permanent housing and independent living.

Special Needs Populations

The City is required to analyze the housing needs for persons who are not homeless but require supportive housing, including elderly, frail elderly, persons with disabilities (mental, physical, and developmental), persons with chemical dependency, persons with HIV/AIDS, and persons with limited English-speaking proficiency. Estimates of specific Special Needs populations in Saint Paul are listed below:

- 11,000 individuals with Physical Disabilities
- 7,000 Elderly or Frail Elderly individuals with housing problems
- 5,600 individuals with Severe Mental Illness
- 4,500 individuals with Developmental Disabilities
- 4,300 individuals with Chemical Dependency issues

Overall, persons with special needs continue to report increasing needs for affordable housing, supportive housing, accessible-designed housing, and support services that allow persons to live more independently.

In response, the City's Housing 5000 program produced affordable housing, including 236 units of supportive housing for "hard-to-serve" persons. Still, the demand for affordable housing and affordable supportive housing remains great.

Additionally, the City may evaluate the costs and benefits of accessible-designed and -adapted housing (including less-costly visitability standards) so that more housing in Saint Paul is available for all persons

regardless of abilities. Realistically, the "aging baby-boom" residents will demand more "accessible-designed" housing products. Consequently, the City may support more accessible-designed and -adapted housing options to allow Saint Paul residents to rent or purchase homes with main floor living to avoid losing these residents to other parts of the Twin Cities.

Non-Housing Community Development

Since the inception of the program, the City of Saint Paul has used CDBG funding to address non-housing community development needs which complement all of the housing activities being carried out in the City. These activities help to maintain the City's infrastructure and public facilities, and also augment the public services provided by Ramsey County. CDBG funding is targeted to community development activities which provide benefit to large numbers of low and moderate income persons.

The following non-housing community development needs are considered key priorities in the Consolidated Plan: Employment/Training Services, Health Services, Youth Services, Commercial/Industrial Building Acquisition/Construction/Rehabilitation, Parks/Recreation Facilities, Tenant Landlord Counseling, and Economic Development Assistance to For-Profits. If CDBG funding stays at current levels during the 2010 - 2014 period, the City will continue to fund public facility, public service, infrastructure, economic development, and planning activities.

Questions and Comments

The draft 2010-2014 Consolidated Plan document was made available for public review at all Saint Paul Public Libraries and through the District Council offices. The most up-to-date version is available on the City's website and a hard copy can be received from the Saint Paul Department of Planning and Economic Development during normal business hours.

Questions and/or comments on the Consolidated Plan may be directed to the following PED staff, all of who were part of a team that contributed to the plan:

Joe Collins - 651-266-6020
Bob Hammer - 651-266-6693
Luis Pereira - 651-266-6591
Ron Ross - 651-266-6692

Written comments should be sent to the following address:

Luis Pereira
luis.pereira@ci.stpaul.mn.us
Department of Planning and Economic Development
1200 City Hall Annex, 25 West Fourth Street
Saint Paul, MN 55102

§91.100 Consultation Process

The development of the 2010 Consolidated Plan included consultation with an array of both public and private sector groups, nine specific Consolidated Plan meetings, and the review of a large amount of documentation.

The following groups were either invited to consult or actually consulted by staff completing the plan:

- The City of Saint Paul Departments (City Attorney's Office, City Council Research, Financial Services, Fire & Safety, Human Resources, HREEO, Libraries, Mayor's Office, Technology & Communications, Parks and Recreation, Police, Public Works, Planning and Economic Development, Regional Water Services, Safety and Inspections)
- City of Saint Paul Housing Comprehensive Plan Task Force (real estate, housing policy professionals, neighborhood representatives, and housing advocates)
- Saint Paul Capital Improvement Budget Committee - subcommittee
- City of Saint Paul District Councils (17 Community Organizations)
- Metropolitan Council
- Public Housing Agency of Saint Paul
- Wilder Foundation
- Ramsey County Community Human Services
- Ramsey County Continuum of Care Coordinator
- Ramsey Public Health (Lead-Based Paint Division)
- Ramsey County Community and Economic Development (HRA)
- Saint Paul Community Development Corporations

The following Consolidated Plan meetings which focused on identifying needs and priorities were held on the following dates with the following groups:

- Jan 13 & 27, 2010 Saint Paul Housing and Redevelopment Authority board
- January 16, 2010 Housing Task Force of the Comprehensive Plan (email input)
- January 27, 2005 Ramsey County Community Human Services and Community & Economic Development staff
- January 29, 2010 Wilder Foundation Housing Division staff
- January 29, 2010 Minnesota Multi-Ethnic Chambers Joint Council
- February 10, 2010 Saint Paul District Council/Executive Director Staff
- February 11, 2010 Saint Paul Community Development Corporations
- Jan.-Feb., 2010 Saint Paul PED Housing and Planning Staff
- February 25, 2010 Saint Paul Capital Improvement Budget Committee subcommittee

The following documentation was reviewed by staff completing the plan:

- U.S. Census data
- 2008 American Community Survey data
- 2009 CHAS / Consolidated Plan dataset
- GVA Marquette Advisors data on apartment trends
- Housing and Redevelopment Authority of Saint Paul Budget
- HousingLink

- Public Housing Agency Annual Report
- Public Housing Agency of Saint Paul Five Year Plan
- Saint Paul Area Association of Realtors
- Saint Paul Capital Improvement Budget
- Saint Paul Comprehensive Plan
- Saint Paul Housing Scorecard
- Saint Paul Parks and Recreation Plan
- Saint Paul Registered Vacant Building List
- Minnesota Aids Project
- Minnesota Department of Health website (for populations with chemical dependency, mental illness, physical disabilities, developmental disabilities, and HIV/AIDS)
- Minnesota Housing Partnership data
- Ramsey County GIS data
- Ramsey County Continuum of Care
- Regional Multiple Listing Service
- Wilder Research Center's *Building Communities Where Older Adults Thrive: Research Summary on a Survey of older adults in Ramsey County report*
- *Overview of Youth and Young Adult Homelessness in Minnesota, Facts and Analysis of Data from the 2006 Statewide Study*, Wilder Research Center (June 2008)
- Wilder Research Center's *Homeless in Minnesota 2006: At a glance. Youth and Young Adults on Their Own*. (November 2008)
- Wilder Research Center's *Counting on Shelter – Emergency Housing Use in Ramsey County, 2006 and 2007 report*
- Wilder Research Center's *Emergency Shelters, Transitional Housing, and Battered Women's Shelter*, Ramsey County Data Collection Project, Thirteenth Annual Report (2004)
- Wilder Research Center's *Overview of Homelessness in Minnesota 2006* (2007)
- Women's Advocates Annual Report (2008)

A Public Notice was published in the Saint Paul Pioneer Press on March 2, 2010. This public announced the completion of the Draft Consolidated Plan, gave instructions for reviewing and commenting on the plan, and gave notice of the date/time and location of the public hearing. The draft plan was made available for review at all Saint Paul Public Libraries, and District Council offices. Copies were also available from PED, and the plan was also available on the PED website. A public hearing on the draft Consolidated Plan was held on March 23, 2010 from 3:30 P.M. to 5:30 P.M. at the Rice Street Library, which is located at the corner of Dale Street and University Ave W. The Saint Paul City Council approved the Consolidated Plan and its submission to HUD on April **7**, 2010.

The City did not receive comments from any citizens at the Consolidated Plan public hearing. Furthermore, the City received written comments from the head of a community organization after the public comment period that requested that specific language be included in the plan to allow for CDBG funds to be used for fieldwork such as historic surveys (an eligible planning activity). The City considered this comment while completing the final version of the Consolidated Plan.

§91.105 Citizen Participation

The following section has been written in a question and answer format. For additional information on any topic, please contact the City of Saint Paul Planning and Economic Development Department.

What are HUD's Citizen Participation Plan requirements?
The Department of Housing and Urban Development (HUD) requires jurisdictions which receive its program funds to follow a prescribed set of principles to ensure that community groups and organizations are involved in the planning and expenditure of HUD funds. Saint Paul has had a citizen participatory process since 1966, approximately 30 years before our HUD partners adopted the current requirements. In 1975, Saint Paul expanded its citizen processes with the establishment of District Councils. And for more than a decade, Saint Paul has provided financial and technical assistance to more than 100 neighborhood groups and organizations as part of our on-going commitment to community participation. For HUD purposes, this section of the Consolidated Plan is also available as the city's Citizen Participation Plan.

Saint Paul's Consolidated Plan is a collaboration, and compilation of a number of City-approved plans, programs, and strategies. The largest of these is Saint Paul's 10-Year Comprehensive Plan. This document includes six citywide subject-based plans – Land Use, Transportation, Parks and Recreation, Housing, Historic Preservation, and Water Resources Management, as well as other adopted citywide plans and plans which focus on specific areas of the city. They include the Central Corridor Development Strategy and the Saint Paul Downtown Development Strategy, as well as small area plans, district plans, and special focus plans. Saint Paul's Long Range Capital Improvement Budget and Program is nationally recognized for its grassroots approach to resident involvement in the City's budgeting processes, and is likewise prepared, reviewed, and revised on an annual basis. The Consolidated Plan is approved by the Mayor and City Council prior to submission to HUD.

During the preparation of the FY2010 Consolidated Plan, City staff consulted community-based organizations on various aspects, including: the neighborhood district planning councils, representing the entire city; neighborhood based non-profit agencies; housing and public service providers; numerous advocacy groups; local and regional governmental agencies; public housing providers, neighboring municipalities, and community service providers.

Which programs are affected by the HUD Consolidated Plan?
The Consolidated Plan consists of a five-year needs assessment and planning component, and an annual One Year Action Plan. The Action Plan includes one year funding recommendations for the Community Development Block Grant (CDBG) Program; the Home Partnership (HOME) Program, and the Emergency Shelter Grant (ESG) Program. All awards come from, and are administered through the U.S. Department of Housing and Urban Development.

How much funding is available to the City of Saint Paul?
HUD reports that the City will receive $8,645,504 in CDBG funds, $2,434,542 in HOME funds, and $350,982 in ESG funds in FY 2010. Funding is anticipated to be available on or about June 1, 2010.

What type of activities can be accomplished with the HUD funds?

The CDBG, HOME, and ESG programs are all distinct federal programs, and each has separate rules, regulations, and guidelines. Common through all of these programs is the requirement that the funds be spent on activities which "principally benefit the City's low and moderate income residents". In general, CDBG is used primarily for housing related activities, and activities which support low and moderate income residents and neighborhoods. The HOME program is used exclusively for housing related activities, and the ESG program supports organizations that serve homeless persons, including essential supportive services and homeless prevention activities.

What activities are being funded in 2010?
All CDBG activities being proposed for 2010 have been budgeted as part of the City's 2010 annual budgeting process. HOME and ESG projects and programs are budgeted throughout the City's HUD program year, which begins June 1, 2010, and runs through May 31, 2011.

Does the City ever fund activities through any of these programs which may result in residents and businesses being displaced?
There are currently no activities included in the City's One Year Action Plan which envision any displacement of residents or businesses. Should such an action be contemplated, the City is required to follow all of the federal, state, and local laws relating to relocation and displacement. The City would prepare an individualized plan for the activity, which would include the steps taken to minimize displacement, and include the types and levels of assistance which would be made available. This may include, but is not limited to relocation assistance for moving and related expenses; assistance in purchasing a new dwelling or business location, and a rental subsidy.

Lead-based paint is a serious health issue. How does the City focus on the removal of lead-based paint?
City elected officials and staff continue to implement initiatives which eliminate the health risks associated with lead-based paint. Staff has an ongoing collaboration with the State of Minnesota, Ramsey County Health Department, and for-profit and non-profit community service providers to ensure that the risks associated with lead-based paint are mitigated.

Does the City partner with other communities and jurisdictions?
The City of Saint Paul is one of 19 municipalities located within Ramsey County, and represents approximately 40 percent of the county's land area. Ramsey County is the lead human service agency in all these jurisdictions. The City works closely with Minneapolis, the Funder's Council and the Interagency Stabilization Group.

Both Saint Paul and Ramsey County participate in the Community Development Block Grant (CDBG) program, and consistently keep each other informed in all areas of the program, including non-housing community development needs. This includes ongoing communication and dialogue, and collaborations in the delivery of health care, senior services, and youth employment programs.

Saint Paul continues to participate in an Inter-jurisdictional group of adjacent public agencies to share knowledge, strategies, and planning efforts. Established a number of years ago, the City also actively participates in the activities of the Metropolitan Council, the state authorized agency charged with planning activities in the greater metropolitan area of Saint Paul, Minneapolis, Bloomington, and surrounding cities and counties.

Does the Paul Public Housing Agency participate in Consolidated Plan process?
The Saint Paul Public Housing Agency (PHA) is the principal provider of housing assistance to the City's low and moderate income persons. In Saint Paul, the PHA is a separate legal entity, and not a part of City government.

Unlike the PHA, the City of Saint Paul does not own, nor provide housing. The City works very closely with the PHA to develop housing goals, strategies, and program implementation. This close relationship is based on mutual goals, staff cooperation, joint planning and program development.

The PHA is required to prepare its own Five-Year Plan, and each agency reviews the others for consistency.

How can residents become involved in initiatives like the Consolidated Plan?
Saint Paul provides opportunities to become involved in virtually every plan, program and project undertaken in the City. This includes the Consolidated Plan, the Capital Budget process, the District Council Planning processes, The Annual Housing Plan, Ramsey County\Saint Paul Homelessness Plan, and neighborhood small area plans.

Saint Paul's Citizen Participation Plan was last adopted in 1995, and is updated as necessary. Saint Paul has more than 35 years of promoting and actively partnering with community organizations and resident groups.

Saint Paul's Consolidated Plan is exactly what the name says: a composite of a number of the City's adopted plans, policies, and budgetary documents. Each major section has had extensive resident/citizen review, comment, and community input. Any and all changes follow both the City's tradition of resident input, and exceed HUD requirements.

Saint Paul's Capital Budget Process and neighborhood planning activities are designed to encourage participation by all members of the community. Through the neighborhood district councils, Early Notification Systems, the non-profit community, and the publication of notices, and internet sites, the City attempts to reach as many residents as possible.

Approximately 20 years prior to HUD creating citizen requirements, Saint Paul established procedures for residents to have an opportunity to participate in decision making. These mechanisms, including neighborhood review, public notices, resident review through the Capital Budget process, and formal approval exceed all existing HUD requirements.

Those interested in participating in government can volunteer to serve on citizen boards. The City of Saint Paul has more than four dozen citizen committees to which more than 400 people have been appointed over the past three years. These public review committees cover a broad range of topics including public housing, people with disabilities, aging, health, City planning, zoning, homelessness, parks, police conduct, cable TV, airport noise, human rights, historic preservation, capital expenditures, intergovernmental relations and many more. The current administration and City Council continue to focus on making the committees more diverse and representative of the community.

How is the Consolidated Plan assembled?

All of the programs, projects, and activities financed with funds from HUD are budgeted through the City's annual Capital Improvement Budget and Process, Operating and Special Funds Budgets. These processes have extensive input: 1) at the outset with community groups being actively involved with proposing projects; 2) through the multiple citizen reviews; 3) finally with the public hearings and approvals by elected officials. Prior to the adoption of the City's Consolidated Plan, City staff publishes and makes available to residents program information as required by the federal government, and specifically in the format as required by HUD.

Saint Paul's draft Consolidated Plan is available for review and comment in a number or forums and formats. A complete up-to-date document is available for review on the City's website at: http://www.stpaul.gov/index.aspx?NID=3427. Hard copies of the proposed Consolidated Plan were made available at Saint Paul Department of Planning and Economic Development, Saint Paul Public Libraries, and at the offices of the City's District Councils. In addition, a summary of the Consolidated Plan is available online, and was published in the Saint Paul Pioneer Press. Finally, hard copies are available at all times during the program year.

The City publicizes and provides a thirty (30) day period when it receives comments on the Consolidated Plan. The time frame for review of the draft plan is traditionally early March through early April. However, City staff welcomes comments on the Consolidated Plan, and all program documents, at any time during the year.

Saint Paul has, for more than 25 years, provided for participation in its planning and budgets processes. Through the Capital Improvement Budget process, persons are notified through publications, community groups, the City's Early Notification List, and through the District Council process. This process spans six months, and during that time there are multiple public hearings at as many as five different participatory levels. In addition, City staff includes an additional public hearings, notifications, and comment periods in support of the HUD program requirements.

As part of the Consolidated Plan process, the City of Saint Paul will complete its draft plan and publish a notice in the Saint Paul Pioneer Press on or before March 15th. Any and all comments received will be considered, and will be incorporated into the final document.

Once the City approves the Consolidated Plan, is it ever changed?
The City of Saint Paul follows very specific criteria for amending its programs and budgets. The requirements are, in fact, more specific than the HUD guidelines in terms of what constitutes a change in the program, and in the changing of funding priorities. A copy of Saint Paul's procedures for preparing and implementing a substantial amendment to the Consolidated Plan is available from City staff.

How do you keep track of performance?
Saint Paul provides notice and opportunity to comment on its program performance in accordance with all federal, state, and local rules and regulations.
The City has participated in, and followed HUD program guidelines involving program performance reporting for more than 25 years. The City routinely publishes a notice in the local newspaper 15 days before the annual performance report is submitted to HUD, and makes the report public. Similar to the Consolidated Plan, the City considers written comments, and a summary of all comments received will be included with the report that is submitted to HUD.

Does the City hold Public Hearings on the Consolidated Plan?
In a typical year, the City of Saint Paul will conduct three or four public hearings on its CDBG program prior to its adoption, and as many additional hearings as required to ensure that all City and HUD requirements are being fulfilled. A public hearing specific to the Consolidated Plan is held annually in late March or early April prior to its submission to HUD.

The City publishes all formal notices approximately 10 days prior to a meeting, hearing, or other type of formal action. Notices for public hearings may also be provided through direct mailings and on the City's website. This conforms to locally-accepted policy.

All public hearings are held in accessible locations, and at times that vary so as to provide for reasonable accommodation to all interested persons. Meetings are generally held in City buildings, or in neighborhood community centers, and at times that are convenient to encourage participation. Saint Paul routinely provides for language and sign interpreters as needed.

Are Consolidated Plan program documents available to the public?
Yes, all program documents are available at all times to the general public. Both City and HUD rules require that public documents be available, and timely access be provided. In cases where there may be confidentiality issues, a clarification will be sought from the City Attorney's Office or HUD staff prior to the release of the requested documents or information.

Does the City provide technical assistance to persons wanting to participate in the City's HUD sponsored programs?
Saint Paul has been nationally-recognized for more than 30 years for its participatory government, and for encouraging and assisting persons wishing to participate in the City's programs.

How does the City handle questions and/or complaints?
Resident involvement is at the core of all City programs, and staff takes all questions, comments, concerns and complaints very seriously. Depending upon the nature of the issue, questions are responded to in as timely a manner as possible, most often with 15 days or less.

What happens with the public comments received?
Typically the City receives a variety of comments on the Consolidated Plan document as well as the individual programs and projects included in the submission; CDBG, the HOME Partnership Program (HOME), and the Emergency Shelter Grant Program (ESG). The City reviews and considers all comments prior to adoption of the Consolidated Plan.

Citizen review and involvement are included in every step of the preparation of the City's Capital Improvement Budget, the City's annual operating budget, and the accompanying planning documents. Public hearings were held on each of the above items by City staff, the Planning Commission, the Capital Improvement Budget Committee, the Mayor, and City Council. In accordance with the Consolidated Plan regulations, Saint Paul includes representatives from federal, state and local government, public and private for-profit and non-profit organizations, human and social service providers.

How do I contact city staff if I have additional questions?

Questions on the Consolidated Plan can be directed to Luis Pereira at 266-6591 or luis.pereira@ci.stpaul.mn.us.

§91.200 General

This document is the 2010-2014 Consolidated Plan for the City of Saint Paul, Minnesota, which will be submitted to the U. S. Department of Housing and Urban Development (HUD). The five-year plan portion of the document covers the period of 2010 through 2014, and the one-year Action Plan is for the 2010 program year. The Action Plan includes the City's application for 2010 Community Development Block Grant (CDBG), HOME Investment Partnership Program (HOME), and Emergency Shelter Grant (ESG) funding. This document will be submitted to HUD by April 15, 2010, which is forty-five days before the City's June 1, 2010 program year begins.

§91.200(a) Lead Entity

The City of Saint Paul *Department of Planning and Economic Development* (PED) is the entity responsible for the development of the 2010-2014 Consolidated Plan. PED, which was established as a City Department in 1977, is responsible for the planning, housing, and economic development activities throughout the city.

§91.205 Housing and Homeless Needs Assessment

§91.205 (a) Housing Needs Assessment

The housing assessment section provides an overview of the current and the projected housing needs over the next five years for residents living in the City of Saint Paul. The demographic data is based on the 1990 and 2000 U.S. Census, 2009 CHAS data reports provided by the U.S. Department of Housing and Urban Development (HUD), various other sources, an online survey, and meetings conducted with various stakeholders throughout the city. The following factors are considered in evaluating and prioritizing the City's housing needs: the number and types of families with housing problems, which include moderate and severe housing cost burdens, overcrowding, and substandard housing; and racial/ethnic groups with disproportionately greater need. In addition, the discussion delineates the identified housing needs by the following income levels[1]: less than or equal to 30 percent of the area median income (AMI) (very low); 31 percent to 50 percent of AMI (low); 51 percent to 80 percent of AMI (moderate); and 80 to 95 percent of AMI (middle income).[2]

Unlike most major cities, the City of Saint Paul's total population has increased modestly over the last fifteen years. In 2000, the total population was 287,151, which was an increase of approximately 5.5 percent since 1990. Growth has slowed more recently, with the Metropolitan Council estimating a total Saint Paul population of 288,055 in 2008.[3]

Like many communities, Saint Paul has also experienced a foreclosure and vacant housing crisis in the past three years. While current data on population loss is difficult to obtain, trend lines help paint the picture (Fig. 1). Many households and neighborhoods have suffered.

Despite the population slowdown and housing crises, minorities have increased proportionately in the last fifteen years.[4] As seen in Figure 2, from 1990 to 2008 the Asian population in Saint Paul increased from 7 percent to 13 percent; the African-American population increased from 7 percent to 13 percent; and the Hispanic population increased from 4 percent to 10 percent. Over the same period, the American Indian population remained stable at 1 percent while the White population decreased significantly from 81 percent to 63 percent.

Saint Paul has also experienced growth in its foreign-born population. The 2008 American Community Survey indicates that 15 percent of the total population living in Saint Paul was foreign-born, which was an 8 percent increase since 1990. Approximately 54 percent of the foreign-born population was born in Asia and 27 percent was born in Latin America. The new residents are attracted to Saint Paul by a wide variety of opportunities including but not limited to, education, safety, employment and housing.

---

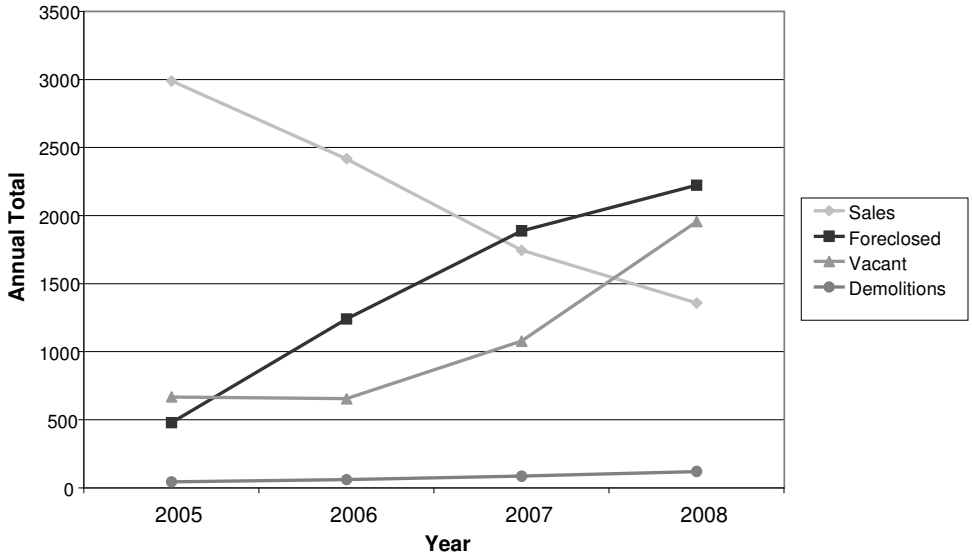
[1] The U.S. Department of Housing and Urban Development (HUD) annually establishes the median income for all parts of the country based on family size of four persons. The FY 2009 Area Median Income (AMI) for a family of four for the Minneapolis - Saint Paul Metropolitan Statistical Area (MSA) is $83,900.

[2] HUD now requires reporting on middle-income households, defined as households earning between 80 and 120 percent of the Area Median Income. Because 2009 CHAS data only includes information on households earning between 80 and 95 percent of AMI, this group is treated as "middle-income" throughout this document.

[3] The American Community Survey estimates that the City of Saint Paul's population dipped to 268,962 in 2008 www.census.gov. The population loss could be explained at least partially by the foreclosure and vacant building crises.

[4] Caution should be used when comparing data by race for years before 1999 with those for 2000 and beyond. In October 1997 standards for data on race and ethnicity were revised by the U.S. Census Bureau. Respondents are now allowed to report one or more races and there are seven instead of five racial tabulation categories.

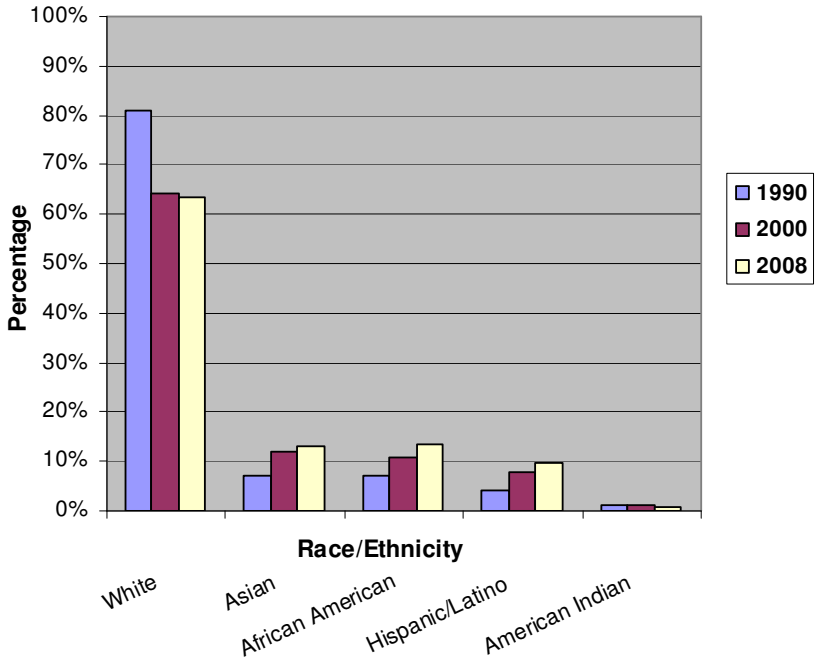
Fig. 1. Summary of citywide housing trends



Source: Ramsey County records

This influx of new residents has changed the face of Saint Paul. The City boasts neighborhoods that speak a variety of different languages. The 2008 American Community Survey states that 23 percent of Saint Paul residents spoke a language other than English at home. Asian languages (50 percent) and Spanish (30 percent) were among the most common.

Fig. 2. Change in Race and Ethnicity, 1990-2008



Source: U.S. Census Bureau, 1990 and 2000, and American Community Survey 2008

In 2008, Saint Paul had 109,044 households of which 51 percent were family households and 49 percent were non-family households. The family types of City households are provided in Figs 3 and 4 below.[5]

Fig. 3. Composition of Saint Paul households – family type and tenure

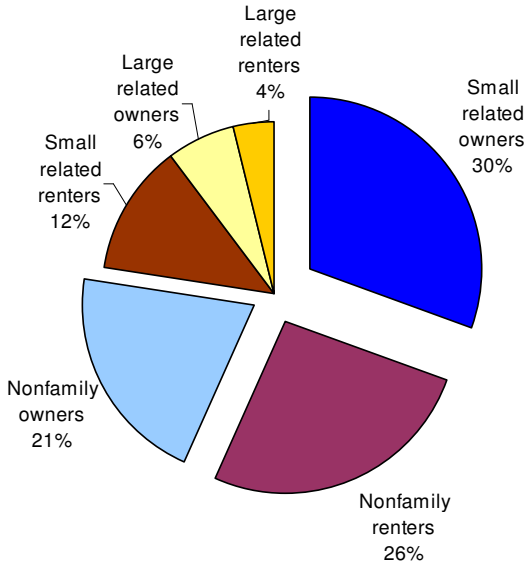


Fig. 4. Saint Paul households by family type, tenure, and housing problems

	Family Type	Total Households	Households with Housing Problems	% Households in Family Type with Problems
Renters	Large related	4,170	3,740	**90%**
	Nonfamily	28,050	13,345	**48%**
	Small related	13,145	6,245	**48%**
	Subtotal	45,365	23,330	51%
Owners	Large related	6,925	3,545	**51%**
	Nonfamily	22,305	9,140	**41%**
	Small related	32,645	8,455	**26%**
	Subtotal	61,875	21,140	34%
	Total	107,240		

Fig. 4 above shows that 90 percent of large related renter households (defined by CHAS as having five or more family members) experienced housing problems. In addition, about half of all nonfamily and small related renter households, as well as half of all large related owner households had housing problems.[6] Finally, according to Table 4 of the 2009 CHAS dataset, of the 10,430 single parent households in Saint Paul, 62 percent experienced housing problems.

As shown in Fig. 5 below, over 3,000 rental households experience either moderate or severe overcrowding in Saint Paul, 300 of which have two or more families in the household. While this constitutes only 6.7 percent of all rental households, it is a proxy for the number of families with a higher risk of homelessness. About 1,930 owner households experience overcrowding, 315 of which have two of more families in the household. This constitutes 3.1 percent of all homeowner households in Saint Paul.

[5] Source of the data is Table 4 of the 2009 CHAS/Consolidated Plan dataset.

[6] Consolidated Plan requirements also include an assessment of the housing needs for single person households. While the CHAS 2009 dataset does not include an exact tabulation on single persons, single persons are a key subset of nonfamily households.

Fig. 5. Households Experiencing Moderate or Severe Overcrowding

		Moderate or Severe Overcrowding				All Households	Percent of all households experiencing overcrowding (moderate or severe)
	Percent of Area Median Income	2+ family household	1-family household	Non-family household	**Total households**		
Renters	0-30%	95	1,595	0	1,690	17,780	10%
	31-50%	70	580	0	650	8,780	7%
	51-80%	120	415	0	535	9,520	6%
	81-95%	15	25	0	40	2,905	1%
	>95%	0	90	20	110	6,400	2%
Owners	0-30%	15	270	0	285	5,040	6%
	31-50%	30	265	0	295	6,705	4%
	51-80%	115	570	0	685	13,335	5%
	81-95%	45	230	15	290	6,055	5%
	>95%	110	190	75	375	30,645	1%

Source: Table 10, 2009 CHAS dataset

Elderly

Over the last decade the City has experienced a departure of some of its senior (65 years and older) population. The U.S. Census estimates that from 1990 through 2000 the number of Saint Paul seniors decreased by 21 percent to 29,647, and the trend continued through 2008, with the number of seniors declining to 26,380. Some seniors prefer housing that has less yard space, limited maintenance duties, and increased security, all features associated with apartments, condominiums, townhomes, and/or cottage style homes.

Fig. 6. Elderly Renter Households with Housing Problems

	% Area Median Income	Elderly	Extra-Elderly	**Total**
Renters	0-30%	1,035	1,160	2,195
	31-50%	485	550	1,035
	51-80%	180	260	440
	80-95%	20	15	35
	95% and above	0	20	20
	All elderly renters with Housing Problems	1,720	2,005	3,725

Source: CHAS 2009, Table 5. There were an estimated 6,800 senior renter households in 2009. "Elderly" include seniors between 62-74 years old; "Extra-Elderly" include seniors 75 years or older.

The vast majority of seniors choose to stay in their single family homes. Many are struggling to keep up with routine maintenance. The 2009 CHAS dataset estimates that approximately 41 percent (9,900) of Saint Paul's senior households had estimated annual incomes below $42,000 (50 percent of the AMI). According to the 2008 American Community Survey, 13.5 percent of people over age 65 percent had

incomes at or below the poverty level, and 39 percent had a disability. According to Fig. 6 above, 55 percent of senior renter households experience housing problems, and 26 percent of senior homeowner households experience housing problems.

Fig. 7. Elderly Owner Households with Housing Problems

	% Area Median Income	Elderly	Extra-Elderly	**Total**
Owners	0-30%	700	805	1,505
	31-50%	605	535	1,140
	51-80%	475	210	685
	80-95%	160	75	235
	95% and above	440	60	500
	All elderly owners with Housing Problems	2,380	1,685	4,065

Source: CHAS 2009, Table 5. There were an estimated 15,575 senior homeowner households in 2009. "Elderly" include seniors between 62-74 years old; "Extra-Elderly" include seniors 75 years or older.

Housing Cost Burden

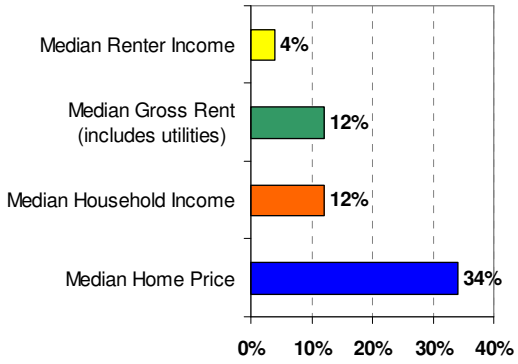
Since the submission of the 2005 Consolidated Plan, housing costs have continued to increase. According to a study entitled "Need on the Rise: Housing Trends in Minnesota" by the Minnesota Housing Partnership, Minnesota was the state with the fastest growth in severely cost burdened households of any state in the nation.[7] HUD defines housing as unaffordable or a cost burden if the household spends more than 30 percent of gross income (this includes rent or mortgage, utilities, taxes and insurance)[8]. Generally, when lower income households spend more than 30 percent of their income on housing, they do not have enough income for other living expenses such as food, transportation, and child care.

Recent analysis by the Minnesota Housing Partnership found the median home price in Minnesota in 2008 was $189,000, while the median rent was $734/month.[9] These costs demand a household income of $60,418 to purchase the median-priced home, or $29,360 to rent the median-priced apartment. People earning the median wage in several essential service occupations could not afford this median rent in 2008, including food prep worker, cashier, child care worker, nursing aide, or office clerk. Still others, such as middle school teacher, could not afford the median priced home. Among 7 selected essential service and common occupations at median wage levels, only two (registered nurse and middle school teacher) could afford a median-priced apartment in Minnesota in 2008.

The 2008 median household income in Saint Paul was $45,831 (a decrease of 5.5 percent since 2000, adjusted for inflation). Unfortunately, median household incomes in Minnesota have not kept pace with median housing prices; similarly, median household incomes of renter households have fallen behind median gross rents.

[7] Minnesota Housing Partnership website, accessed 1/11/10, www.mhponline.org/files/MHP_Housing_Trends_Summary_2008.pdf
[8] U.S. Department of Housing and Urban Development. www.hud.gov
[9] Housing Facts for Minnesota Advocates, Minnesota Housing Partnership, analysis accessed on 2/17/10 at www.slideshare.net/FollowMHP/housing-facts-for-advocates-jananuary-2010.

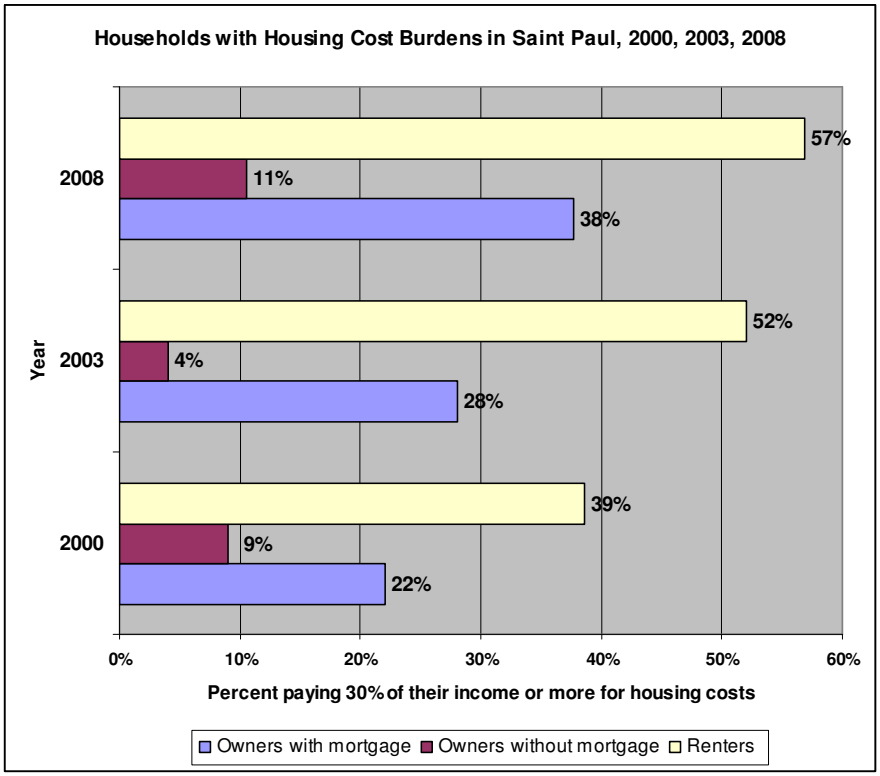
Fig. 8. Percent Increase in Housing Costs and Income, 2001-2007, Minnesota



Source: Minnesota Housing Partnership

Many low and moderate income residents in Saint Paul continue to pay more than 30 percent of their income on housing, despite the mortgage foreclosure crisis of the past few years. As seen in Figure 9, 38 percent of owners with mortgages, 11 percent of owners without mortgages, and 57 percent of renters in Saint Paul spent 30 percent or more of their income on housing in 2008.

Fig 9. Households with Housing Cost Burdens in Saint Paul.[10]



According to 2008 American Community Survey data for Saint Paul, the median monthly owner cost for housing units with a mortgage was $1,527, the median monthly owner cost for housing units without a mortgage were $462, and the median monthly rental cost for a rental unit was $704.[11]

[10] Tables 69 and H94, SF3, Census 2000; ACS 2008.

Saint Paul Household Incomes and Overall Needs

According to HUD, the 2009 AMI for the Minneapolis-Saint Paul Metro Area for a family of four was $83,900. Figure 10 identifies household income categories in Saint Paul as a percentage of the AMI. The 2009 Consolidated Plan/CHAS dataset indicates that 21 percent of Saint Paul households had incomes less than 30 percent of the AMI; this is the largest and only income category that gained households. Other low and moderate income categories maintained a similar share of Saint Paul's households compared to the 1990-2000 period: 14 percent had incomes between 31 and 50 percent of the AMI; 21 percent had incomes between 51 and 80 percent of the AMI; and 43 percent had incomes at or above 80 percent of the AMI.

Fig. 10. Percentage of Households by Income Category

Household Income Categories	1990	1990 percent of total	2000	2000 percent of total	2009*	2009 percent of total
<=30% of AMI	20,357	18%	20,714	18%	22,820	21%
31-50% of AMI	15,276	14%	16,968	15%	15,485	14%
51-80% of AMI	23,164	21%	24,216	22%	22,855	21%
>80% of AMI	51,452	47%	50,211	45%	45,995	43%
Total Households	110,240	100%	112,109	100%	107,155	100%

Sources: US Census, 1990 and 2000; *2009 CHAS dataset

In January and February 2010, the City conducted an online survey of Saint Paul residents and organizations that provide housing opportunities and business services to City residents to determine their thoughts on the City's housing and community development needs. The survey asked respondents to rank the importance of various approaches to addressing overall needs of low and moderate income people, affordable and homeless/supportive housing needs, as well as community development needs. Respondents identified their household incomes in the following categories, as required by HUD:

- Less than or equal to 30 percent of the AMI (Households earning up to $24,250);
- Between 31 percent to 50 percent of the AMI (Households earning between $24,250 and $41,950);
- Between 51 percent to 80 percent of the AMI (Households earning between $41,950 and $64,000); and
- Between 81 percent to 95 percent of the AMI (Households earning between $64,000 and $100,680).

Sixty-one percent of the survey respondents were low and moderate income individuals (31 percent were middle income or above). Low and moderate income households (0-80 percent of AMI) prioritized the following overall needs, in terms of housing and community development, as most important:

[11] Notably, while median owner costs have increased substantially since the last Consolidated Plan, the median rental cost has remained about the same (hovering around $700 since 2003).

Fig. 11. Survey Results, Overall Housing & Community Development Needs, Low and Moderate Income Saint Paul Residents, 2010-2014

	Priority ranking given by:	
Housing & Community Development Need:	**Households at 0-80% of AMI**	**All households**
Housing rehabilitation assistance for low-moderate income homeowners, including ways to increase home energy efficiency.	1	2
Economic development, including job training and small business development.	2	1
Housing and services for underserved groups including homeless and people with special needs (the elderly, persons with disabilities, persons with alcohol or drug addiction, persons with HIV/AIDS and their families, and public housing residents).	3	3
Inadequate supply of affordable rental housing.	4	4
Community development, including but not limited to youth services, and assistance to households in managing finances	5	5
Fair Housing and housing discrimination.	6	6

Notes: 15 respondents had incomes between 0-30% of AMI; 15 respondents had incomes 31-50% of AMI; and 20 respondents had incomes between 51-80% of AMI. The Survey on Needs of Low and Moderate Income St. Paul Residents was conducted on SurveyMonkey.com from Jan. 2, 2010 through Feb. 24, 2010.

It is clear that regardless of income, survey respondents felt that housing rehabilitation assistance, job training and economic development, and housing and services for vulnerable populations with special needs are priorities for the City of Saint Paul. More detailed survey results are shown in Fig. 13 below.

Fig. 12 below breaks down Saint Paul households by tenure, income, and particular housing problems. The following subsections discuss the specific housing needs of each income cohort as well as the housing priorities indicated in the survey.

Incomes less than or equal to 30 percent of AMI (Very Low Income)

Residents that have incomes less than or equal to 30 percent of the AMI are considered very low income. Residents in this category are usually on public assistance, characterized as working poor, recent immigrants and/or paying more than 30 percent of their income on housing.

According to Fig. 12 below, 85 percent of renter households with incomes less than 30 percent have housing problems (15,145), representing the City's highest concentration of housing problems for any household income level or type. The vast majority of these renter households are severely cost-burdened.[12] While there are many fewer owner households at 0-30 percent of AMI that have housing problems (4,275), problems are also highly concentrated among this group (85 percent), with many households experiencing severe cost burdens. The number of households at 0-30 percent of AMI that have a moderate cost burden[13] is not as significant in magnitude. As shown above in Figures 6 and 7, a

[12] Severe housing cost burden occurs when mortgage or rent payments exceed half of a household's total income.

[13] Moderate housing cost burden occurs when mortgage or rent payments exceed thirty percent of a household's total income.

high portion of elderly (and extra-elderly) renter households in this income category and a moderate proportion of owner households have housing problems (representing 59 percent of all elderly renters with housing problems, and 37 percent of elderly renters with housing problems, respectively).

Fig. 12. Saint Paul Households by Income Limits, Tenure, and Housing Problems (Needs)

	Households with Housing Problems (Needs)								
Renters	Percent of Area Median Income	Cost Burdened	Severe Cost Burdened	Over-crowding	Severe Over-crowding	No Income or No Cash Rent	Sub-standard	**Subtotals (Households with Housing Needs)**	Totals Households (income category)	% Households in income category with Needs
	0-30%	2,065	10,020	1,275	420	1,070	295	15,145	17,780	85%
	31-50%	4,360	1,480	400	250	110	40	6,640	8,780	76%
	51-80%	1,655	220	390	150	155	35	2,605	9,520	27%
	81-95%	95	0	30	10	60	20	215	2,905	7%
	>95%	20	0	90	20	250	0	380	6,400	6%
	All renters	8,195	11,720	2,185	850	1,645	390	24,985	45,385	55%
Owners	Percent of Area Median Income	Cost Burdened	Severe Cost Burdened	Over-crowding	Severe Over-crowding	No Income or No Cash Rent	Sub-standard	**Subtotals (Households with Housing Needs)**	Totals Households (income category)	% Households in income category with Needs
	0-30%	855	2,940	240	30	195	15	4,275	5,040	85%
	31-50%	1,630	2,295	155	140	0	65	4,285	6,705	64%
	51-80%	4,650	1,285	555	125	0	40	6,655	13,335	50%
	81-95%	1,950	215	245	45	0	10	2,465	6,055	41%
	>95%	2,960	230	220	150	0	95	3,655	30,645	12%
	All owners	12,045	6,965	1,415	495	195	220	21,335	61,780	35%

While overcrowding disproportionately impacts households with incomes less than 30 percent (1,695 renter households and 270 owner households experience overcrowding in its moderate or severe forms), it does not represent a large housing problem overall in Saint Paul. Table 3 of the 2009 CHAS dataset suggests a similar trend about the number of households at 0-30 percent of AMI living in substandard housing– though City and County data indicates there is a large need for housing rehabilitation (see §91.210. Housing and Market Analysis).

Incomes between 31 percent and 50 percent of AMI (Low Income)

Residents that have incomes between 31 percent and 50 percent of AMI are considered low income. Low income residents in Saint Paul are a diverse group. They are more likely to be elderly, people of color, one parent households and/or individuals with disabilities. According to Fig. 12 above, 76 percent of renter households with incomes between 31-50 percent of AMI have housing problems (6,640), representing the second-neediest income cohort among renters. The vast majority of these renter households are moderately cost-burdened. Interestingly, there are about the same number of owner households at 30-50 percent of AMI that have housing problems (4,285) as at the 0-30 percent level,

with 59 percent of owners at this income level experiencing either moderate or severe housing cost burdens. Elderly households in this income category represent over a quarter of all elderly households with housing problems.

Similar to households at 0-30 percent of AMI, overcrowding is not a significant issue for renter or owner households earning between 31-50 percent of AMI (impacting less than 10 percent of households). Insignificant numbers of households at 31-50 percent AMI live in substandard housing according to the above data, though City and County data indicates there is a large need for housing rehabilitation (see Figures 29 and 30).

The conclusion is that very low and low income households (0-50 percent of AMI) have the highest risk of becoming homeless due to inadequate incomes and the high cost of housing. Below is a list of the most critical needs and approaches cited by survey respondents earning 0- 50 percent of the AMI (ranked as 1-3 priorities):

Housing

- Increase mortgage foreclosure assistance.
- Preserve the existing supply of affordable rental housing.
- Housing rehabilitation assistance for low-moderate income homeowners, including ways to increase home energy efficiency.
- Provide supportive services to help households keep housing.
- Maintain/increase the supply of permanent supportive housing.
- Develop proactive homeless prevention strategies.
- Mitigate subprime lending.
- Increase outreach to and education of tenants and landlords about rights and responsibilities.
- Increase homeownership opportunities.

Community Development

- Job training
- Public health services
- Public facilities (parks/recreation centers, libraries, etc.)

Incomes between 51 percent and 80 percent of AMI (Moderate Income)

Residents that have incomes ranging between 51 and 80 percent of AMI are considered moderate income. These residents may own their home, but may not be able to afford the upkeep of these units. Home repairs are secondary to necessities such as child care, transportation, and medical assistance.

According to Fig. 12 above, 27 percent of renter households with incomes between 51-80 percent of AMI have housing problems (2,605), most of which have moderate cost burdens (1,655). Other housing problems are insignificant for renters at this income level. However, 50 percent of owner households at 51-80 percent of AMI have housing problems (6,655), with the majority of these experiencing severe or moderate cost burdens (4,650 and 1,285, respectively). Twelve percent of elderly renter households and 17 percent of elderly owner households in this income category experience housing problems.

Overcrowding is a slightly larger issue for renter households earning between 51-80 percent of AMI, impacting 21 percent of renter households with housing problems. Insignificant numbers of households

at 51-80 percent AMI live in substandard housing according to the above data, though City and County data indicates there is a large need for housing rehabilitation (see Figures 29 and 30).

Below is a listing of the most critical needs and approaches cited by survey respondents with incomes between 51 percent and 80 percent of the AMI (ranked as 1-3 priorities):

Housing

- Increase mortgage foreclosure assistance.
- Housing rehabilitation assistance for low-moderate income homeowners, including ways to increase home energy efficiency.
- Provide supportive services to help households keep housing.
- Mitigate subprime lending.
- Add to the supply of affordable rental housing, including options for large families (3+ bedrooms).
- Maintain/increase the supply of permanent supportive housing.
- Preserve the existing supply of affordable rental housing.
- Increase outreach to and education of tenants and landlords about rights and responsibilities.
- Develop proactive homeless prevention strategies.

Community Development

- Job training.
- Small business development.
- Public health services and youth services.

Incomes between 81 percent and 95 percent of AMI (Middle Income)

Even though CDBG/HOME/ESG funds are reserved mainly to benefit households with incomes less than or equal to 80 percent of AMI, the City of Saint Paul Housing Chapter of the Comprehensive Plan affirms an "all incomes" housing policy, including expanded housing choices to serve Saint Paul's middle income residents (81 -95 percent of AMI).

According to Fig. 12 above, only seven percent of renter households at 81-95 percent of the AMI have housing problems. Of the 215 renter households with housing problems, 95 households face moderate cost burdens.

Despite this population's greater ability to own a home, they are not invulnerable to housing problems. Forty-one percent of homeowner households in this income category have housing problems (2,465), the majority of them facing moderate cost burdens (1,950).

Fig. 13. Survey Results, Needs of Low and Moderate Income Saint Paul Residents, 2010-2014

	Priority ranking given by:		
Affordable Housing Approaches	**Households at 0-50% of AMI**	**Households at 51-80% of AMI**	**Households at 81% + of AMI**
Increase mortgage foreclosure assistance.	1	1	3
Preserve the existing supply of affordable rental housing.	2	3	2
Add to the supply of affordable rental housing, including options for large families (3+ bedrooms).	4	2	4
Increase home ownership opportunities.	3	4	1
Homeless & Supportive Housing Approaches			
Provide supportive services to help households keep housing.	1 (tie)	1	1
Maintain and/or increase the supply of permanent supportive housing.	1 (tie)	2	3
Develop proactive homeless prevention strategies.	1 (tie)	3	2
Fair Housing Approaches			
Mitigate subprime lending.	1	1	1
Prevent foreclosures (through counseling services).	2	2	2
Increase outreach to and education of tenants and landlords about rights & responsibilities.	3	3	3
Encourage more landlords to accept housing vouchers.	4 (tie)	4	5
Minimize housing discrimination.	4 (tie)	5	4
Community Development Approaches			
Job training	1	1	1
Public health services	2	3 (tie)	5
Youth services	5	3 (tie)	2
Public facilities (parks/rec centers, libraries, etc.)	3	5	4
Small business development	6	2	3
Homeless facilities (not housing)	4	7	7
Rehabilitation assistance for privately-owned commercial buildings	8	6	6
Lead hazard screening	7	8	8

Notes: 15 respondents had incomes between 0-30% of AMI; 15 respondents had incomes 31-50% of AMI; and 20 respondents had incomes between 51-80% of AMI. The Survey on Needs of Low and Moderate Income St. Paul Residents was conducted on SurveyMonkey.com from Jan. 2, 2010 through Feb. 24, 2010.

Disproportionate Needs

HUD requires that an assessment be made as to whether any racial or ethnic group has a disproportionate need. Disproportionate needs are determined by comparing the extent of needs of each racial/ethnic group within each income cohort (and housing tenure) against the needs of all persons (i.e. very low-income, low-income, moderate income and middle-income) in the same income cohort. More specifically, households within a particular racial/ethnic group and income cohort have a disproportionate need if the percent of households in the cohort with needs is at least 10 percentage points higher than the overall percentage of households in this same income cohort with needs. HUD defines needs as a household with a cost burden of more than 30 percent, a housing unit that lacks complete plumbing or kitchen facilities, or a housing unit with more than 1.01 or persons per room (overcrowding). To the extent that households within a racial or ethnic group and income cohort have disproportionately greater need in comparison to the needs of that category as a whole, an assessment of that specific need must be included.

Disproportionate need among renters:

- American Indians and Pacific Islanders earning incomes between 0-30 percent of AMI
- Asians earning incomes between 51-80 percent and 81-95 percent of AMI

Fig. 14. Renters with Moderate Housing Problems, Disproportionate Need

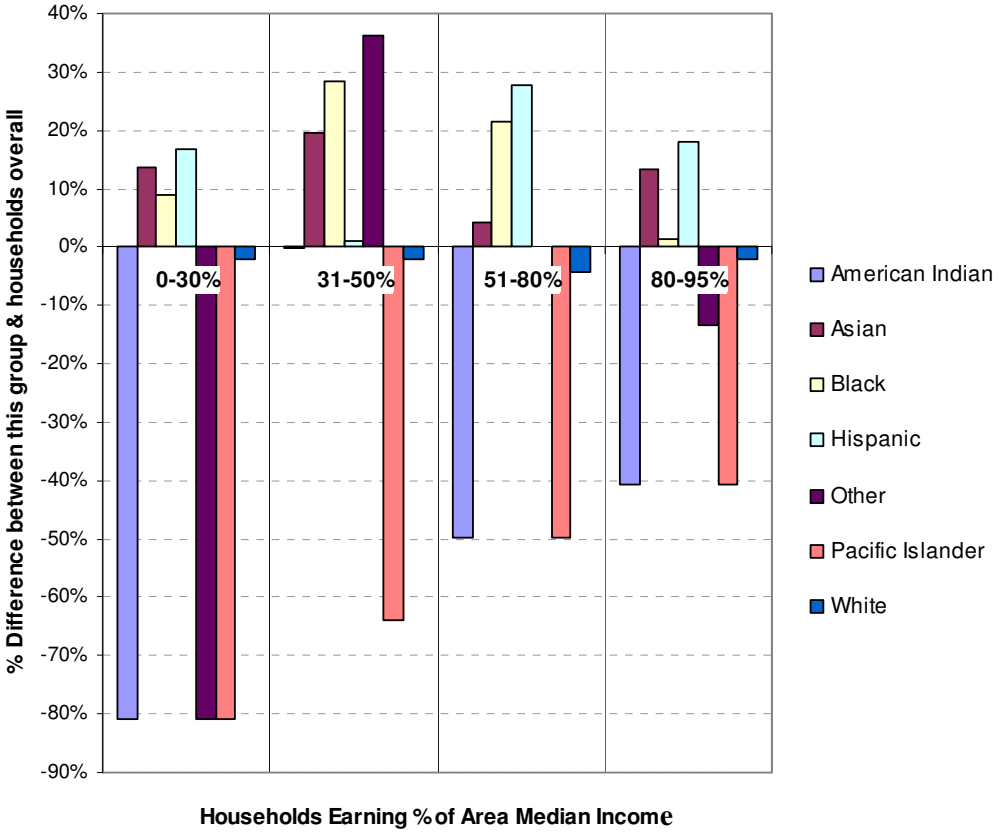
Disproportionate need among owners:

- Asian and Hispanic homeowners earning incomes between 0-30 percent of AMI
- Asian, Black, and homeowners of some other race earning incomes between 31-50 percent of AMI
- Black and Hispanic homeowners earning incomes between 51-80 percent of AMI
- Asian and Hispanic homeowners earning incomes between 81-95 percent of AMI

Saint Paul has among the nation's highest concentration of recent immigrants from Southeast Asia, particularly Hmong. According to Table 1 of the 2009 CHAS dataset, moderate and middle-income **Asian** renters as well as very-low, low, and middle income owners have a disproportionate need. The City will make efforts to provide housing rehabilitation and foreclosure prevention services in Asian newspapers, and other local venues including restaurants, funeral homes, and grocery stores.

According to the 2009 CHAS dataset, Saint Paul's **Pacific Islander** community only represents 25 households, all renting their homes within the 0-30 percent of AMI income cohort. Saint Paul's **American Indian** community is slightly larger at 510 households, consisting of both renters and owners, with over 40 percent of the total within the 0-30 percent of AMI rental cohort. Both of these ethnic groups have disproportionate needs among renters in the lowest income cohort, so the City of Saint Paul will need to make more strategic efforts to dialogue with organizations within both communities to address their affordable rental housing needs.

Fig. 15. Owners with Moderate Housing Problems, Disproportionate Need



Blacks represent the largest racial/ethnic minority group within Saint Paul among the subpopulation of households that earn below 95 percent of the AMI (16 percent of this subpopulation). Low, moderate, and middle income African-American homeowners in Saint Paul have a disproportionate need. Almost all Black homeowners earning 0-30 and 31-50 percent of AMI have moderate cost burdens. In efforts to work to ensure that African-Americans are aware of its housing rehabilitation and foreclosure prevention services, the City of Saint Paul will advertise in African-American media, and provide other information in locations frequented by this group.

There have been a growing number of immigrants from Somalia, Sudan and Ethiopia and other **African** nations. The availability of employment, housing, education and other support services has attracted them to the United States. The City will make best efforts to provide culturally-sensitive information on housing opportunities and services within the local media.

Similar to Asian and Blacks, **Hispanics** are a large and growing population, and includes both US-born Latinos and immigrants from Latin America. Very low, moderate, and middle income Hispanic homeowners in Saint Paul have a disproportionate need, with almost all households in the 0-30 percent of AMI cohort experiencing moderate housing problems. In efforts to work to ensure that Hispanics are aware of its housing rehabilitation and foreclosure prevention services (as well as the culturally-sensitive services of its partner organizations) the City of Saint Paul will continue to advertise in local Hispanic media, and provide other information in locations frequented by this group.

Fig. 16. Percent of Households with Moderate Housing Problems

	AMI	American Indian	Asian	Black	Hispanic	Other	Pacific Islander	White	Total
Renters	0-30%	93%	74%	76%	82%	89%	100%	80%	79%
	31-50%	0%	69%	76%	65%	77%	0%	77%	74%
	51-80%	0%	41%	32%	24%	22%	0%	24%	26%
	81-95%	0%	20%	4%	0%	0%	0%	5%	5%
Owners	0-30%	0%	94%	90%	98%	0%	0%	79%	81%
	31-50%	64%	83%	92%	65%	100%	0%	59%	64%
	51-80%	0%	54%	71%	78%	50%	0%	46%	50%
	81-95%	0%	54%	42%	59%	27%	0%	39%	41%

Source: Table 1, 2009 CHAS dataset

Finally, 100 percent of homeowner households that identify their race as **Other** and earn incomes between 31-50 percent of AMI in the City of Saint Paul have disproportionate housing needs. The City of Saint Paul will advertise broadly to ensure that this group is aware of its housing rehabilitation and foreclosure prevention services.

Fair Housing

As a recipient of funds from the U.S. Department of Housing and Urban Development (HUD), including the Community Development Block Grant (CDBG) and the Home Investment Partnership Program (HOME) funds, the City of Saint Paul certifies to HUD that the City of Saint Paul affirmatively furthered fair housing initiatives. To ensure that communities of color, including Blacks/African-Americans, Asians, Hispanic/Latinos, and other persons with limited English-speaking proficiencies can access City programs, the City of Saint Paul provides the following:

City of Saint Paul Lending and Foreclosure Prevention Programs. The City's Home Loan Fund and Mortgage Foreclosure Prevention Program provide low interest financing for home buying and home improvements, and foreclosure prevention and counseling services, respectively. The City's Home Loan Fund has multilingual staff that provides home ownership and foreclosure prevention counseling services in Spanish and Hmong, and has access to other language translation services, as needed. The City also collaborates with community partners, such as Minnesota Home Ownership Center which provides culturally-sensitive and multilingual pre-purchase home ownership education and foreclosure prevention counseling.

Recently, the City has planned and staffed several foreclosure workshops, and is working with lenders directly to provide lender-specific foreclosure workshops. Foreclosure-specific public service announcements also run on City Cable and foreclosure staff has participated in several radio call-in programs and television telethons. The City has and will continue to participate in neighborhood housing fairs and other community events.

Outreach to Communities of Color. The City of Saint Paul implements several marketing strategies to further promote community knowledge about housing and other services. In addition to working directly with residents, the City works with the Association of Minority Contractors to encourage minority-owned business participation in city contracts. The City reaches out to communities of color

and protected classes by using its website and newspaper media, including The *Minnesota Spokesman - Recorder, Insight, Asian-American Press, Hmong Times, La Prensa, and The Circle* newspapers.

To achieve its housing rehabilitation and neighborhood revitalization goals, the City works with numerous community development corporations (such as Greater Frogtown Community Development Corporation, East Side Neighborhood Development Corporation, Dayton's' Bluff Neighborhood Housing Services, NeDA, Rondo Land Trust, Twin Cities Habitat for Humanity, etc.) on home improvement, vacant housing rehabilitation and new infill housing construction, especially to serve low and moderate income populations, including households within the various communities of color.

Limited English Proficiency Plan. One in five City of Saint Paul residents speaks a language other than English in their homes, and primary non-English language groups include, but are not limited to, Spanish, Hmong, and Somali. Because the City is committed to making its services and information about those services available to all, it will provide services to individuals who may be limited English proficient ("LEP") as a result of national origin.[14] The City is creating a plan that outlines and describes how the City will improve access to its services for LEP individuals.

The policies and procedures contained in the LEP document apply to all City departments and all City employees who interact directly or indirectly with LEP individuals. Each City department will be required to produce their own department-specific LEP plans and to budget for LEP services. The City's Department of Human Rights and Equal Economic Opportunity (HREEO) is the lead department in implementing the City's LEP plan.

Housing/Building/Fire Code Enforcement. To assist residents with limited English proficiencies, the City's Code Enforcement division within the Department of Safety and Inspections (DSI) issues its Correction Notices with a reference for language translation service in Spanish and Hmong. Additionally, language translation services are available to explain Code Enforcement Legislative Hearings and the City's Special Assessments. DSI is also able to provide building code instructions in various languages for homeowners wishing to do improvements.

Racial/ethnic disparities within Saint Paul make it imperative for the City to focus on the needs of all the abovementioned groups and provide as much information as possible regarding City services or other resources in the community.

[14] As a recipient of federal financial assistance, the City is required by federal law to plan for and provide meaningful access to City services for LEP individuals. The plan has been prepared in accordance with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, et seq., and its implementing regulations, which state that no person shall be subjected to discrimination on the basis of race, color, or national origin. Executive Order 13166, titled "Improving Access to Services for Persons with Limited English Proficiency" indicates that differing treatment based upon a person's inability to speak, read, write, or understand English is a type of national origin discrimination. It directs Federal agencies to publish guidance for its respective recipients clarifying their obligation to ensure that such discrimination does not take place. This Executive Order applies to all state and local agencies, which receive federal funds, including all City departments receiving federal grant funding.

Housing Need Summary and Trends

In anticipating changes in housing needs over the next five years, the City assumes the following trends:

- Baby boomers will continue to retire, which will sustain the demand for housing choices that cater to senior preferences.
- The City's racial/ethnic minority populations may continue to increase, sustaining the demand for culturally-sensitive services and affordable housing options.
- High unemployment levels will continue to lead to housing foreclosures and sustain the demand for rental housing.
- Housing cost burdens will remain high as long as employment opportunities and wages remain stagnant.
- Renter households will continue to need quality rental housing, including Nonfamily, Large Related, Small Related, Elderly, and Disabled Elderly family types; options affordable to households under 30 percent and between 31-50 percent of the AMI are in the highest demand.
- The rental market may tighten, particularly among units with affordable rents.
- Unsustainable mortgages will continue to fail, causing housing foreclosures to continue to rise.
- Owner households will continue to face cost burdens, particularly among Nonfamily and Small Related family types; households between 0-80 percent of the AMI will demand access to services and will need to take actions related to lessening such cost burdens.
- Mortgages will continue to only be available to households with a good credit history and have a deposit of between 20-40 percent of a home's value.
- A number of costs will continue to make it difficult to provide affordably-priced rental housing for very low income residents, including but not limited to construction, maintenance, and operations.
- Cuts in funding at the local, state and federal levels will continue to impact the type and the number of affordable housing units the City and other organizations can preserve and provide.

§91.205 (b) Homeless Needs Assessment

Definition of Homeless Resident. The United States Code contains the definition of homeless as individuals who lack a fixed, regular, and adequate nighttime residence; or individuals that have a primary nighttime residence that is a supervised, publicly- or privately-operated temporary living accommodation, including emergency shelters, transitional housing, and battered women's shelters; or have a nighttime residence in any place not meant for human habitation.[15]

Definition of Long-term Homeless Resident. An individual is considered chronically homeless if an individual has (a) either lived continuously in a shelter for 12 months or more ending in (or continuing through) the year in question, or (b) had separate shelter stays during at least four calendar quarters in the past three years, including the year in question.

Nature and Extent of Homelessness. With financial support from the City of Saint Paul, Wilder Research Center has conducted longitudinal surveys, research, and analysis of the homeless population in Ramsey County since 1990. Thus, much of the current data herein reflects the information compiled in the *Counting on Shelter – Emergency Housing Use in Ramsey County, 2006 and 2007* report.[16] One large conclusion is that the use of adult and family shelters in Ramsey County has increased to the highest level in 17 years of record keeping. While the number of people using shelters was similar to previous years, residents were staying in shelters longer.

Emergency Shelter

Usage. From 2003 through 2007, Wilder Research Center reports that the total number of people (approximately 4,200 residents) using Ramsey County emergency shelters has remained stable. While the total number remains stable, however, homeless residents were staying longer.[17] The number of separate shelter stays for adults was 9,757 in 2006, and the number of separate shelter stays was 9,354 in 2007. In total, the adult and family shelters included in Wilder Research study provided 121,256 bed nights of emergency shelters to individuals in 2006, and 121,022 bed nights in 2007.

There are high demands placed on available emergency shelter services. In 2003, Dorothy Day Extended Hour Program changed from a winter-only shelter to a year-round shelter. In 2009, Dorothy Day Extended Hour Program often operated at capacity such that the City and County was required to provide additional funding for overflow shelter use during winter 2009-2010. At the same time, emergency shelters for youth and families operate at capacity. It is difficult to count the actual numbers of homeless residents because many homeless individuals seek alternative living situations, such as living outside, doubling up with others, or living in abandoned buildings, when emergency shelters are full.

Overall, 4,202 individuals entered emergency shelters in 2006, and 4,091 individuals entered emergency shelters in 2007. Sixty-one percent of all adults using emergency shelters were single men, 11 percent

---

[15] U.S.C. Title 42, Chapter 119, Subchapter 1.

[16] Counting on Shelter-Emergency Housing Use in Ramsey County, 2006 and 2007, Wilder Research, February 2009, Craig Helmstetter and Emily Warren.

[17] In early 1990, the average shelter stay was two weeks. In 2003, average shelter stay increased to 25 days. In 2006/2007, average shelter stay was 30 days. *Counting on Shelter-Emergency Housing Use in Ramsey County, 2006 and 2007*, Wilder Research, February 2009.

were single women, 11 percent were adults with children, and 17 percent of the shelter residents were children.

Single Men. In 2006, 2,575 single men used Ramsey County emergency shelters, while 2,485 single men used them in 2007. The average age of single males continued to be older as more than half of the adults using shelter in both 2006 and 2007 were age 40 or older. While more single men used emergency shelters, the higher demand may reflect improved data collection due to the expanded service hours at the largest shelter available to men. Furthermore, single men were more likely to have several emergency shelter stays than single women or adults with children.

Single Women. In 2006, 457 single women used Ramsey County emergency shelters, while 502 single women used them in 2007. Single women were also more likely to return to emergency shelters during 2003. In contrast, single women represented 49 percent of the adults entering transitional housing.

Families. In 2006, 459 adults with children used Ramsey County emergency shelters, while 430 adults with children used them in 2007. At the same time, 711 children were residing in shelters in 2006, while 674 children resided in them in 2007. In contrast, during better economic times (2003), 349 families used emergency shelters. While families stayed at emergency shelters longer, families are limited to 30 consecutive days at the primary family shelter in Ramsey County. On the other hand, larger families seek to use transitional housing and battered women's shelters rather than emergency shelters.

Patterns of Emergency Shelter Use. In 2006-2007, people using emergency shelters had more frequent and longer stays than before. More than half of all adult males had repeated stays in emergency shelters, and nearly half of the single women had repeated stays in emergency shelters. Throughout this decade, about one fourth of adults with children who used emergency shelters had two or more separate stays in the same year. On the other hand, fewer families used emergency shelters which may be due to residency requirements or the County's successful shelter diversion programs that provide emergency funds to resolve a housing crisis.

Wilder Research also identified 241 chronic users of emergency shelters in 2006 and 254 chronic users of them in 2007.[18] Chronic shelter users are defined as 1) living continuously in a shelter for 12 months or more, or 2) having separate shelter stays during at least four calendar quarters in the past three years, including the year in question. Chronic shelter users are predominately adult males without children. Additionally, Wilder Research identified long-term shelter users during the 2004-2007 period, consisting of 30 percent of all single males who used emergency shelters, 20 percent of single females who used emergency shelters, and only 3 percent of adults with children who used them. Although long-term shelter users represent a quarter of all adult shelter users, long-term shelter users consume about half of the shelter capacity used by adults in recent years.

[18] According to Wilder Research, chronic users of emergency shelters represent 6-7 percent of emergency shelter residents during 2006-2007. That said, the 2006-2007 Wilder Report is still likely to underestimate the actual numbers of individuals in Ramsey County who would meet the state's definition of long-term homelessness.

Fig. 17. Table 1A – Homeless and Special Needs Populations

Continuum of Care: Housing Gap Analysis Chart

		Current Inventory	Under Development	Unmet Need/ Gap
		Individuals		
Example	**Emergency Shelter**	**100**	**40**	**26**
Beds	Emergency Shelter	334	0	0
	Transitional Housing	232	0	40
	Permanent Supportive Housing	545	52	350
	Total	1,111	52	390
		Persons in Families With Children		
Beds	Emergency Shelter	219	0	50
	Transitional Housing	609	0	120
	Permanent Supportive Housing	1,055	48	350
	Total	1,883	48	520

Continuum of Care: Homeless Population and Subpopulations Chart

Part 1: Homeless Population	**Sheltered**		**Unsheltered**	**Total**
	Emergency	**Transitional**		
Number of Families with Children (Family Households):	66	172	1	239
1. Number of Persons in Families with Children	186	494	4	684
2. Number of Single Individuals and Persons in Households without children	389	215	89	693
(Add Lines Numbered 1 & 2 Total Persons)	575	709	93	1,377
Part 2: Homeless Subpopulations	**Sheltered**		**Unsheltered**	**Total**
a. Chronically Homeless	181		52	233
b. Seriously Mentally Ill	355		61	396
c. Chronic Substance Abuse	156		37	193
d. Veterans	83		17	100
e. Persons with HIV/AIDS	7		1	8
f. Victims of Domestic Violence	255		6	261
g. Unaccompanied Youth (Under 18)	72		0	72

Previous housing prior to entering emergency shelters. In general, 70 percent of the adults served by the emergency shelter intake reported that their last permanent address was in Ramsey County. While most of the emergency shelter users are Ramsey County residents, there was a nine percentage point increase in those reporting last permanent address outside of Minnesota in 2007. Nonetheless, most adult emergency shelter users reported living in "another shelter" prior to entering the emergency shelter.[19] On the other hand, single men (55 percent) reported "another shelter" as their housing before entering emergency housing again.

Transitional Housing

Usage. The most recent surveys of homelessness did not report data regarding transitional housing facilities; that said, it can be assumed that much of the data recorded in 2003 would still be applicable to transitional housing trends in 2010. According to Wilder Research, 699 individuals (adults and children) resided in participating transitional housing in Ramsey County during 2003. Transitional housing use remained fairly consistent, but at a slightly lower level in 2003 than 2002. More specifically, 182 single females and 29 single men used transitional housing, representing 26 percent and 4 percent of transitional housing users, respectively.[20] Families comprised more than 70 percent of all transitional housing residents (158 adults and 330 children). Children comprised nearly 50 percent of all individuals in transitional housing - a fairly consistent trend since 1996.

Prior to entering transitional housing, 56 percent of the homeless adults lived in Ramsey County and 45 percent of adult transitional housing residents lived in Ramsey County for most of the last five years. In contrast, only 10 percent of the transitional housing residents reported their last permanent address as outside Minnesota. A third of adult transitional housing residents (33 percent of the total) lived with friends or relatives during the month prior to entering emergency shelters. Finally, most adults (42 percent) reported "another shelter" as their housing before entering transitional housing.

Wilder Research Center's statewide report records an approximate 20 percent decline in use of transitional housing in 2006 from 2003. However, during the same time, the amount of permanent supportive housing in Minnesota has nearly doubled. Therefore, it is reasonable to conclude that permanent supportive housing is providing housing for many formerly homeless adults. [21]

Shelters for Victims of Domestic Abuse

Due to data privacy issues, statistics on victims of domestic abuse were based upon exit information provided by several shelters for victims of domestic abuse. According to the most recent Wilder Research data recorded in 2003, 1,129 women exited from domestic violence shelters in Ramsey County. The median length of stay was about one week which is similar to past years. Characteristics of women exiting shelters for victims of domestic abuse remained fairly consistent. As in past years, over half of the women in shelters for victims of domestic abuse were African-American; 68 percent

---

[19] According to Wilder Research, 55 percent of all adults entering emergency shelters (2006) and 52 percent of all adults entering shelters (2007) reported living in another shelter prior to entering the emergency shelter.

[20] According to Wilder Research, most single male adults who are homeless reside in emergency shelters. In contrast, most families with children seek transitional housing facilities especially since there are a limited number of shelter beds for families in Ramsey County. *Emergency Shelters, Transitional Housing, and Battered Women's Shelter, Ramsey County Data Collection Project, Thirteenth Annual Report*, Wilder Research Center, 2004.

[21] *Overview of Homelessness in Minnesota 2006*, Wilder Research Center, March 2007.

graduated from high school; 24 percent had higher educational training; and finally, about half of women exiting them indicated that their last permanent address was in Ramsey County.[22]

According to its 2008 Annual Report, Women's Advocates served approximately 46 persons a day which totals 800 individuals - over half of those were children. Each year, Women's Advocates provides 17,000 shelter days in addition to providing individualized support services, including providing some rental assistance. Women's Advocates also provides on-site mental health services as well as partnering with community services, such as Health Care for the Homeless, Saint Paul Public Schools Title 1 Program, and Southern Minnesota Regional Legal Services.

In 2008, over one-half of the Women's Advocate residents were 29 years of age or younger; 87 percent of the residents were racial or ethnic minorities; 73 percent were African-American; 88 percent of families had annual incomes less than $12,000; and 42 percent of those families reported no income when entering Women's Advocates. It is further estimated that 40 percent of the women had mental health issues. Finally, 53 percent of the residents living at Women's Advocates were children under the age of four, and 75 percent of the children have witnessed domestic violence. Fortunately, 89 percent of the women served in 2008 left Women's Advocates to move to a safe new residence – free from violence.

Youth

Definition of Homeless Youth. Homeless Youth include youth who currently have no parental, substitute, foster or institutional home to which they can safely go. They are unaccompanied by an adult and have spent at least one night in a formal emergency shelter, improvised shelter, doubled up or on the street.[23] Homeless youth are unaccompanied homeless youth (ages 8 to 17) and young adults (ages 18 to 20).

Need. Much of the data herein reflects the information compiled in the Wilder Research Center's Overview of Youth and Young Adult Homelessness - 2006 Statewide Survey which relied on shelters and agency staff to identify homeless youth.[24] Still, the number of homeless young people found in this point-in-time study was partly dependent on shelter capacity at the time of the study.

According to Wilder Research, there is an estimated 550 to 650 unaccompanied homeless youth under age 18 and an estimated 700 to 1,650 homeless young adults (ages 18-21) living on their own on any given night in Minnesota. This statistic may be an underestimated count because homeless youth often stay with friends temporarily or live in uninhabitable places rather than stay in shelters. Based upon the statistical data, it can be extrapolated that there may be 115-135 unaccompanied homeless youth (ages 8 to 17) and 115 - 270 homeless young adults (ages 17-20) living in the City of Saint Paul on any given night.[25] Although unaccompanied homeless youth and homeless young adults may share similar

---

[22] *Emergency Shelters, Transitional Housing, and Battered Women's Shelter, Ramsey County Data Collection Project, Thirteenth Annual Report*, Wilder Research Center, 2004.

[23] Wilder Research citing components of this definition as described in Kryder-Coe, J., et al (Eds.) (1991) Homeless Children and youth (pp. 34-35) New Brunswick, NJ: Transaction Publishers. *Homeless in Minnesota 2006: At a glance. Youth and Young Adults on Their Own.* Wilder Research, November 2008.

[24] Overview of Youth and Young Adult Homelessness in Minnesota, Facts and Analysis of Data from the 2006 Statewide Study, Wilder Research Center, June 2008

[25] During survey interviews, Wilder Research estimated that there are 500-600 homeless youth age 8-17 living on their own in addition to homeless children living with their parents in shelters on any given night in Minnesota. Wilder Research also reports that

characteristics, the needs of unaccompanied homeless youth are heightened by additional legal barriers to securing housing. Additionally, since youth homelessness includes youth who are doubled-up on a temporary basis with friends, it is difficult to accurately estimate the number of homeless youth in the City of Saint Paul.

According to the Wilder Research Center Report, the average age was 16 years old for unaccompanied homeless youth and 19 years old for homeless young adults. Approximately six of 10 homeless youth and young adults were female.[26] That said, 13 percent of the unaccompanied homeless youth had children, and 38 percent of young homeless adults had children. In the Twin Cities metro area, 66 percent of homeless youth are children of color.

At the same time, homeless youth often experience difficulties in maintaining housing stability. Fifty-five percent of homeless youth reported being told to leave or were locked out of their home. Thirty-three percent of homeless youth have been told by medical personnel that they had a serious mental health problem. More than one half of homeless youth and homeless young adults have been physically abused or sexually abused. Nearly 24 percent of homeless young adults report that they reside in an abusive situation because they have no other housing options.

Yet, despite all the difficulties faced, 15 percent of homeless youth reported being currently employed, 88 percent of homeless youth were enrolled in school, and 55 percent of homeless youth remained in the same school all year.[27]

Homeless Subpopulations

The 1993 Wilder Data Collection Report comments on subpopulations:

> *"Analyzing the different reasons for being in shelter for different subpopulations is an important part of this project. Given that adults with certain characteristics are less likely to report their reasons for being in shelter, providers are encouraged to especially help gather and record this data for adults who come from their own residence, have less than a high school education, and/or have not recently worked. Also, adults who become repeat or chronic users are less likely to report their problems the first time they use a shelter. Knowing the problems of repeat or chronic versus one-time users may be valuable in the future to help determine the most effective strategies for serving both groups."*

In past community meetings, housing providers, housing advocates, service providers, and City staff would concur with most emergency shelters, transitional housing, and battered women's shelter residents who reported that lack of affordable housing and lack of income are major reasons for emergency housing and transitional housing. However, shelter providers and City housing staff would

---

approximately 50 percent of the homeless youth live in the metropolitan area. The City of Saint Paul assumes that 90 percent of the 50 percent of homeless youth live in Minneapolis or Saint Paul. Correspondingly, the City of Saint Paul assumes that 50 percent of the urban homeless youth reside in Saint Paul.

[26] According to Wilder Research, national studies show that homeless female youth were more likely to seek shelter and services.

[27] According to Wilder Research, 15 percent of homeless youth who were employed earned less than $8.00/hour. Other primary sources of income were parents, relatives, and friends. The medial total income was $88 for male homeless youths and $200 for female homeless youth. Homeless in Minnesota 2006: At a glance. Youth and Young Adults on Their Own. Wilder Research Center, November 2008

also report higher incidences of mental illness and chemical dependency than reported by the shelter users. City housing staff would also concur with the Wilder Research's one-night survey that chemical dependency is a problem for 46 percent of the interviewed residents. Consequently, it can be inferred that emergency shelter users often have multiple barriers, such as mental illness and chemical dependency. More importantly, it is important to note that chemical dependency, mental illness, and traumatic brain injury, are often major reasons why unsheltered homeless residents are reluctant to choose living in a shelter, transitional housing, or permanent supportive housing. That said, Police Homeless Outreach Project, People Inc., and Access Program are community programs that are trying to address this difficult chronic homelessness problem.

Fig. 18. Race and ethnicity of adults entering emergency shelter by household types[28]

	All Adults	**Single Adults - Male**	**Single Adult Female**	**Adults with Children**
2006	*N=3,142*	*N=2,371*	*N=438*	*N=333*
African-American	48%	46%	38%	68%
White	38%	38%	49%	20%
Hispanic	5%	6%	2%	4%
American Indian	4%	3%	1%	1%
Asian	1%	1%	1%	1%
Multi-racial/Other	4%	6%	2%	3%
2007				
African-American	48%	46%	46%	67%
White	39%	41%	41%	22%
Hispanic	6%	6%	4%	5%
American Indian	45	3%	8%	4%
Asian	1%	1%	>1%	1%
Multi-racial/Other	3%	3%	1%	1%

Race of Homeless Youth. In 2006, Wilder Research's statewide survey reported that 34 percent of homeless unaccompanied youth were White or Caucasian, 29 percent of homeless youth were African-American or Native African, and 20 percent of homeless youth were American Indian. The number of homeless young people of color is disproportionately high compared to their prevalence in the general population of Minnesota youth of which only 15 percent are people of color.

Need of Sheltered and Unsheltered Homeless Adults and Families

Needs for Adults and Families for Emergency Shelters. Based upon its statistical analysis, Wilder Research Data Collection Report identified a wide variety of problems and needs. Simply, most homeless adults and families report that the lack of affordable housing, lack of income, or lack of employment are the major reasons for needing emergency shelters. In 2006, 50 percent of all adult

[28] According to Wilder Research, racial disparities is a persistent and distressing trend as there is an overrepresentation of African Americans and American Indians within homeless population in Minnesota. Nearly 50 percent of all homeless person in the Twin Cities metro area are African American and nearly 20 percent of homeless persons in greater Minnesota are American Indian. By comparison, 2000 Census indicates that the City's population is 64 percent White, 11 percent African American, 8 percent Hispanic, 1 percent Native American, and 12 percent Asian American. *Race and ethnicity of adults entering emergency shelters by household types for 2006 & 2007*, *Counting on Shelter, Ramsey County 2006-2007*, Wilder Research Center, February 2009.

emergency shelter residents reported the lack of affordable housing as a major reason for emergency shelters. In fact, many homeless adults cannot afford private market rental housing.[29]

In contrast, a personal or family crisis was a causal factor reported by 11 percent of the adult shelter users in 2006, and evictions were cited in approximately 12 percent of the adult responses during 2006-2007. On the other hand, shelter providers consider chemical dependency and mental illness problems greater than reported by emergency shelter users. Concurrently, shelter providers recognize that physical abuse probably occurs more often than reported by shelter users.

In 2006, 70 percent of all adults with children using shelters reported a lack of affordable housing as a reason for entering emergency shelters. While homeless families may have higher incomes than homeless single adults, private market housing is still an unattainable goal. Many modest-priced apartments ($600 for 1 bedroom, $700 for 2 bedrooms) are too costly for residents with incomes such as Minnesota Family Investment Program (MFIP), General Assistance, Social Security, and Day Labor. Consequently, the inability of low income families to secure and maintain affordable housing often severely impacts children's development. In addition to the trauma of having no stable residence, homeless children often go without basic necessities, such as medical care, meals, and clothing, and experience learning problems.

Needs of Adults and Families for Transitional Housing. Seventy percent of all adults with children reported lack of affordable housing as a reason for transitional housing, compared to 51 percent of single women needing transitional housing. Correspondingly, 44 percent of all the adults with children cited employment and income problems as substantive reasons for needing transitional housing. Furthermore, some personal or family crises were causal factors for 46 percent of single female residents. Finally, 57 percent cited mental illness, while 38 percent of all adults and 55 percent of single women cited chemical dependency as reasons for needing transitional housing.

Needs of Unsheltered Homeless. It is difficult to determine the actual number of homeless people who are unsheltered on particular day. While the Wilder Research Data Collection Report does extensive surveys of shelters and non-shelter areas, the survey may miss persons who are doubled-up, sleeping outside, or living in unknown locations not typically meant for human habitation. Still, it can be extrapolated that estimates of the "non-shelter users" may be 20 percent of the shelter-using population, depending upon the availability of shelter openings, seasons, and weather conditions. Still, more spaces in emergency shelters were needed. In response, during 2003, the Dorothy Day Extended Hour Program was expanded from a winter-only program to a year-round program to better serve the emergency shelter needs.

Needs of Homeless Youth. In reviewing Wilder Research statistics, unaccompanied homeless youth and young homeless adults have two basic needs - safe and decent housing and a supportive environment in which to thrive. That said, homeless youth still need emergency shelters and transitional housing facilities. Moreover, homeless youth need appropriate individual case management

[29] Wilder Research reports that median income for homeless adults was $400; and for those homeless adult that are employed, the median income in Twin Cities metropolitan area was $800. *Overview of Homelessness in Minnesota 2006*, Wilder Research Center, March 2007. At the same time in 2006, private market apartment rents ranged from $450 (efficiency) to $700 for one bedroom. In Saint Paul, there are few efficiencies that rent for $450. Thus, most homeless residents cannot secure permanent housing especially when government-assisted housing is limited.

and family reunification services, as 60 percent of homeless youth reported family conflicts as a reason for homelessness.

Housing Strategies

Serving Sheltered and Unsheltered Homeless Adults and Youth. The Wilder Research Report recognizes that public assistance incomes frequently are insufficient to pay monthly housing costs and other living necessities. Furthermore, this shortage of funds may contribute to eventual evictions and increased emergency shelter usage, especially devastating for families with children. More specifically, many modestly-priced apartments in Saint Paul are too costly for individuals and families with incomes limited to the Minnesota Family Investment Program (MFIP), General Assistance (GA), Social Security disability, Unemployment Benefits and Day Labor. Consequently, sheltered and unsheltered homeless individuals and families need more affordable housing and income-producing opportunities.

City of Saint Paul's Affordable Housing Policy. In 1999, the City Council adopted an affordable housing policy which requires that 20 percent of all new housing production be designated as affordable housing. During 2002-2005, the City's Housing Production Plan (Housing 5000) created 5,371 housing units of which 2,047 housing units were affordable to households at incomes 0-60 percent of AMI, such as American House (single room occupancy units in downtown Saint Paul), Strauss Apartments (state-funded MARIF units with estimated rent ranges of $300-$400 for 1-2 bedroom units), Homes for Learning (affordable units for large families), and 7th Street Passages, (supportive housing for youth). Additionally, the City used its housing financing tools to preserve affordable family housing such as Ames Lake Apartments, Terraces Apartments, and East Side Commons. In addition to using federal and state funds, the City uses its Low-Income Housing Tax Credit allocation to create or preserve affordable housing in Saint Paul. Moreover, the City partners with Minnesota Housing to create additional units of permanent supportive housing. Finally, the City works with community partners including Twin Cities Habitat for Humanity and neighborhood community development corporations to provide affordable home ownership to families with incomes at 80 percent of the area median income.

Currently, City of Saint Paul has 16,256 households who receive affordable rental housing benefits, which represents 36 percent of all rental units in Saint Paul. That said, the challenging economic changes have created almost insurmountable barriers to producing affordable housing during the past several years.[30]

However, in 2009, Saint Paul was able to leverage local funds with federal HOME funds, Low Income Housing Tax Credits, and federal stimulus funds to move forward to closing the financing for the construction of 192 new affordable housing units, including the Renaissance Box building, the Commerce Building, and Minnesota Building, and the preservation of 35 affordable housing units (Terraces Apartments). Additionally, the City was able to create opportunities for two additional housing development projects with the preservation of 103 affordable housing units and the construction of two new housing units (East Side Commons and Saint Phillip's Gardens). In 2010-2014, the City will continue to seek financing resources in order to produce or preserve more affordable housing.

[30] As of February 24, 2010, the City of Saint Paul has 4,249 Public Housing units, 4,232 Section 8 rental-assisted households, and 10,279 publicly-assisted rental units financed by federal programs such as Section 202, 236, 221d3, tax credit-financed projects, state programs, and other locally-financed programs such as those by the Saint Paul Housing and Redevelopment Authority. These totals do not include supportive housing units or licensed community residential facilities or emergency shelters.

Supportive Housing. City of Saint Paul recognizes the need for supportive housing for its diverse citizenry, including those residents suffering from chemical dependency and mental illness. In response, the City provides financing to build or preserve supportive housing, and the City allocates some of its federal Emergency Shelter Grant program and Homelessness Prevention and Rapid Re-Housing funds to assist the operations of supportive housing programs. Since 2002, the City has financed more than 405 supportive housing units, such as 7th Landing (new construction supportive youth housing) American House (new construction & renovation of SRO with support services), Arlington Gardens (construction of supportive housing for seniors & persons with limited mobility), YWCA Transitional Housing (rehabilitation of existing supportive housing), Visitation (construction of supportive family housing), Crestview (construction of supportive housing for chemically dependent families), Model Cities (construction- rental supportive housing), St. Christopher (renovation of existing building into supportive housing) and Jeremiah Saint Paul (new construction of supportive housing for single women and children, Jackson Street Village (supportive family housing), and Winnipeg Apartments (affordable family housing with some supportive housing units).

Homelessness Prevention and Rapid Re-Housing. Under the American Recovery and Reinvestment Act, the City is able to administer the Homelessness Prevention and Rapid Re-Housing Program (HPPR) for families, single adults and unaccompanied youth living in Saint Paul who are homeless or at-risk of being homeless. The City is also partnering with Ramsey County to create a more comprehensive homelessness prevention delivery service, including leveraging HPRP funds with state homelessness prevention funds (FHPAP). The goal of HPRP is to ensure the broadest coverage to serve homeless single adults, homeless families and homeless unaccompanied youth, as well as to underserved populations, such new refugee Americans and homeless veterans.

Emergency Shelter Grant (ESG). During the program year, the City of Saint Paul administers the Stewart McKinney Emergency Shelter Grant and periodically conducts community outreach to emergency housing shelters. The City's ESG provides funding for emergency shelters for adults, families, and youth (Dorothy Day Center – Extended Hours Program, Ain Dah Yung Teen Shelter, Family Service Center, and Project HOME) transitional housing (Emma Norton, LSS Safe House for youth, Theresa Living Center, YWCA Transitional Housing Program, and Police-Homeless Outreach Project), and other community services (Listening House, HouseCalls, and Twin Cities Community Voice Mail). Overall, a reasonable estimate is that ESG assists 7,085 shelter and unsheltered homeless individuals during its fiscal year.

Ramsey County Continuum of Care. The City of Saint Paul works with Ramsey County Community Human Services Department's Continuum of Care - a coordinated approach to end homelessness. Specifically, the City is actively partnering with Ramsey County Continuum of Care by leveraging HPRP funds with state homelessness prevention funds. Moreover, the City is working with Ramsey County Continuum of Care Committee to create a comprehensive homelessness prevention program. The Continuum of Care membership includes housing providers, support service provides, advocates, County staff, City staff, and citizens who have experienced homelessness. To ensure coordinated efforts, the Continuum of Care membership includes numerous advisory boards such as the following:

- The St. Paul/Ramsey County 5-Year Low Income Housing and Homeless Services Plan Funders Council (Funding, Project Recruitment, Advocacy)
- St. Paul Area Coalition for the Homeless (advocacy, information forum on homelessness)

- Family Homeless Prevention and Assistance Program Advisory Committee (Homeless Prevention Subcommittee)
- Saint Paul/Ramsey County Homeless Advisory Board (*Heading Home Ramsey*- a Plan to End Homelessness in Ramsey County)
- Metro-wide Engagement on Shelter and Housing (Advocacy, Education, and Collaboration)
- The Corporation for Supportive Housing (Advocacy, Technical Assistance, and Predevelopment Funding)

The City works with many of these committees and other non-profit organizations to address homelessness issues. Additionally, the City and County participate with the Funders' Council - a monthly coordination meeting of public and private funders that review programs, proposals and financing needs of emergency shelters, transitional housing, and supportive housing in Ramsey County.

City of Saint Paul Mortgage Foreclosure Prevention Program. As a HUD-approved housing counseling agency, the City's Mortgage Foreclosure Prevention Program (MFPP) prevented homelessness by providing mortgage default counseling to approximately 1,498 Saint Paul homeowners-in-default during October 1, 2008 to September 30, 2009. MFPP assists homeowners-in-default with individual foreclosure prevention counseling and budget counseling. More important, MFPP works with homeowners and lenders for loan repayment plans and forbearance agreements. Furthermore, MFPP refers homeowners to other community resources, such as Ramsey County Human Services (emergency assistance), Public Health (public health services), and Saint Paul Foundation (emergency grants). MFPP can provide individualized housing counseling in Spanish, Hmong, Russian, and other languages, as needed. To prevent long-term homelessness, MFPP also combats predatory lending practices and works with Southern Minnesota Regional Legal Services, the Minnesota Department of Commerce and the Minnesota Attorney General's Office when MFPP questions lending practices as possible violations of state and federal lending laws.

§91.205(c) Special Needs – Not Homeless

This section discusses the housing and community development needs of Saint Paul residents who are not homeless but require supportive housing. Within the city, many families and individuals struggle with multiple barriers to secure and maintain housing. Consequently, these city residents are more likely to have lower incomes, have difficulty paying housing and utility costs, or have individual concerns that require enhanced community services. The groups discussed in this section are:

- Elderly;
- Frail elderly;
- Persons with developmental disabilities;
- Persons with HIV/AIDS;
- Persons with physical disabilities;
- Persons with chemical dependency issues, such as alcohol or other drug addictions;
- Persons with mental illness; and
- Persons with Limited English Proficiency and refugees

Elderly and Frail Elderly. According to the US Census, there are 26,380 elderly persons living in the City of Saint Paul.[31] Nonetheless, the Minnesota State Demographic Center has forecast dramatic growth in the number of senior citizens in Saint Paul during the next twenty years, as the 65-85 age group is projected to grow by 30 percent, and the 75-84 age group will grow by 15 percent. In context, there will be older adults as "baby boomers" continue to enter retirement age. In fact, Minnesotans over 65 will represent one-fifth of the state's population in the next twenty-five years. [32]

In Saint Paul, 15,570 older adult households own their own home, and 6,800 older adults are renters.[33] Still, many older Saint Paul adults live in homes that need repair, and at the same time, many "baby boomer" adults will continue to seek more housing alternatives with universal design options or visitability design features.

With advances in medical technology, the number of frail elderly in Saint Paul will increase as elderly residents live longer. Consequently, older adults will place significant demands on both institutional and community-based long-term care services, including requiring more assisted living options or supportive services such as home health care, meals on wheels, transportation, housekeeping, and other daily life management services.

Residents with Developmental Challenges. According to Ramsey County Community Human Services, there are approximately 1,186 Saint Paul residents with developmental disabilities who receive case management and supportive services.

Residents living with HIV/AIDS. There are approximately 860 Saint Paul residents living with HIV/AIDS in Saint Paul. These residents often have multiple barriers to securing housing, as medical conditions often reduce income necessary to secure housing and needed supportive services.
Residents with Physical Challenges. In Saint Paul, there are approximately 10,755 households that have

[31] CHAS 2009 dataset, Table 5.
[32] Older Adult Services: Trends and Issues, a Wilder Foundation Discussion Paper, Wilder Research Center, October 2006
[33] 2009 CHAS, Table 6

mobility concerns or self-care limitations.[34] While these families and individuals can access federal and state programs, the need for accessible-designed affordable housing remains great, especially for accessible-designed housing near transit options.

Residents with Chemical Dependency Issues. Chemical dependency issues, such as alcohol and drug addiction, affect many Saint Paul individuals and families. Some residents need supportive housing to facilitate their recovery process from chemical dependency. On the other hand, Saint Paul also has chronically-inebriated residents who need a "Housing First," harm reduction supportive housing model that can reduce further harm done to the individual and community resulting from chronic alcoholism.

Residents with Mental Illness. As defined state and federal classifications, Saint Paul has approximately 5,594 adult residents with serious and persistent mental illness. These residents may benefit from a wide range of housing opportunities, such as independent living, group home options, assisted living opportunities, and institutional care.

Residents with Limited English Proficiency. There are approximately 59,540 residents who speak English "less than very well"[35] or a language other than English at home; many new Saint Paul residents have migrated from Russia, Somalia, Ethiopia, Burma, and Southeast Asia.

Special Needs of the Elderly and Frail Elderly

Total population. According to US Census, Saint Paul has 27,545 residents aged 65 years and older, [36] which is approximately 10 percent of the city's population. The Minnesota State Demographic Center forecasts that the state population over age 65 will grow by 125 percent as the giant baby boomer generation continues to age. Although most of this growth may occur in first-ring post-war suburbs, it can be inferred that many older adult residents will choose to age in their current surroundings. Nonetheless, Wilder Research Center recognizes that more minority older adults live in poverty in Ramsey County than their white counterparts.[37] In past reports, Wilder Research Center also indicated a continual need to offer multi-lingual, multi-cultural programs, given that the number of elderly residents (age 65 years and older) in Saint Paul that are African Americans have increased by 23 percent; elderly Asian-Americans increased by 93 percent; and elderly Latinos have increased by 23 percent.

Need. Elderly and Frail Elderly need a wide spectrum of housing alternatives. In recognition of the aging process, elderly Saint Paul residents will continually need affordable housing options, accessible design modifications, and supportive services. With a growing aging population, Saint Paul will experience increasing demand for programs that support home ownership, such as low-interest home improvement loans for rehabilitation/maintenance and accessibility modifications, affordable rental housing options, and assisted living housing alternatives. At the same time, many older adults will face their senior years with less financial stability as there will be fewer younger workers to support the social security and health care systems. Finally, the group of adults over 85 will grow annually for the next twenty years and place significant demands on both institutional and community-based long-term care services. [38]

---

[34] 2009 CHAS, Table 6.
[35] U.S. Census Bureau, 2008 American Community Survey.
[36] U.S. Census Bureau, 2006-2008 American Community Survey.
[37] The Changing Face of Aging in Minnesota, Trends and Issues, Wilder Research Center, January 2007.
[38] Older Adult Services: Trends and Issues, a Wilder Foundation Discussion Paper, Wilder Research Center, October 2006.

Elderly Homeowner Needs. In Saint Paul, approximately 15,570 elderly residents are homeowners. However, many Saint Paul elderly home owners lack sufficient income to maintain their homes as 2,645 elderly Saint Paul homeowners that have incomes of less than 50 percent of the AMI report housing problems.[39] Therefore, it can be concluded that affordable home improvement loan programs for substantial repairs and energy conservation improvements are constantly needed. Additionally, elderly homeowners would benefit from knowing about utility payment supplements, maintenance care services, mortgage foreclosure prevention remedies, and reverse mortgages, in order to maintain their home ownership.

Elderly Renter Needs. In Saint Paul, approximately 6,800 elderly households live in private market or rent-restricted housing. Still, approximately 3,230 Saint Paul elderly renters with incomes less than 50 percent of the AMI report housing problems.[40] Consequently, the City of Saint Paul has a continual need for affordable rental housing, especially with changes in Section 8 funding.

Elderly Need for Accessible Housing or Supportive Services. More elderly residents will need accessibility modifications as 55 percent of Saint Paul homeowners ages 75 years or older and 43 percent of elderly homeowners ages 62 - 74 years old report housing problems due to personal mobility or self-care limitations (e.g., difficulty with walking or difficulties with bathing, dressing, or taking medications).[41] Furthermore, changing elderly demographics will also create new housing markets as more residents with limited mobility demand housing alternatives with universal design features, such as main floor living, step-less entries, and wider doors. Finally, with advances in medical technology, more elderly residents and frail elderly residents will require constant supportive services as they live longer independently.

Special Needs of Persons with Developmental Disabilities

According to the federal government,[42] a developmental disability is a severe, chronic disability that is attributable to mental or physical impairments that are manifested before the individual attains age 22 and likely to continue indefinitely. Moreover, developmental disabilities are substantial functional limitations in several major life activities, such as self care, receptive and expressive language, learning, mobility, self direction, capacity of independent living, and economic self-sufficiency. This definition also reflects the individual's need for special interdisciplinary services and individually coordinated support services.

Total Population. Ramsey County Community Human Services estimates that approximately 4,500 Saint Paul residents have developmental disabilities. However, actual numbers of persons with disabilities is difficult to determine as government programs serve only persons with developmental disabilities eligible under federal, state, and county programs. Currently, Ramsey County Community Human Services provides case management services to 1,186 City residents, of which approximately 300 residents are ages 14 years or younger; 131 residents are ages 14-21 years old; 392 residents are ages 22-39 years old; and 363 residents are ages 40 years and older.

---

[39] 2009 CHAS dataset, Table 5.
[40] 2009 CHAS dataset, Table 5.
[41] SOCDS CHAS Data: Housing Problems Output for Mobility and Self Care Limitation, HUD Consolidated Plan Manual.
[42] Developmental Disabilities Assistance and Bill of Rights Act Amendments of 1996.

Need. According to Ramsey County Community Human Services, there are currently enough group homes to assist persons with development disabilities who qualify for those services. However, recent state legislative directives placed a future limit on number of group homes. Consequently, more residents with developmental disabilities will be required to secure housing in the private housing market since there will be less group home options. At the same time, there are limited opportunities to secure affordable housing or affordable supportive housing for persons with development disabilities who do not qualify for group homes. While Ramsey County Community Human Services provide case management to 886 Saint Paul residents (ages 14 years and older), 141 individuals do not qualify for group home services. Still some developmentally-disabled individuals have Section 8 vouchers, but many lack affordable housing opportunities. Their housing needs are further exacerbated by the fact that many disabled citizens receive only social security income or earn extremely low wages. Housing search is also more difficult as persons with developmental disabilities must find housing appropriate to their individual needs, income, and family size. Finally, many persons with developmental disabilities can live independently if they receive supportive services. Conversely, individuals who do not receive supportive services are at constant risk of being homeless.

Special Needs: Supportive Housing. According to Ramsey County Community Services, many high-functioning disabled persons must live independently because their life skills exceed government eligibility requirements for group home placement. Still, these high-functioning individuals with development disabilities remain at risk of being homeless as their incomes are often insufficient to pay housing costs.

Thus, there is a need for supportive housing opportunities, apartments or single room occupancy with supportive services that empower individuals with developmental disabilities to live more independently while ensuring that rent is paid, medications are taken, or guidance to resolve daily life challenges is given.

Special Needs: Accessible units. According to the Minnesota State Council on Disability, there is a constant need for more housing with universal design features or visitability features that allow persons with limited mobility to use a residence. Universal design offers many design features to accommodate persons with limited mobility. In contrast, the less-costly visitability features include one stepless entry, 32-inch wide doorways, and one main level bathroom. Either way, universal design and visitability-designed housing reduce social isolation as more persons with developmental disabilities or persons with limited mobility can more readily access housing.

Special Needs of Persons with HIV/AIDS

Housing Opportunities for Persons with AIDS (HOPWA) Program provides HUD funds to assist low income persons living with HIV/AIDS and their families. HOPWA predominantly serves very low-income (at or below 30 percent of the AMI) or very low income persons (at or below 50 percent of the AMI). HOPWA assists persons with HIV by providing emergency housing assistance, rental assistance, and support services so that persons with HIV can live in safe and decent housing.
Currently, Minnesota Housing Finance Agency administers HOPWA for the eligible seven-county metropolitan area (EMA). Consequently, City of Saint Paul does not directly receive or administer HOPWA funds. Nonetheless, the HOPWA funds are insufficient to meet the housing needs of low income residents living with HIV/AIDS.

Total Population. According to the State of Minnesota Health Department, 860 residents with HIV/AIDS live in Saint Paul.[43] Additionally, based upon past interviews, the Minnesota Aids Project estimates that 65 percent of the persons living with HIV/AIDS own their own home or rent apartments. On the other hand, it can be extrapolated that 33 percent of the persons living with HIV/AIDS are precariously-housed. Additionally, approximately 33 percent of persons living with HIV/AIDS are families.

Persons living with HIV/AIDS most often have lower incomes. According to the HIV Needs Assessment conducted by the Minnesota HIV Services Planning Council, seventy-three percent (73 percent) of the Minnesotans living with HIV reported incomes of $12,000, and 10 percent live on $18,000 or more. For medical reasons, persons living with HIV may have difficulty maintaining long-term employment. Consequently, their incomes are often reduced to Social Security, which is approximately $684/month for a single individual.

Need. Most important, persons with HIV/AIDS need affordable housing. According to the 2000 Needs Assessment prepared for the Minnesota HIV Services Planning Council, 52 percent of all HIV-positive individuals interviewed reported that finding affordable housing was a problem. Using 30 percent of income to determine housing affordability, a resident with HIV/AIDS receiving Social Security Supplement could afford a monthly housing cost of $205. Virtually, all adults receiving SSI benefits without government housing assistance qualifies under federal guidelines as households with "worst case" housing needs. Thus, persons living with HIV/AIDS have a strong need for affordable housing, rental housing, mortgage assistance, and supportive housing alternatives.

Special Needs. Persons with HIV/AIDS need stable housing in order to maintain their health and regulate their medications. In recognition of medical needs, persons with HIV/AIDS may prefer independent housing units (with kitchen and bathroom) because many medications need refrigeration. On the other hand, persons with HIV/AIDS may need supportive housing or supportive services to promote independent living.

Special Needs for Persons with Physical Disabilities

The Americans with Disabilities Act of 1990 (ADA) defines disability as a "physical or mental impairment that substantially limits one or more of the major life activities." According to the U.S. Census, persons with a disability are persons who have difficulty performing one or more activities of daily living (seeing, hearing, speaking, lifting, carrying, using stairs, and walking).[44] Persons with severe disabilities often are unable to perform one or more activities, use an assistive device to get around, or need assistance from another person to perform basic activities. It should be further noted that definitions of disabilities have changed over the last decade, and new definitions now emphasize functional status and a continuum of degrees of ability. So, disability status now includes the traditionally acknowledged disabilities and many non-apparent disabilities that are based on chronic health conditions -- like arthritis, heart disease, back problems -- that impact function.

Population. According to the Minnesota State Council on Disabilities, the prevalence of disabilities in

[43] HIV/AIDS Prevalence and Mortality Tables 2008, Minnesota Department of Health.
[44] U.S. Census: Survey of Income and Program Participation (SIPP).

Minnesota is difficult to determine since a comprehensive state-specific study has not been done since 1976. According to the 2000 Census, approximately 15 percent of Minnesotans have a disability. The 2009 CHAS dataset also reports that the City of Saint Paul approximately 10,755 households contain individuals that have mobility concerns or self-care limitations.[45]

Need. Persons with physical disabilities need more affordable housing opportunities. Even though the 2000 Census reports that 65 percent of Minnesotans with disabilities work, persons with disabilities are still more likely to live in poverty than persons without disabilities.[46] Furthermore, persons with disabilities want opportunities to be fully integrated into society which correspondingly implies that society must continue to remove physical barriers to employment and housing.

Critical Housing Need. Persons with physical disabilities need more housing opportunities that can be easily entered and used. Thus, universal design and visitability-designed housing is a critical need for persons with physical disabilities. In the past, the Mayor's Advisory Committee for Persons with Disabilities recommended that universal or vistability design standards be incorporated into the City's housing programs, such as home improvement programs, home modifications, and new construction. Moreover, the Mayor's Advisory Committee recognizes that universal designed properties accommodate even more people, such as children, elderly, frail elderly, and all persons with limited mobility. Simply put, housing with universal design or visitability standards allow more persons to live comfortably in their homes regardless of their physical abilities. Finally, universal design features, housing modifications and supportive services are often essential to assist persons with disabilities achieve self-sufficiency and full employment.

Special Needs for Persons with Chemical Dependency

Population. Addiction to alcohol or drugs is a primary, chronic illness that has behavioral consequences. According to US Department of Health and Human Services estimates, seven percent of any given population has chemical dependency issues regardless of their economic status. Still, the Minnesota Department of Human Services considers addiction to alcohol or drugs as a chronic medical illness that can be successfully treated.

Need. Persons with chemical dependency often need affordable housing that is located in "drug-free" neighborhoods to avoid further relapses. Affordable private market housing is also essential for individuals with chemical dependency who are ineligible for public housing because of past behavioral problems and poor tenant history. According to Ramsey County Community Services, there is a need for chemically-free transitional housing that is affordable for men and women coming out of treatment. Most often, these individuals could use board and lodging facilities while they earn income to live independently. More supportive housing is also needed for chronically chemically-dependent persons who have co-occurring mental illness. Finally, safe haven facilities are needed for chronically-inebriated residents.

Special Needs for Persons with Mental Illness

Population. The National Institute of Mental Health estimates that 22.1 percent of the general

[45] 2009 CHAS dataset, Table 6.
[46] Minnesota State Council on Disabilities Report on 2000 Census.

population has a diagnosable mental illness in any given year, including short-term acute mental illness and long-term serious mental illness that result in major impairments in functioning, and 8.3 percent of this adult population has a serious mental illness (SMI). The State of Minnesota Department of Human Services, Division of Mental Health also estimates that 2.6 percent of the 8.3 percent adult population has serious and persistent mental illness (SPMI), which lasts longer than two years, and has significant functioning impairments which requires hospitalization. Using these definitions, the City of Saint Paul has approximately 5,594 adult residents with serious and persistent mental illness.

Outstanding Need. The Housing Mission of the Minnesota Comprehensive Mental Health Act encourages all persons with mental illness to live in stable affordable housing, which maximizes community integration, encourages empowerment to select housing from those living environments available to the general public, and provides necessary support regardless of where persons with mental illness choose to live. The Minnesota Department of Human Services and Ramsey County Community Human Services also consider affordable housing as a priority concern for individuals with serious and persistent mental illness, especially for those individuals whose social security income is insufficient to pay market rent housing.[47] According to the State of Minnesota, some psychiatric hospital patients and residential treatment residents must also wait for discharge until housing is available. This lack of affordable housing may further worsen if current federal proposals further limit the availability of Section 8 rental subsidies. Finally, individuals with mental illness have different housing needs than persons with development disabilities. Persons with mental illness are considered competent to make their own decisions. Consequently, there are fewer supportive housing options for persons with mental illness.

Special Needs of Persons with Limited English-speaking Proficiency and Refugees

Population. The 2006-2008 American Community Survey indicates that 15 percent of the total population living in Saint Paul was foreign-born, which is an 8 percent increase since 1990. Based upon the 2008 American Community Survey, Saint Paul has 41,302 foreign-born residents. Approximately 54 percent of foreign-born Saint Paul residents were born in Asia, and 27 percent of foreign-born Saint Paul residents were born in Latin America. It should be further noted that Saint Paul has many new Americans, as approximately 22,070 foreign-born Saint Paul residents entered the US during 1990-2000.

Saint Paul has approximately 24,000 Hmong residents, which represents the largest urban Hmong population in the United States. Furthermore, during 2004-2005, Saint Paul received Hmong refugees from the Wat Tham Krabok camp, which created an estimated immediate housing need of 550 new households. The actual number of refugees may be higher, and the City of Saint Paul may also experience a significant net in-migration as refugees relocate from other states. Additionally, approximately 61 percent of the Wat Tham Krabok refugees were younger than 18 years old, and 28 percent of these refugees were 19-44 years old.

According to the 2000 Census, Saint Paul also has 2,738 Vietnamese residents. According to Vietnamese Social Services of Minnesota, many Vietnamese refugees and immigrants struggle with barriers towards self-sufficiency because of lack of transferable job skills, poverty, and cultural and language differences. Twenty-one percent of Vietnamese residents in Ramsey County are below the poverty level, and thirty-

[47] According to the State of Minnesota, almost 50 percent of the people receiving public mental health services statewide are out of the workforce. Twenty-five percent of the residents receiving public mental health services in the metropolitan area are employed, and also the highest number unemployed but hopeful of finding work (20 percent). State of Minnesota *The Community Mental Health Federal Block Grant Annual Survey Summary Adults*, *2003 Mental Health Management Report*.

six percent of Vietnamese residents who are 25 years or older do not have a high school diploma or equivalent.[48] Saint Paul also has an emerging Karen community who are an ethnic minority fleeing from Burma. Over the past six years, approximately 2,500 Karen refugees have settled in Minnesota – most of them residing in Saint Paul or Roseville. According to Vietnamese Social Services of Minnesota, two to three new Karen families arrive in Twin Cities every week – either directly from refugee camps in Thailand or as secondary migrants from other states. Few Karen adults (4 percent) have graduated from high school, and as formerly subsistence farmers in Burma, few Karen refugees have transferrable job skills applicable to an urban market. Finally, with larger families, Karen refugees face significant barriers in securing affordable housing.

Need. The 2008 American Community Survey states that 56,372 Saint Paul residents speak a language other than English at home (23 percent). Asian languages (50 percent) and Spanish (30 percent) were among the most common. The 2008 American Community Survey also reports that 56,372 of Saint Paul residents (aged 5 years and older) spoke different languages other than English, and 12 percent of the City's population (29,770) reported speaking English less than "very well."

For newly-arrived refugees, stable affordable housing remains a major concern even while the Saint Paul community takes great steps to meet their medical, clothing, and educational needs. Refugee families still must secure affordable housing that is adequate for their family size at private market rents as government-subsidized housing is often not available. Even with Minnesota Family Investment Program (MFIP) assistance, the refugees lack sufficient income to pay housing costs while simultaneously learning a new language, new culture, and marketable job skills.

The *Regional Analysis of Impediments to Fair Housing* also identified that the Limited English Proficient (LEP) populations are often unable to access housing information in their primary languages which correspondingly limits their fair housing choice. In response to the needs of multi-lingual residents, the Saint Paul Planning and Economic Development Department developed a Limited English Proficiency Plan which identifies primary language groups (listed in size order) as Hmong, Spanish, Somali, Serbo-Croatian, Vietnamese, and Oromo.[49] The City also can access other language translators as necessary. The City will be proactive in providing notification of its services through media outreach, websites, and other forums during 2010.

Summary of service of Special Needs in our diverse community

While the City of Saint Paul is aggressively providing financing for supportive housing, the overall demand remains overwhelming, especially in light of changing state and federal budgetary priorities. Nonetheless, the City will offer its current programs as the City actively works with its funding partners to produce affordable housing opportunities – even in the current economic downturn. During the next five years, the City will continue to serve low and moderate income residents.

§91.205(d) Lead-based Paint Hazards

The City of Saint Paul consulted with Ramsey County Public Health Lead-Based Paint Division. According to the 2009 CHAS dataset, Saint Paul has 107,230 housing units of which 88 percent of the properties

[48] 2008 American Community Survey.
[49] Saint Paul Department of Planning and Economic Development – Limited English Proficiency Plan.

were built prior to 1979 (the year when lead-based paint was banned). The City has approximately 42,411 housing units that contain lead-based paint hazards and are occupied by low and moderate households, as defined in Section 1004 of the Residential Lead-Based Paint Hazard Reduction Action of 1992. Lead-based paint hazards exist primarily in older homes with chipping, peeling, or crumbling paint. These older homes are most likely to be found in neighborhoods with the highest levels of poverty. At-risk children in these neighborhoods are less likely to receive appropriate medical checkups. These combined factors produce a serious risk of exposure to lead-based paint. The following tables, which are based on 2009 CHAS data as well as assumptions from the National Center for Healthy Homes, provide an overview of the housing units with lead -based paint hazards.

Fig. 19. Renter Households

Year Structure Built	Total Housing Units	Housing units occupied by low and moderate income households[1]	Estimated percent of units with lead-based paint risk[2]	Estimated number of units with lead-based paint risk[2]
Pre-1940	15,355	11,660	90%	10,494
1940-59	7,400	6,110	80%	4,888
1960-79	15,475	12,785	62%	7,927
Total estimated renter households with high LBP risk =				23,309

Fig. 20. Owner-Occupied Households

Year Structure Built	Total Housing Units	Housing units occupied by low and moderate income households[1]	Estimated percent of units with lead-based paint risk[2]	Estimated number of units with lead-based paint risk[2]
Pre-1940	34,245	12,925	90%	11,633
1940-59	16,655	7,295	80%	5,836
1960-79	5,655	2,635	62%	1,634
Total estimated owner households with high LBP risk =				19,102

Fig. 21. Summary Table - All Households by Age of Unit

Year Structure Built	Housing units occupied by low and moderate income households	Estimated number of households at 0-80% of AMI with lead-based paint risk
Pre-1940	24,585	22,127
1940-59	13,405	10,724
1960-79	15,420	9,560
Total	53,410	**42,411**

Notes to Figures 19-21:
1. Data is taken from Tables 12 and 13 of the CHAS 2009 dataset.
2. As lead paint was banned in 1979, housing units built before 1979 are more likely to have lead paint; the National Center for Healthy Homes' assumptions are used about the percentage of homes "at risk for lead-based paint," by building era. In addition, children are more at risk for lead poisoning than adults.

§91.210 Housing and Market Analysis

§91.205 (a) General Characteristics of the Housing Market

The housing portion of the housing and market analysis section provides an overview of the City of Saint Paul's housing stock. The discussion focuses on housing supply, demand, and condition, vacant or abandoned buildings and their suitability for rehabilitation, public and assisted housing and preservation needs, and areas of concentration. This analysis makes use of data obtained from the 1990 and 2000 U.S. Census Bureau, 2009 CHAS dataset provided by HUD, Housing Link, the City of Saint Paul Public Housing Authority, and other sources.

As in cities across the country, Saint Paul's housing market has been impacted by the ongoing recession beginning in the mid-2000s, including the mortgage foreclosure crisis. Other factors that influence the housing market include budget decreases at all levels of government, population change and transition, and increased housing costs. Since the submission of the 2005 Consolidated Plan, Saint Paul finalized its Housing 5000 program. During 2000-2005, the Housing 5000 program included a large amount of new construction of both ownership and rental options, including a variety of affordable housing units.

Fig. 22. New affordable housing production financed under Housing 5000

Housing 5000 Production with City/HRA financing (2002-2005)					
		Units affordable to households at:			
	Total	**30% of AMI**	**50% of AMI***	**60% of AMI***	**80% of AMI***
Ownership units	1,534	30	167	199	382
% of total		2%	11%	13%	25%
Rental units	2,695	558	983	1,821	1,930
% of total		21%	36%	68%	72%
Total units w/ City/HRA financing	4,229	588	1,150	2,020	2,312
% of total		14%	27%	48%	55%
All Housing 5000 units	5,371	600	1,171	2,047	2,350
% of total		11%	22%	38%	44%

*Unit totals and percentages are cumulative, i.e., the total number of units (and percentages) affordable at 60% of the AMI include those affordable at 50 and 30% of the AMI.

Source: City of Saint Paul Housing Scorecard

Housing 5000 was a five year period that emphasized new housing production over other types of housing activities, and the program placed a high demand on the Housing and Redevelopment Authority's flexible housing resources, many of which are not available today.

Previous policy committed the City and the private market to an overall citywide goal of 20 percent of new housing production (either rental or ownership) to be affordable to households with incomes at 50 percent or less than the area median income, with at least half of the units (10 percent) affordable to households at 30 percent of AMI. The City more than met this goal in financing the development of more than 1,150 housing units affordable to 30 and 50 percent of AMI (27 percent of new production was affordable to incomes at or below 50 percent of the AMI, and 55 percent of the units were affordable to incomes at or below 80 percent of the AMI). New City policy, adopted under the Housing Chapter of the Comprehensive Plan, commits the City/HRA to finance:

- At least 30 percent of new rental housing produced to be affordable to households earning **60** percent of the AMI, of which at least one third will be affordable to households earning **50** percent of the AMI, and at least one third will be affordable to households earning **30** percent of the AMI; and
- At least 20 percent of its new ownership housing produced to be affordable to households earning up to **80** percent of the AMI, and an additional 10 percent to be affordable to households at **60** percent of the AMI.

Housing Supply

Saint Paul has a traditional housing stock that consists of single family detached homes, single family attached homes including townhomes and twinhomes, duplexes, triplexes, apartments, and condominiums. Since 2000, over 5,300 new housing units have been constructed in the City of Saint Paul, most of these financed during the Housing 5000 program. The 2009 CHAS dataset indicates that there were approximately 113,285 total housing units in Saint Paul, which were approximately 94.7 percent occupied and 5.3 percent vacant. Occupied housing units were about 57.7 percent are owner-occupied and 42.3 percent renter-occupied.

Saint Paul has an aging housing stock that is historically and/or architecturally significant. Fig. 23 below shows that approximately 45 percent of the housing units in Saint Paul were built before 1940.

The City has experienced vacant building and foreclosure crises over the past few years, particularly among its single family and duplex housing stock. The crises have affected rental as well as ownership housing, and they are born out by the 2009 CHAS dataset as well as the City's Registered Vacant Building List.

Fig. 23. Housing Units by Year Structure Built

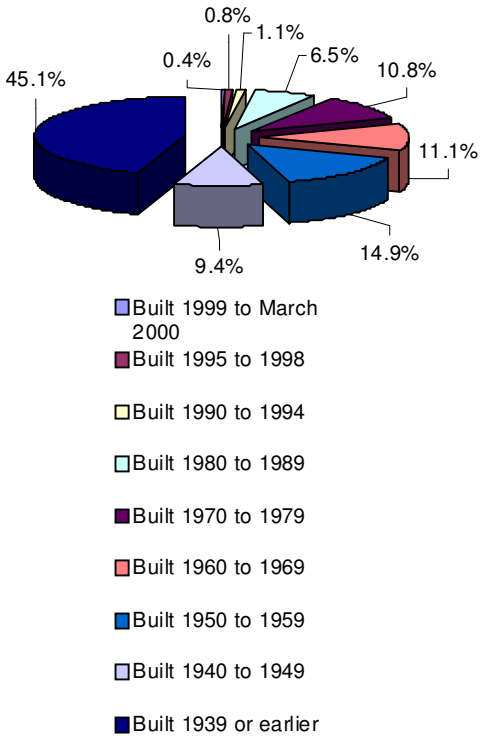


Fig. 24. Vacant Units, by Tenure

	Total	% of total vacant, by tenure
Renter	4,605	9%
Owner	1,445	2%
Total	6,050	5%

Source: 2009 CHAS dataset

Fig. 25. Vacant Units, by Property Type

Property Type	# properties	% of vacant properties
Single Family Residential	1,038	66%
Duplex	423	27%
Multifamily	62	4%
Mixed Use	5	0%
Commercial	52	3%
Total	1,580	100%

Source: City of Saint Paul Registered Vacant Building List, 1/19/10

- Home sales and owner-occupied housing values increased over the late 1990s and early 2000s, but have stabilized and decreased (respectively) since the mortgage foreclosure crisis started in 2005-2006. While 2000 Census and American Community Survey data illustrates the large appreciation in housing values that led up to this crisis in 2005 – with the median value of owner-occupied homes increasing from $105,000 in 2000 to $200,100 in 2005 – the same data does not adequately capture the decline in values since the middle of the decade.[50] The regional Multiple Listing Service shows the declining trends in the number of homes sold, as well as the declining sales prices, indicative of a larger decline in housing values across the city.

Fig. 26. Number of Homes Sold, Regional Multiple Listing Service

		2005	2006	2007	2008	**Percent Change**, 2005-08
	13-County Metro Area	57,283	47,906	40,049	38,746	-32.4%
	City of Saint Paul	3,961	3,399	2,753	3,065	-22.6%
Selected Saint Paul neighborhoods	Phalen	455	366	241	397	-12.7%
	Hillcrest/Hazel Park/ Dayton's Bluff	736	564	484	642	-12.8%
	Riverview Cherokee	168	147	97	135	-19.6%
	Homecroft/W. 7th	113	102	98	122	8.0%
	Central	356	291	228	368	3.4%

Source: Saint Paul Area Association of Realtors, www.spaar.com/public/index.php?strWebAction=market_info_category&intCategoryID=4.

- Rental prices have stabilized during the current recession, despite the high number of households experiencing foreclosure (and the otherwise expected upward pressure on rents). The median gross rent in Saint Paul went from $565 in 2000 up to $732 in 2005, and dipped slightly to $704 in 2008.[51] (More recent data from late 2009 show a flattening out of rental rates due to weak demand).[52]

[50] The 2005 figure was taken from the American Community Survey. The American Community Survey indicates that the median value of owner-occupied housing in Saint Paul continued to increase after 2005, to $211,200 in 2008.
[51] American Community Survey, 2005 and 2008.
[52] Feyder, Susan. "Apartment building owners have more space on their hands." Star Tribune 15 Feb. 2010: D1.

Fig. 27. Median Sales Price of Homes Sold, Regional Multiple Listing Service

		2005	2006	2007	2008	**Percent Change,** 2005-08
	13-County Metro Area	$228,900	$230,000	$225,000	$195,000	-14.8%
	City of Saint Paul	$195,000	$199,000	$190,000	$145,200	-25.5%
Selected Saint Paul neighborhoods	Phalen	$177,675	$176,450	$157,250	$89,000	-49.9%
	Hillcrest/Hazel Park/ Dayton's Bluff	$178,950	$176,000	$162,500	$93,250	-47.9%
	Riverview Cherokee	$182,250	$187,686	$182,700	$105,000	-42.4%
	Homecroft/W. 7th	$179,000	$180,290	$180,000	$134,500	-24.9%
	Central	$160,000	$153,000	$130,000	$55,000	-65.6%

Source: Saint Paul Area Association of Realtors, www.spaar.com/public/index.php?strWebAction=market_info_category&intCategoryID=4.

- The rental vacancy rate declined slightly since the mid-2000s, to just over 6 percent in 2008 from a peak of 10 percent in 2005 (A healthy vacancy rate is around 7- 8 percent).[53] However, during 2009, vacancies spiked again. Specifically, between the first quarter of 2009 and the end of the year, the Twin Cities Metro Area's vacancy rate for market rate rental units went from 4.9 percent to 7.3 percent,[54] and non-Downtown Saint Paul market rate vacancies also climbed above 4.0 percent.[55] During 2009, the Downtown Saint Paul market rate rental vacancy rate climbed from 6.9 percent to 10.1 percent.[56] Downtown Saint Paul's affordable units had a low vacancy rate as of the first quarter of 2009 – 2.1 percent.[57]
- Part of the increase in Twin Cities' rental vacancies in late 2009 is attributed to the federal tax credit for first-time homebuyers, which has prompted many renters to take advantage of the tax break as well as the low housing prices in the current market.
- While foreclosures have and are creating some increased rental demand, it is not enough to keep vacancies very low. Higher rental vacancies and a lower level of demand in the Twin Cities are expected to continue exerting a downward pressure on rents, at least until the economy recovers.
- As many as 1,181 Section 236/8 units, 434 Section 202 units, 250 low-income housing tax credits units, and 135 units financed through other means will be expiring in the 2010-2014 period; as federal and state contracts expire, the City will need to take steps to preserve this important existing stock of affordable rental housing, particularly given the low vacancy data on affordable rental housing.

Housing Demand

The Metropolitan Council forecasts that the City will add approximately 7,000 households during the 2010-2020 period, resulting in a clear demand for housing options. While the existing vacant housing stock will partially serve these new households, there is also an anticipated demand for new housing along and near the Central Corridor Light Rail Transit line (expected to be operational by 2014).

---

[53] Around the time the 2000 Consolidated Plan was submitted, the vacancy rate was around 1 percent.
[54] Feyder, Susan. "Apartment building owners have more space on their hands." Star Tribune 15 Feb. 2010: D1.
[55] MHA Perspective 2009, Twin Cities Apartment Market Update, 2009 1st Qtr., Brent Wittenberg, GVA Marquette Advisors, accessed on 2/17/10 at www.gvamarquetteadvisors.com/Documents/Brent%20WittenbergMHAPerspective2009.pdf.
[56] Anderson, Mark. "Apartments empty out in fourth quarter." Finance & Commerce 11 Feb, 2010: 1A.
[57] Market study for affordable rental housing project proposed in Downtown Saint Paul.

Fig .28. New Housing Demand projected for the Central Corridor by 2030

Potential for:	Rental units	Ownership units
University Ave.	3,950-5,050	1,675-2,450
Capitol	150-200	N/A
Downtown	5,000-6,000	500-1,000
Total	9,100-11,250	2,175-3,450

The City recently projected in its NSP2 application that at its 2008 rate of home sales, it would take approximately 6.5 years for the market to absorb the current supply of vacant and foreclosed properties in the NSP2 Target Geography, not including the market supply of other homes for sale in the same neighborhoods. Another factor that will dampen the ownership housing market is the tightening credit market, with mortgages only available to households that have a good credit history and the ability to make a high down payment on a house. In the short term, unsustainable mortgages will continue to fail, and housing foreclosures will remain high. High, persistent unemployment levels will continue to lead people to seek rental housing options. In conclusion, the data above suggest a stable rental market and likely a sustained modest demand for rental units over the next five years, including market rate but especially for units with affordable rents.

Condition

HUD requests that the terms "standard condition" and "substandard suitable for rehabilitation" be defined within the Consolidated Plan. These terms are used when replacement housing is determined to be a desired use of HUD funds. HUD has determined that cities are in the best position to define these terms as they relate to their individual community. As such, Saint Paul has defined the terms as follows:

- **Standard Condition** - Properties which meet the Minimum Property Maintenance Standards for all structures and premises, as defined in Chapter 34 of the Saint Paul Legislative Code.
- **Substandard Suitable for Rehabilitation** - Properties that are not in standard condition, but are structurally and financially feasible for rehabilitation. These properties have no serious structural deficiencies and the cost of rehabilitation to meet the Minimum Property Maintenance does not exceed 50 percent of the appraised value of the property after rehabilitation.

The oldest housing stock in the city is located primarily in areas immediately adjacent to the central core. Greater amounts of low to moderate income populations reside in this area. The figures below indicate that 60 percent of the City's 1-3 unit residential properties fall in the condition categories "unsound" through "average;" this indicates the presence of exterior deferred maintenance items that need to be addressed through rehabilitation. In terms of larger, 4+ unit multifamily properties, 87 percent fall in the condition categories "average" through "excellent," indicating generally better physical condition. However, these figures are estimates based on County data, and up to 10 percent of residential properties have no exterior condition value indicated.

Figs. 29 and 30. Exterior physical condition of residential properties in Saint Paul

1-3 unit properties

Physical Condition	Citywide	% of total citywide
Unsound	20	0%
Very Poor	39	0%
Poor	686	1%
Fair	36,320	49%
Average	7,139	10%
Good	22,245	30%
Very Good	3,626	5%
Excellent	1,589	2%
No value	*2,280*	*3%*
Total	73,944	100%

4+ unit properties

Physical Condition	Citywide	% of total citywide
Unsound	1	0%
Very Poor	0	0%
Poor	7	0%
Fair	279	4%
Average	3,180	40%
Good	2,032	26%
Very Good	1,058	13%
Excellent	610	8%
No value	*720*	9%
Total	7,887	100%

Source. Ramsey County records

There have been systematic efforts to maintain and improve the housing stock through inspection, code enforcement, rehabilitation programs and where necessary, demolition of dilapidated or nuisance properties. The City is conscious of the fact that housing units in substandard condition not only affect the individual household, but can have substantial neighborhood impacts (i.e., becoming an eyesore, causing health or safety concerns, or leading to decreased property values of neighboring units, among other impacts).

Estimate of the Number of Abandoned Buildings and whether they are suitable for rehabilitation

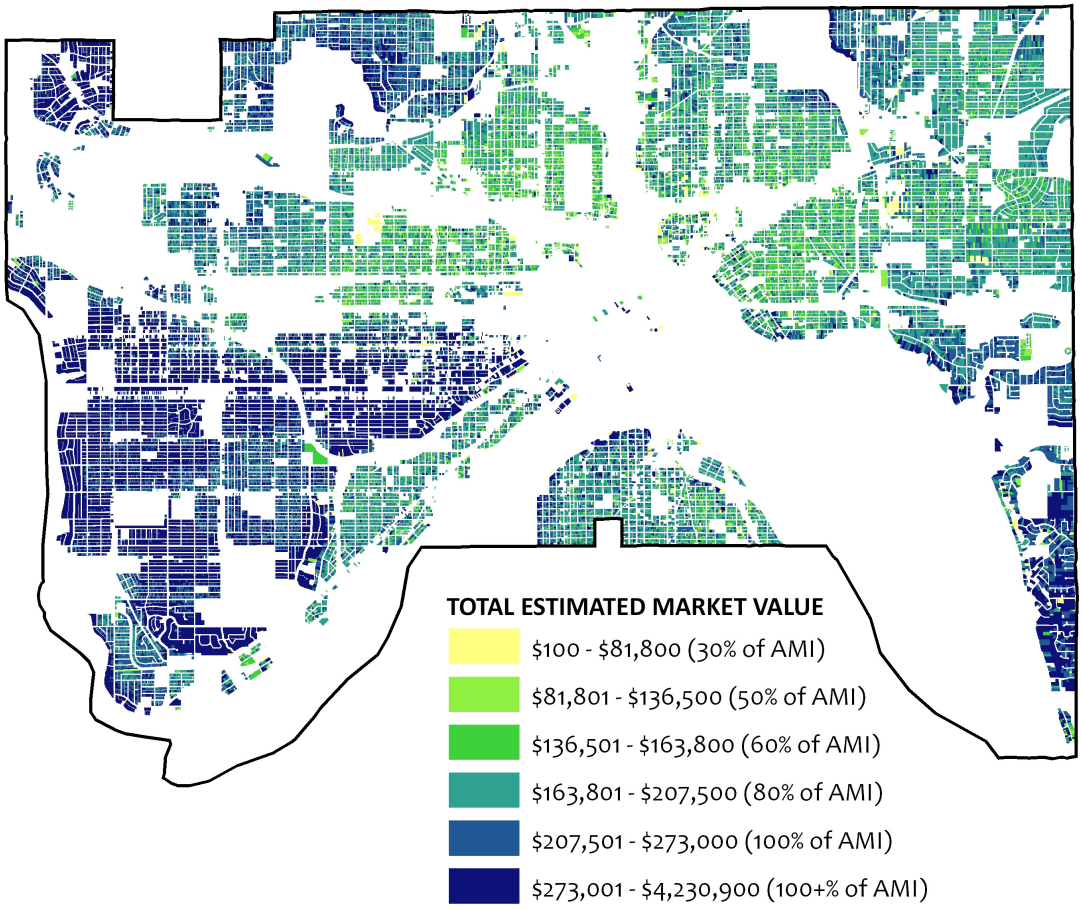
The City's Department of Safety and Inspections maintains a Registered Vacant Building List, which includes proxy data for abandoned buildings. The City classifies vacant properties into three categories, based on physical condition - Categories I, II, and III – and conditions worsen the higher the classification.

Based on the description of "substandard suitable for rehabilitation," listed above, it is the opinion of City staff that a typical category I or II vacant building would generally meet this definition, while a typical category III vacant building would not. If this is assumed true, January 2010 data would then suggest that 1,429 category I and II single family, duplex, and multifamily buildings would be substandard yet suitable for rehabilitation, while 94 category III buildings would be substandard and not suitable for rehabilitation. This estimate may be conservative, as conventional wisdom in the community is that the City's Registered Vacant Building List likely undercounts the actual number of vacant buildings in the city.

Cost of Housing

While Fig. 27 illustrates how the median price of homes sold in Saint Paul has decreased 25 percent over last three years, becoming a homeowner in several Saint Paul neighborhoods is still a difficult proposition for many low and moderate income households. Fig. 31 below shows the affordability of ownership housing in Saint Paul in 2008 (the assessed value is a proxy for sales price).

Fig. 31. Affordability of ownership housing, Saint Paul, 2008



Source: Ramsey County records. Properties include 1-3 unit residential properties, townhomes, and condominiums.
Map based on Twin Cities Area Median Household Income (AMI), AMI assumes a four-person household.

On the rental side, the City and its partners, including the Public Housing Agency, Minnesota Housing, and nonprofit affordable rental housing providers, continue to maintain an inventory of affordable housing options available to households at or below 20, 30, 50, and 60 percent of the AMI (summarized in Fig. 32 below). Based on current data, about 36 percent of Saint Paul's rental housing stock is a unit with public financing or is occupied by a household receiving affordable housing assistance. Saint Paul's task for affordable rental housing clearly involves the preservation of these important housing options.

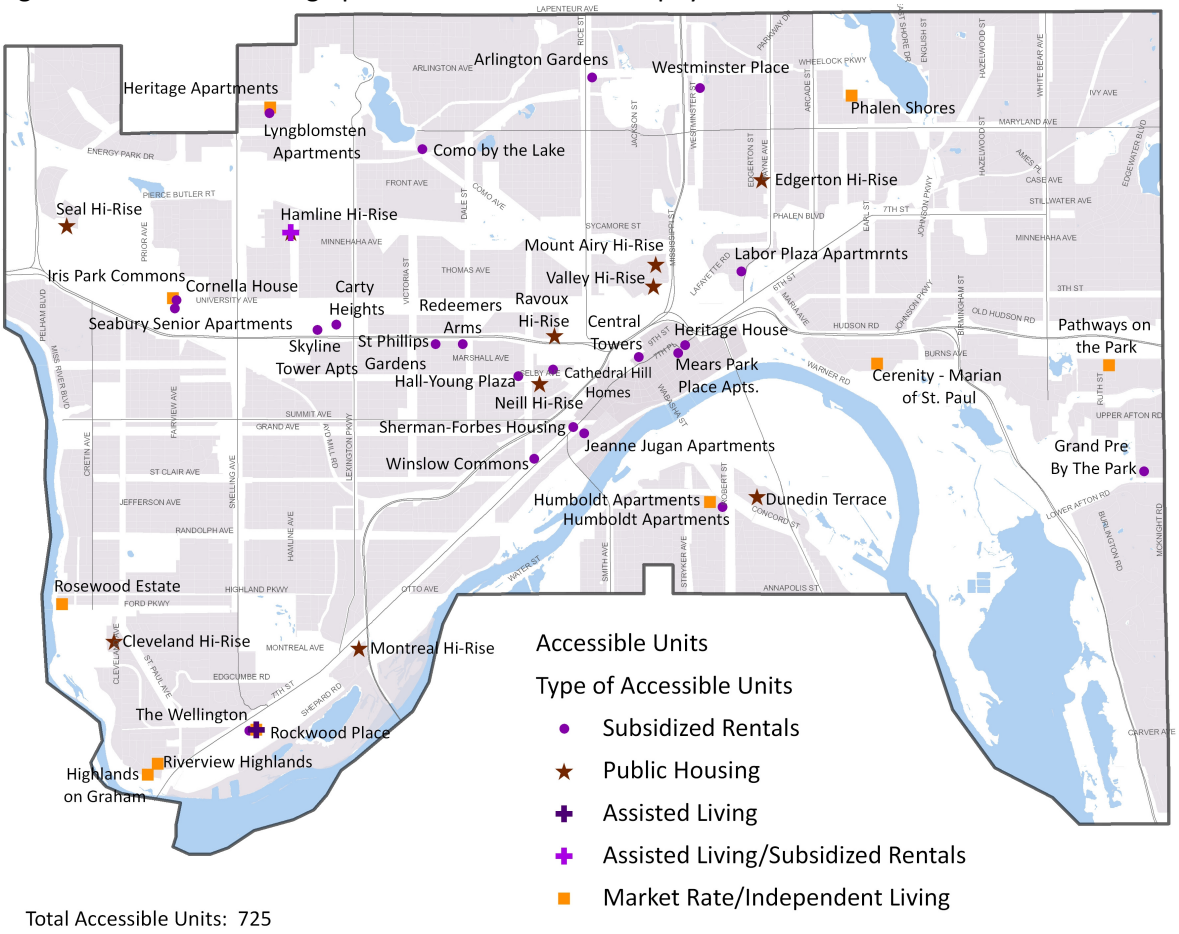
Fig. 32. Affordable rental housing, publicly-assisted units

	Number of			
	Affordable units	**Tenant-Based Section 8 vouchers**	**Supportive Housing Units**	**CRF/ emergency shelter - licensed beds**
Subtotals	10,279	4,232	938	1,011
Total, Publicly-Assisted affordable units or beds	16,460			
Total, occupied rental units	45,360			

Housing stock available to person with disabilities

Below is a map that shows the location of housing developments containing accessible units for individuals with physical disabilities. The total number of accessible units is 725.

Fig. 33. Accessible housing options for individuals with physical disabilities

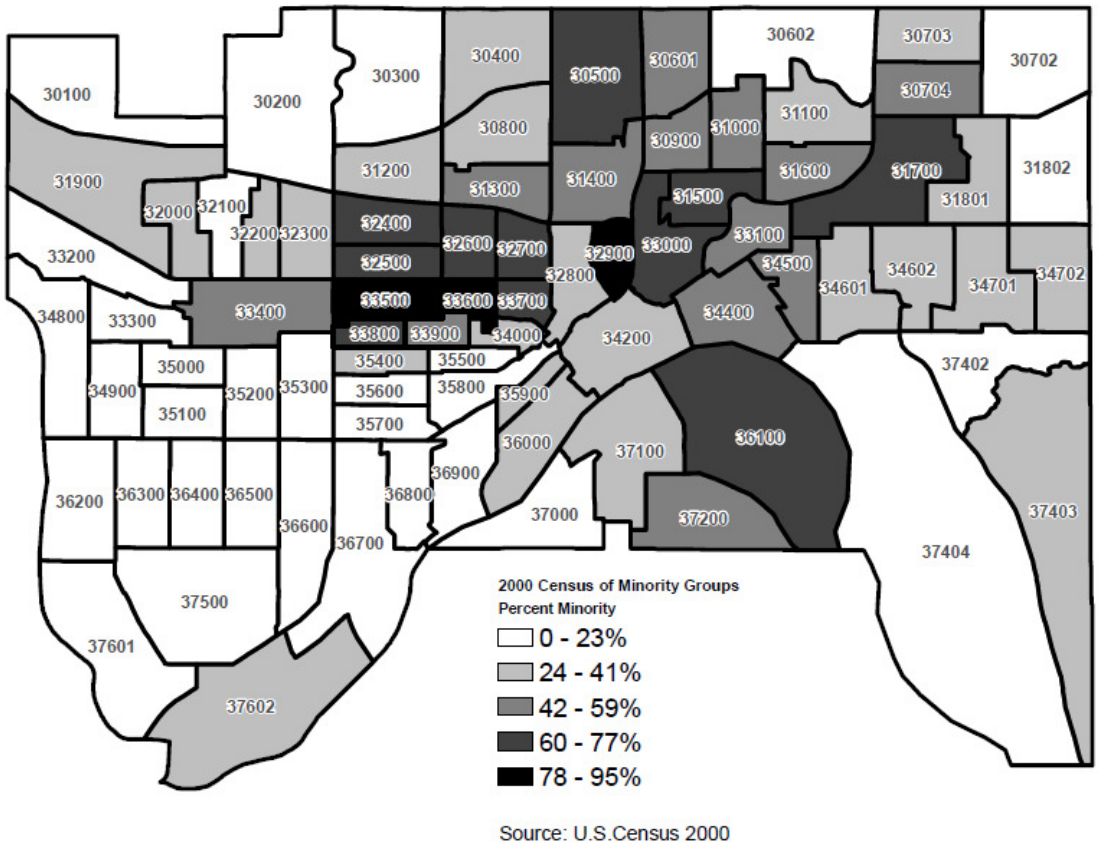


Total Accessible Units: 725

Area of Minority Group Concentration

The City defines an area of minority group concentration as a census tract that has 78 percent or more minority population, a threshold that is equivalent to two times the City's overall minority population, according to the 2008 American Community Survey.[58] Recent immigrants from countries from around the world over the last decade coupled with historic settlement patterns has contributed to the concentration of racial and ethnic communities. Furthermore, the desire or necessity of living in areas with lower housing costs has also contributed to the concentration. Figure 34 indicates that higher concentrations of minority groups are located closer to the downtown core of the City.

Fig. 34. Percent Minority Population, Saint Paul (Census tracts)



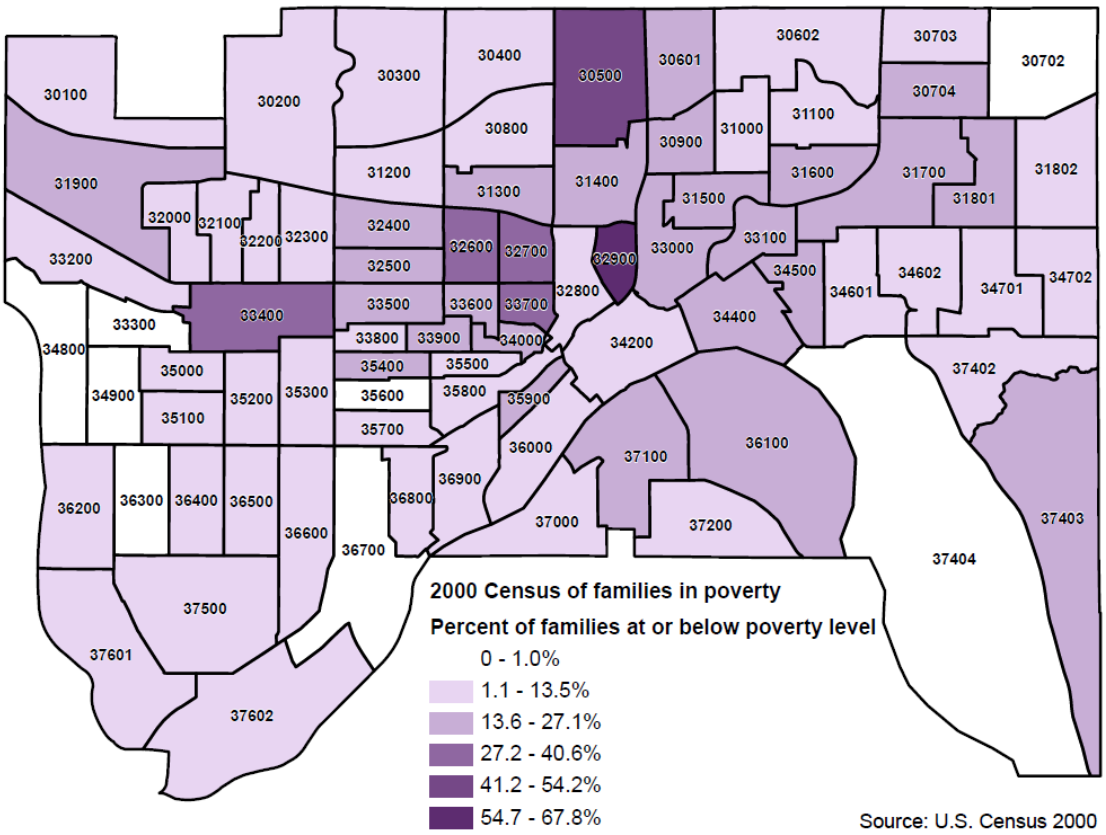
Area of Low-Income Concentration

The location and condition of housing plays an important role in the vitality of the City's neighborhoods. It is affects housing values, educational opportunities, and access to jobs. The City defines an area of low-income concentration as a census tract which has a poverty rate above 27.2 percent, which is twice the City's overall family poverty rate of 13.6 percent, according to the 2008 American Community Survey. According to the same 2008 survey data, 20.2 percent of families with related children under 18 years old are living at or below the poverty level, and 33.3 percent of families with a female householder, no husband present are living at or below the poverty level. Figure 35 below identifies the

[58] Based on 2008 American Community Survey data, 39 percent of the population of the City of Saint Paul is either Black, Asian, American Indian, Hispanic/Latino (any race), Native Hawaiian/Other Pacific Islander, Some other race alone, or Two or More Races.

poverty status of households in 1999 as a percentage of the population for whom poverty is determined. It indicates that a higher concentration of residents with incomes below poverty can be found adjacent to the City's central core.

Fig 35. Percent of families at or below poverty level, Saint Paul (Census tracts)



§91.210(b) Public and Assisted Housing

The City of Saint Paul has approximately 16,460 housing units that are rent-controlled and/or income restricted (representing about 15 percent of the total housing units in the city, or 36 percent of the total occupied rental housing stock). Saint Paul has approximately 4,249 public housing units (of the 10,279 affordable rental housing units citywide, either public or privately-owned and publicly-assisted), 4,232 units receiving Section 8 rental assistance, and 1,949 supportive housing units or emergency shelter/licensed beds.

The City of Saint Paul's Public Housing Agency (PHA) owns and operates the City's public housing units. PHA's mission is to "help families and individuals with low incomes achieve greater stability and self reliance by providing safe, affordable, quality housing and links to community services."[59] The agency maintains a "high performer" status under HUD's Public Housing Assessment System (PHAS). This is achieved through high management, maintenance, and financial standards. The agency also maintains a "high performer" status under HUD's Section 8 Management Assessment Program (SEMAP) which is achieved via high voucher utilization and effectively administering Section 8 Housing Choice Voucher and Project-Based Assistance (PBA).

The PHA serves households with low to extremely low incomes, most of whom have a high housing cost burden. The total population in public housing is approximately 10,000 individuals. The average household size is 4.4 in the family sites and 1.0 in the hi-rises. The average household income is $18,829 in the family sites and $10,934 in the hi-rises. The following is a listing of the core services offered by PHA:

- Public Housing - Administration and Management
- Capital Improvements - Modernization, Asset Preservation and Maintenance
- Special Programs such as the Congregate Housing Services Program (CHSP)
- Section 8 - Housing Choice Voucher and Special Programs such as Tenant-Based assistance and Welfare to Work Program and the Section 8 Moderate Rehabilitation Certificates (the program currently administers 75 single room occupancy units (SRO) at Mary Hall, 438 Main Street).
- Housing policy advocacy

PHA owns and operates 16 hi-rises (2,548 total units) located throughout the City that serve primarily elderly residents (62 years and older) and/or disabled individuals. PHA also owns and operates four family housing developments (1,296 total units) and 405 scattered site units. The agency states that they have maintained a 99 percent occupancy rate for 14 consecutive years. Figure 36 provides a breakdown of PHA's housing units by type and bedroom.

Fig. 36. PHA's Public Housing Units by Type and Bedroom

	0BR	1BR	2BR	3BR	4BR	5BR	6BR	Total
Hi-Rise	124	2,355	68	1	0	0	0	2,548
Family Development	0	98	491	442	205	60	0	1,296
Scattered Site	0	0	0	279	74	47	5	405
	124	2,453	559	722	279	107	5	4,249

[59] The City of Saint Paul Public Housing Agency.

Source: City of Saint Paul Public Housing Agency, 2010.

The demands for PHA's services continue to increase. As of January 2010, approximately 8,200 applicants were on the public housing waiting list. The expected wait time varies and can range from 3-6 months for a one-bedroom unit to 2-4 years for a two-bedroom or larger unit. In 2009, the annual turnover rate for public housing was 13 percent, or 557 units, and this rate stays fairly consistent from year to year. The majority of applicants on the public housing waiting list are minorities. As of December 2009, the racial/ethnic breakdown of public housing waiting list applicants is as follows: 62 percent are African American; 18 percent are White; 15 percent are Asian or Pacific Islander; 2 percent are Native American; and, 3 percent are of multiple races. Fifty-five percent of all applicants are between the ages of 25-49.

The PHA also maintains a waiting list for its Section 8 Housing Choice Voucher Program. As of January 2010, approximately 3,800 applicants were on the Section 8 waiting list. The Section 8 waiting list has been closed to new applicants since November 21, 2002. In 2009, the PHA also received 100 Family Reunification Program (FUP) Vouchers for eligible families and youth referred by the Ramsey County Human Services Department, as well as 35 Veterans Administration Supportive Housing (VASH) Vouchers for homeless veterans referred by the Veterans Administration Medical Center in Minneapolis.

PHA does not plan to expand over the next five years, however, the agency has embarked on several strategies to modernize its units. In February 2009, the PHA received over $10 million in Recovery Act formula-based funding. This funding has gone towards completing modernization work on the McDonough Homes development, installing fire suppression sprinklers and upgrading the fire alarm systems in the Iowa Hi-Rise, and completing modernization of 42 duplex units in the Summit/University area. In fall 2009, the PHA was awarded approximately $7.1 million in Recovery Act competitive funding for four hi-rise buildings. The PHA plans to use these funds for energy improvements including lighting improvements, window replacements, boiler replacements and toilet replacements in its Central, Cleveland, Montreal and Neill Hi-Rises.

PHA has done the following during the last year to meet HUD's handicapped accessibility (Section 504) requirements:

- PHA continues to allocate a portion of the HUD funding provided under the Capital Fund Program for the modification of its housing stock in order to meet the specific individual access needs of existing or new residents on an as needed basis. These reasonable accommodations ranged from installing grab bars in bathrooms, to installing ramps, to widening doors, to modifying kitchen cabinets and counters.
- PHA continued its progress at making a portion of its housing fully accessible in accordance with HUD guidelines, including work to make five percent of the 484 housing units at McDonough Homes wheelchair accessible.
- PHA maintained past improvements at its hi-rises, community centers and other locations that made the common restrooms, common areas, corridors, elevators, parking lots and entries fully accessible.
- PHA built a new PHA Central Administrative Office building that meets all Section 504 ADA requirements.

As previously mentioned, the Saint Paul Public Housing Agency (PHA) is a separate agency independent of the City of Saint Paul. Nonetheless, the City still recognizes the numerous programs that Saint Paul Public Housing Agency provides to residents who have accessibility needs, such as:

PHA Congregate Housing Services Program. The Saint Paul Public Housing Agency administers a Congregate Housing Services Program (CHSP) which provides case coordination, housekeeping, daily meals and monitoring, plus other needed services at six PHA hi-rises to assist frail or disabled residents who are at risk of nursing home placement.

PHA/Wilder Assisted Living Program. The Wilder Assisted Living Program provides comprehensive supportive services to assist frail or disabled residents at risk of nursing home placement at four PHA hi-rises: Ravoux, Dunedin, Hamline, and Edgerton. Basic services include two to three daily meals, 24-hour on-site staff that provide housekeeping, laundry, personal care services, 24-hour day emergency assistance, medication monitoring and a day activity program.

PHA/New Beginnings-Brain Injury Program. Saint Paul Public Housing Agency has 28 apartments in Montreal and Neil Hi-rises in which Accessible Space Inc. provides 24-hour personal care attendant service and support services for residents who experienced brain injuries. This supportive accessible housing includes apartment management, social skills, vocational involvement and a broad array of independent living skills. Residents live in their own apartments and work toward greater independence with the help of a site supervisor and resident assistants.

PHA/Accessible Space, Inc. Saint Paul Public Housing Agency has six apartments at Valley Hi-rise in which Accessible Space Inc. provides 24-hour personal care attendant service and support services for residents with mobility impairments and/or complications from diabetes.

Several strategic goals were outlined in PHA's most recent Five-Year Plan. The goals and new initiatives are summarized as follows:

- Consider other opportunities to increase the affordable housing supply
- Continue PHA's commitment to administering the public housing and Section 8 Housing Choice Voucher programs.
- Continue to manage, maintain and modernize its public housing units to the highest possible standards
- Sustain high utilization rates in both the public housing and Section 8Housing Choice Voucher programs.

No activities covered by the Consolidated Plan are being jointly funded with the City of Saint Paul Public Housing Authority's Comprehensive Grant Program.

The preservation of existing publicly-assisted affordable housing is a key policy of the Housing Chapter of the Comprehensive Plan. During the five-year period of the Consolidated Plan, the preservation and stabilization of existing affordable housing will be a top activity.

The projects listed are a combination of federally-assisted and low income tax credit projects. The project list includes a mix of one, two and three-bedroom units serving primarily low income occupants but with incomes not exceeding 60 percent of AMI. The list represents units that will (or may) need to

be preserved and stabilized during the period.[60] There is not expectation that any of the units will be lost:

Federal Low Income Housing Tax Credit Projects and Unit Count (250 units)
Low Income Housing Tax Credits units are in

- East Side Commons (formerly Bradley Terrace)(48)
- Hamline Park Townhouses* (24)
- Northern Warehouse (52)
- Ramsey Hill Apartments (54)
- McClean Terrace (24)
- Wabasha Terrace (24)
- Minnehaha Court* (24)

Other Federal and State-Assisted Projects and Unit Count (1,750 units)
Section 236/8 units are in

- Afton View* (286)
- Rockwood Place (367)
- St. Phillip's Garden (55)
- Wilder Square, Inc (Coop) (163)
- Wilder Square, Inc (Hi-Rise) (136)
- Shamrock Court* (147)
- Sibley Apartments/Towers of Galtier* (27)

Section 202 units are in

- Lyngblomsten Apartments (105)
- Redeemers Arms (*even if not to be preserved as a Sec 202 anymore*)(82)
- S.E. Hall-Whitney Young Plaza (45)
- Wilder 202 Apts at 516 Humboldt (120)
- Wilder Apts at 508/510 Humboldt (82)

Other units

- Frogtown Family Lofts* (36)
- Como Villa Seniors* (99)

Already Preserved

- Capitol City Townhomes
- Carroll Townhouses* (11)
- Clinton Townhouses* (18)
- Families First* (5)
- Fuller Townhouses* (9)
- Lincoln Townhouses* (18))
- Garden Court* (18)
- Greenbrier Glen* (16)
- Montana Townhouses (13)
- Park Crossing Apartments* (18)
- Rivertown Commons/Como Place/Rice Marion 1(102)

[60] Units marked with an asterisk <u>may</u> need some preservation and/or stabilization work during the 2010-14 period.

- Selby Commons (33)
- Torre de San Miguel (142)
- Van Dyke Townhouses (11)
- Virginia Circle Townhouses (16)
- Vista Village (47)
- Westminister Place (100)
- Winslow Commons (121)

Lost/Converted, etc.

- Goodrich Townhouses (19)
- 754 Payne (12)

§91.210(c) Homeless Facilities and Services

This section includes inventories of the facilities and services that meet the emergency shelter, transitional housing, and permanent supportive housing needs of homeless persons within the City of Saint Paul and Ramsey County. Discussions of ESG, Continuum of Care, and other services for homeless persons follow.

Inventory of Homeless Facilities and Services

The following pages include citywide inventories of emergency shelters for adults and families, domestic violence shelters, emergency/transitional/permanent supportive housing for youth, transitional housing, and permanent supportive housing.

Fig. 37. Inventory of Emergency Shelters for Adults and Families

Emergency Shelters for Adults and Families	**Bed Capacity**
Catholic Charities' *Dorothy Day Extended Hours* provides 170 sleeping mats year-round to homeless adults. Partial funding is provided by the County and the City.	170 mats
Catholic Charities' Dorothy Day Overnight Shelter for Homeless Women provides emergency shelter and support services for homeless women.	44
Catholic Charities' *Mary Hall Shelter for Men* provides 22 beds for sober adult males who are eligible for "Emergency Assistance." Men may stay for no more than 30 days per quarter. Mary Hall facility includes housing and community programs, such as Listening House and Health Care for the Homeless.	22
Catholic Charities/Ramsey County Family Service Center offers emergency shelters for homeless families and single women, including providing housing (up to 30 days), meals and health services.	55
Union Gospel Mission provides 90 emergency shelter beds for single men. Union Gospel Mission also rents 142 single room occupancy units for $145-$180 per month.	90
Saint Paul Council of Churches - *Project Home* is offered by several religious organizations that provide space as an emergency overflow shelter for up to 40 people at a time.	40
Dwelling Place is a faith-based organization that provides emergency housing for single women and children.	12
Total Number of Emergency Shelter Spaces	**433**

Fig. 38. Inventory of Domestic Violence Shelters

Domestic Violence Shelters	**Bed Capacity**
Casa De Esperanza offers 12 beds to battered women and their children who may stay up to 30 days. Casa De Esperanza provides weekly physician visits, meals, on-site support and aftercare program that may include housing search.	12
Eagles Nest (Women of Nations) offers 46 beds to battered women and children including Native American families and all ethnic groups. Eagles Nest provides meals, housing search, children's programs and a community advocacy program.	46
Women's Advocates offers 52 beds to battered women and their children, who may stay up to 60 days. Women's Advocates provides meals, on-site support, housing search and access to medical and legal services as necessary.	52
Total Number of Domestic Violence Shelter Spaces	110

Fig. 39. Inventory of Emergency Housing/Transitional Housing/Permanent Supportive Housing for Youth

Emergency Housing/Transitional Housing & Supportive Housing for Youth	**Bed Capacity**
Ain Dah Yung is a culturally-sensitive, licensed 10-bed residence for runaway and homeless youth, ages 5 - 17 years old. Housing, meals, and supportive services are provided.	10
Beverly A. Benjamin Youth Lodge provides culturally-sensitive supportive housing beds for homeless youth ages 16-21 years old. Housing, meals and supportive services are provided.	6
Lutheran Social Services - Safe House provides six beds for homeless youth ages 16 - 20 years old. Safe House provides housing, meals, supportive services and case management services. Homeless youth can stay up to two months at Safe House.	6
Lutheran Social Services - LifeHaven provides housing for six teen moms and their children in Ramsey County. Life Haven is funded through a generous partnership with a church organization and the U.S. Department of Health and Human Services.	12
Lutheran Social Services – *Resek House* – provides transitional housing for Ramsey County youth 16-21 years of age who are currently homeless. Youth may lease apartments at 30 percent of AMI and receive case management/life skills for up to 24 months.	10
Lutheran Social Services *Youth Transitional Living Program* works with Ramsey County youth ages 16-21 who are homeless or precariously housed. This program assists youth to access market-rate housing and by providing case management/life skills training.	32
Salvation Army *Booth Brown Foyer* Program provides transitional housing and support services for youth.	25
R.S. Eden- *7th Street Passages* provides thirteen supportive housing units for youth and supportive services are provided by R.S. Eden.	13
Model Cities- *Sankofa* provides 15 units of supportive housing to homeless youth and homeless young adults (ages 17-25) who are pregnant or parenting a young child.	30
Face to Face – *SafeZone* provides transitional housing for youth.	5
Freeport West – recently opened a housing facility for youth.	4
Total of Emergency Housing/Transitional Housing/Permanent Supportive Housing for Youth	**153**

Fig. 40. Inventory of Transitional Housing

Transitional Housing – Adults and Families	**Bed Capacity**
Catholic Charities' *Mary Hall* is a transitional housing site-based program for 80 single adults. Mary Hall facility includes housing and community programs, such as Listening House and Health Care for the Homeless.	80
Emma Norton Services – *Transitional Housing Program* provides transitional housing for single women who are homeless or at risk of being homeless due to chemical dependency, mental health challenges or domestic abuse. Transitional housing, meals and case management support services are provided.	42
Peta Wakan Tipi – *Mother Earth Lodge provides* culturally-appropriate site transitional housing for four homeless Native American women who are recovering from chemical dependency.	4
Peta Wakan Tipi – *Sacred Fire Lodge* provides culturally appropriate transitional housing for homeless Native American men who are recovering from chemical dependency	4
Theresa Living Center is a transitional housing facility for single women or women with children (age 5 or younger). Residents must set and pursue goals and they have four to eighteen months to become self-sufficient.	16
Caroline Living Center provides transitional housing by using scattered site housing for 10 single women with children.	72
Union Gospel Mission – *Naomi Family Center provides* transitional housing for women with children (children who are 12 years of age or younger). The program offers on-site day care and job training. The housing is available for up to one year.	85
YWCA – *Transitional Living Program* provides transitional housing and support services to single women and families. Programs include job training, chemical dependency and other educational programs. When ready, YWCA assists women and families work towards independent living.	106
Ethel Gordon Community Care provides transitional housing and support services for single women and children.	30
Breaking Free provides transitional housing for women involved in systems of abuse and exploitation.	8
The Dwelling Place provides transitional housing and partners with social services for supportive services.	7
Wilder Foundation - *The ROOF Project* is a transitional housing project that helps homeless families obtain affordable housing with supportive services. ROOF works directly with private market landlords to secure affordable housing for participating families. ROOF provides counseling to participants improve or acquire skills that relate to maintaining housing including: budgeting, selecting appropriate child care and job search/retention skills.	198
Juel Fairbanks provides culturally-sensitive housing for single adults recovering from chemical dependency.	8
South Metro Human Services – *Rose Center* provides transitional housing with support services for single women with mental health challenges.	7
Total of Transitional Housing Serving Adults and Families	**667**

Fig. 41. Inventory of Permanent Supportive Housing

Permanent Supportive Housing	**Bed Capacity**
Aeon- *Crane Ordway Apartments* provides permanent supportive housing including 14 units for formerly long-term homeless single adults.	14
Catholic Charities – *Mary Hall - Single Room Occupancy* provides permanent supportive housing for single adults.	75
Catholic Charities - *Saint Paul Residence* – provides permanent supportive housing to single adults.	60
Catholic Charities – *Saint Anthony Residence* provides permanent supportive housing using Housing First (harm reduction) model for chronically-inebriated residents.	60
Catholic Charities – *Housing Trust Fund* provides supportive housing for single men and women.	25
Catholic Charities – *St. Christopher's Place* provides housing with support services for single adults.	71
Catholic Charities – *Visitation Apartments* provides eighteen units of supportive family housing.	18
CommonBond Communities – *Commerce Apartments Phase I* provides supportive housing.	9
New Foundation - *Crestview Community Apartments* provides supportive housing to families who have a family member with chemical dependency issues.	88
Jeremiah Project Saint Paul provides supportive housing for single women and children. Jeremiah Program requires participation in educational opportunities or employment activities to facility self-sufficiency.	82
South Metro – Police Homeless Outreach Project Housing provides supportive housing for formerly homeless adults.	27
Model Cities – Families First provides 21 units of affordable permanent supportive housing for single-parent families who are homeless and in recovery from drugs and alcohol. Supportive Services include case management, primary health care, recovery support, parenting education, and life skills training.	63
Hearth Connection - various programs serving residents with mental health challenges	406
People Inc. *Housing First Program* provides supportive housing for single women and men who have mental health challenges.	10
People Inc. Housing First Group Residential Housing provides supportive housing for single women and men who have mental health challenges.	23
Project for Pride in Living – Delancey Apartments – provides permanent supportive housing for single persons with mental health challenges and/or c/d issues.	13
Ramsey County Mental Health provides permanent supportive housing for families who have a family member with mental health issues.	40
Ramsey County Mental Health provides permanent housing program for single women and men who have mental health challenges.	10
Saint Paul Urban League – Martin Luther King Court – provides supportive housing including some HOPWA units.	24
YWCA of Saint Paul *Permanent Housing with Support Services* provides permanent supportive housing to single women and children.	7
YWCA of Saint Paul *Family Intervention Fund* – provides supportive housing to single women and children.	20
YWCA of Saint Paul– *University/Dale Apartments* provides single-site permanent supportive housing to single women and children.	34
YWCA of Saint Paul- *Winnipeg* Apartments provides single-site permanent supportive housing to single women and children.	18
YWCA of Saint Paul– *Cleveland Saunders* provides single-site permanent supportive housing to single women and children.	30

Wilder Foundation – *ROOF Housing Voucher Program* provides supportive housing using scattered site model.	29
Wilder Foundation – *Redeemer Arms* – permanent supportive housing for single adults.	34
Wilder Foundation *Jackson Village*-provides 24 units of affordable housing development with supportive services for families.	96
Wilder Foundation - American House – affordable housing with support services.	53
Total of Permanent Supportive Housing.	2,429 bed capacity

Emergency Shelter Grant (ESG)

The City of Saint Paul annually administers the Stewart McKinney HUD Emergency Shelter Grant which funded emergency shelters for adults, families, and youth (Dorothy Day Extended Hours, Ain Dah Yung, Family Service Center, Project HOME), transitional Housing (Emma Norton, LSS Teen Safe House, Theresa Living Center, YWCA Transitional Housing), supportive housing (Project HOPE, Police Homeless Outreach Project) and support services (Twin City Community Voice Mail, Listening House)

Overall, ESG provides partial funding for many of the Continuum of Care facilities. Additionally, ESG-financed housing programs partners with Saint Paul social service agencies to assist approximately 7,085 sheltered and unsheltered homeless individuals during a fiscal year.

Homelessness Prevention and Rapid Re-Housing (HPRP)

Under the American Recovery and Reinvestment Act, Saint Paul is administering the Homelessness Prevention and Rapid Re-Housing Program (HPRP) for families, single adults and unaccompanied youth living in Saint Paul who are homeless or at-risk of being homeless. Saint Paul is partnering with Ramsey County to create a more comprehensive homelessness prevention delivery service, including leveraging HPRP funds with state homelessness prevention funds (FHPAP) to serve more residents-in-need. In 2009, Saint Paul sought innovative proposals for a broad-based network of homelessness prevention initiatives to successfully prevent people at risk from becoming homeless, and rapid re-house emergency shelter users to more housing. HPRP targets low-income households who are most in need of temporary assistance and most likely will secure stable housing after HPRP concludes. Eligible HPRP activities may include: rental assistance, housing relocation services, housing stabilization services, including case management, housing search, housing placement, and other support services for people at risk of being homeless or living in emergency shelters, drop-in centers, and on the streets; family reunification for homeless unaccompanied youth under age of 22; assisting New American refugees, and assisting homeless veterans. In addition to other HPRP activities, Saint Paul's priorities include: assist low income renters in foreclosed building; legal services to assist tenants retain housing; and additional County Emergency Assistance staff so HPRP participants can better access Emergency Assistance funds.

Continuum of Care

Ramsey County Community Human Service is the lead agency for the Continuum of Care for which the City of Saint Paul is a working partner. The Ramsey County Continuum of Care is a county-wide coordinated approach to end homelessness. Ramsey County Continuum of Care's Steering Committee recommends and directs the overall development of the Continuum of Care. The Committee's membership includes housing providers, support service provides, advocates, Ramsey County staff, City staff, and homeless residents. To further facilitate the Continuum of Care efforts, the City of Saint Paul provides staffing and support for numerous Advisory Boards and ad-hoc coalitions that focus on homelessness prevention programs, such as the following:

- Ramsey County Family Homelessness Prevention and Assistance Program (FHPAP) - a monthly coordination meeting of service providers, private citizens, County staff, and City staff who review programs, proposals and financing needs of emergency shelters, transitional housing, and supportive housing in Ramsey County.
- The St. Paul Area Coalition for the Homeless - a monthly coordination meeting of homelessness service providers.
- Heading Home Ramsey - Saint Paul/Ramsey County Homeless Advisory Board (Advocacy and, Communication with St. Paul City Council & Ramsey County Board)
- Project Homeless Connect - Saint Paul/Ramsey County sponsored event to coordinate homelessness prevention services with homeless residents.
- Homelessness Prevention and Rapid Rehousing – Housing Crisis Response Collaborative - The City is collaborating with FHPAP to develop a comprehensive homelessness prevention and rapid re-housing program for homeless residents living in an emergency shelter and residents at risk of being homeless.

Continuum of Care Accomplishments

Over the past years, Ramsey County Continuum of Care ("CoC") has made substantive progress to end homelessness as it continues to develop more community involvement in this effort. Recent achievements include:

- The publication of Hearth Connection's *Supportive Housing and Managed Care Pilot* – a qualitative data report that confirms the severity of the barriers faced by people experiencing long-term homelessness and documents costs when residents remain homeless and receive services in high crisis or institution. Hearth Connection, a Ramsey County CoC member, coordinated pilot teams to evaluate services for homeless single adults and families in Ramsey County and Blue Earth County. Pilot team included Wilder Foundation, Mental Health Resources, and Guild Incorporated. Researchers confirmed that supportive housing gets results for people who have been homeless as well as get results for government and the taxpayer.[61]

- Ramsey County CoC is an active member of *Heading Home Ramsey*, which is an ambitious state plan to end long-term homelessness in Ramsey County. The Ramsey County CoC members are working to create systemic changes in the delivery of homelessness prevention services in Ramsey County. Additionally, in conjunction with City of Saint Paul and Minnesota Housing, approximately 739 housing units serving long-term homeless residents have been financed since 2006.

[61] Hearth Connection's Supportive Housing and Managed Care Pilot, www.hearthconnection.org/results.

- In 2009, the City of Saint Paul received funds under the American Reinvestment and Recovery Act ("ARRA") to provide comprehensive homelessness prevention and rapid re-housing services. Members of Ramsey Count CoC provided program recommendations that were instrumental in developing the City's Homelessness Prevention and Rapid Re-Housing Program.

- In spite of record budget deficits and social service cuts, the County's CoC successfully received full funding for Family Homeless Prevention and Assistance Program in current biennium.

- Ramsey County Continuum of Care provided volunteer interviewers making the 2006 statewide homeless survey the more informative.

- With its multi-year involvement with a homeless management information system (HMIS) system, Ramsey County CoC was selected as a pilot for the new statewide HMIS system.

- With support and encouragement from the Continuum of Care, transitional housing providers meet regularly to coordinate and unify their intake process to facilitate rapid access of transitional housing by homeless individuals and families.

- CoC successfully obtained funding from the City of Saint Paul and Ramsey County for more emergency shelter beds during winter 2009-2010.

The State of Minnesota uses the CoC planning process to improve the way the State sets policy and awards funding to support local governments and organizations responding to homelessness. The State of Minnesota has been proactively in creating a Plan to End Long-Term Homelessness, and Ramsey County Continuum of Care members have been actively participants in *Heading Home Ramsey*, a Plan to End Homelessness in Ramsey County.

Finally, the Ramsey County Continuum of Care recognizes that the lack of affordable housing is a major barrier for families and individuals who are chronically homeless, homeless, or at-risk of being homeless families. In response, the City of Saint Paul's Housing 5000 Program created 1,171 new housing units affordable at less than 50 percent of area median income, including at least 234 supportive housing units during 2000-2005. Moreover, since 2006, the City continues to support affordable housing opportunities including the development of 739 housing units for long-term homeless residents.[62]

Services provided to Prevent Homelessness

The Family Homeless Prevention and Assistance Program (FHPAP), administered by the MN Housing Finance Agency, and jointly funded by the State of Minnesota and Ramsey County, provides homelessness prevention programs to families and single adults. In 2003, the Ramsey County FHPAP provided services, cash assistance and crisis intervention that prevented homelessness for 342 households with a total of 892 people. Other resources and programs in Ramsey County that prevent homelessness in Ramsey County include the following:

[62] A total of 739 housing opportunities are expected to be financed by the end of 2009. Sixty-eight additional units will be financed in 2009 with use of federal tax credit monies to both MN Housing and Saint Paul PED. *Heading Home Ramsey Report*, Key Accomplishments for 2009.

Fig. 42. Homelessness Prevention Activities – Short Term Assistance

Homelessness Prevention - Short Term Financial Assistance for rent, utility payments or other emergencies which threaten the loss of housing	
Program	**Provider**
Homelessness Prevention and Rapid Re-Housing (HPRP) Emergency Assistance (EA) Emergency General Assistance County Diversionary Program	City's HRPP funded by federal stimulus funds Ramsey County Community Human Services
Community Funds	Saint Paul Foundation – Community Sharing
Emergency Assistance & Utility Repair Payments	City of Saint Paul – Sewer Abatement Fund CAP-Energy Payments, CAP-Weatherization, House Calls, Ramsey County EA, Salvation Army Heat Share
Financial Assistance to prevent evictions and foreclosures	City's Homelessness Prevention and Rapid Re-Housing (HPRP), City's Mortgage Foreclosure Prevention Program, House Calls, Community Stabilization, Community Sharing Fund, Ramsey County EA

Fig. 43. Homelessness Prevention Activities – Secure and Maintain housing

Landlord/Tenant Advocacy, Training, Counseling and Services that assist households secure and maintain stable safe and decent housing.	
Program	Providers
Tenant and Landlord Advocacy Programs	Community Stabilization Project, Saint Paul Association of Responsible Landlords, and Southern Minnesota Regional Legal Services (SMRLS) – Project HOPE
Loan/Grant Programs to make necessary repairs to prevent condemnations	City's Home Loan Fund, City's Sewer Repair Abatement Program, Community Stabilization Project - Tenants' Remedies Act, and House Calls.
Mediation Services	Dispute Resolution Center
Legal Services - representing low income tenants	SMRLS (general program services, Housing Law Equality Project - legal representation for discriminatory claims, and Project Hope)
Communication Services - providing greater access to housing information and employment	Twin City Community Voice Mail, United Way's 211 - First Call for Help, and Housing Link

Fig. 44. Homelessness Prevention Activities – Basic Needs

Services that address basic needs of homeless and at-risk of being homeless residents	
Program	Provider
Food Shelf and Meals Programs	26 St. Paul Food Bank sites with significant funding from United Way, CAP- Fair Share Program, free meals at Dorothy Day Center, Neighborhood House, and faith communities
Primary Health Care	West Side Clinic and City/County Public Health have federally-funded health service programs for homeless individuals, including health screenings at City's emergency shelters. Community clinics include American-Indian Health Center, Family Tree, Model Cities Health Center, North End Health Center, and West Side Health Center. AIDS and STD testing and treatments are available at Face to Face Clinic, MN AIDS Project, Model Cities Health Center, and Ramsey County Public Health Division.
Clothing	Free/low-cost clothing is available at Listening House, St. Joseph's Coat, and St. Vincent's.
Furniture	Goodwill, St. Vincent's and Disabled Americans
Showers	Showers are available at Union Gospel Mission and Dorothy Day Center.
Counseling Services	Catholic Charities, Lutheran Social Services, Crisis Hotline, Regions Medical, Neighborhood House, Face to Face Center, and Ramsey County Mental Health
Job and Employment Training	Through joint agreement with City of Saint Paul, Ramsey County operates job training programs funded with state and federal funds. The City operates a summer youth job program.

§91.210(d) Special Needs Facilities and Services

Housing Opportunities and Housing Support Services for Elderly and Frail Elderly Persons

In Saint Paul, older residents have several different housing options, such as:

- **Independent Living**. Many elderly residents live independently in homes, condominiums, apartments, or government-assisted housing developments. In fact, approximately 15,570 older Saint Paul residents own their own home, and 6,800 older Saint Paul residents are renters.[63]

- **Home Ownership - Home Maintenance**. The Saint Paul's Home Loan Fund offers several low interest home improvement loan programs and a Citywide deferred rehabilitation loan program that assist many elderly homeowners whose homes need substantial repairs, energy conservation, routine maintenance repairs, and/or accessibility modifications.

- **Home Ownership - Mortgage Counseling**. The City's Mortgage Foreclosure Prevention Program provides mortgage default counseling services, including explaining reverse mortgages that are available to elderly homeowners.

- **City-financed - Home Ownership Programs**. The City's Housing 5000 increased senior housing by financing Real Life Cooperatives (59 senior housing cooperatives), Arundel Condominiums (26 senior condominiums), and Travel Lodge Condominiums (48 affordable ownership units) as well as other private market housing.

- **Affordable Rental Housing**. In Saint Paul, many subsidized rental housing buildings serve low-income senior residents, including 16 Public Housing High-rise buildings (2,548 apartments for seniors, people with disabilities, and singles). Still, the 2009 CHAS dataset reports that 55 percent of elderly residents with incomes less than 50 percent of AMI have a disproportionate need for safe affordable housing.[64]

- **City-financed - Affordable Rental Housing**. During 2002-2006, the City financed additional units of independent-living senior-oriented rental housing, such as Osceola Park (88 units), Arbor Pointe (47 units), Seabury Apartments (50 units), and Lyons Court (60 units) of which at least 20 percent of these units are affordable for senior residents with incomes less than 50 percent of the area median income. The City also financed Bridgecreek Apartments (160 affordable senior units) and the Payne/Phalen Boulevard Mainstreet Senior Project (73 affordable senior housing units). The City is now providing financing for Frogtown Square (50 affordable senior housing units), currently under construction.

- **Congregate Facilities and Assisted Living Facilities**. The City of Saint Paul has both private-market and affordable congregate living facilities which offer meals, transportation, and other services. The City has service-enriched subsidized housing, such as Central Towers, Redeemer Arms (150 apartments), and the Saint Paul Public Housing Agency offers congregate dining (lunch) at ten public senior housing hi-rises under Title III Senior Nutrition Program. Wilder Foundation also currently owns and operates the Humboldt Apartments, which provide 120 HUD-subsidized apartments and

[63] CHAS 2009 dataset, Table 6.
[64] CHAS 2009 dataset, Table 10.

82 affordable fixed-rate apartments which provide affordable, service-enriched housing for older adults and younger disabled persons in Saint Paul.

Additionally, the City of Saint Paul has assisted-living facilities that provide housing with more intense supportive services, such as personal care, medication reminders, transportation and 24-hour non-nursing care, such as the following:

- **Saint Paul Public Housing Agency – Congregate Housing Services.** The PHA's Assisted Living Program (also called Congregate Housing Services Program) provides case coordination, housekeeping, daily meals and monitoring, plus other needed services at six PHA hi-rises to assist frail or disabled residents who are at risk of nursing home placement. Residents contribute toward the service costs by paying a percentage of their income (between 10 and 20 percent); HUD and matching local resources cover the remaining program costs. Two daily meals are served 365 days per year, one in conjunction with the Ramsey Action Programs Senior Dining Program. Saint Paul Public Housing Agency operates the Congregate Housing Service Program at Mount Airy, Valley, Ravoux, Edgerton, Montreal, and Iowa Hi-rises.

- **Saint Paul Housing Agency - Wilder Assisted Living Program**. The Wilder Assisted Living Program provides comprehensive supportive services to assist frail or disabled residents at risk of nursing home placement at four Public Housing Agency hi-rises: Ravoux, Dunedin, Hamline, and Edgerton. Basic services include three daily meals, 24-hour on-site staff that provides housekeeping, laundry, personal care services, medication monitoring and a day activity program. The Wilder Assisted Living Program was created through collaboration among PHA, Wilder and Ramsey County. It is licensed through the state under the Home Care Rule. Community resources augment base services to meet specific residents' needs. Payment is made through direct client reimbursement, Alternative Care, Elderly Waiver funds and/or Minnesota Supplemental Assistance funds.

- **City of Saint Paul financing Assisted Living Facilities**. Since 2002, the City of Saint Paul has increased the supply of assisted living facilities by financing Arlington Gardens (50 units of affordable housing with supportive services for seniors and persons with limited mobility), Marion Center (127 units of congregate care and assisted living), Gateway Village (121 units of assisted living facility), and Riverview Highland Apartments (54 units of congregate care and assisted living). Moreover, these multi-housing facilities were designed to comply with ADA guidelines.

- **Nursing homes**. The City has numerous nursing homes that provide 24-hour skilled nursing services. Additionally, the City has several facilities, such as Lynbloomsten and Episcopal Homes (126 units of nursing care) that offer a continuum of care including independently living, assisted living with personal care support systems, and nursing homes with more intense medical care.

Housing Opportunities and Housing Support Services for Persons with Developmental Disabilities

According to the federal government, a developmental disability is a severe, chronic disability that is attributable to mental or physical impairments that are manifested before the individual attains age 22 and likely to continue indefinitely.[65] Developmental disabilities are substantial functional limitations in several major life activities, such as self care, receptive and expressive language, learning, mobility, self direction, capacity of independent living, and economic self-sufficiency. In Minnesota, there are a wide

[65] Developmental Disabilities Assistance and Bill of Rights Act Amendment of 1996.

variety of housing options for persons with developmental disabilities- ranging from highly structured, institutionalized care to living in the community with various supportive services coordinated by Ramsey County Community Human Services. In the City of Saint Paul, there are housing opportunities and supportive housing programs for individuals with development disabilities, such as:

- **Independent Living**. Many individuals with development disabilities can live independently in homes, private-market apartments, and subsidized housing if support services are provided. *However, it is important to recognize that residents with development disabilities often receive support from family caregivers, who are aging and less able to care for their family member with development disabilities. At the same time, limitations are being placed on the number of group homes for residents with development disabilities. In 2005, there were 180 licensed Rule 34 beds for residents with development disabilities. In 2010, there are 112 licensed Rule 34 beds. Consequently, more housing alternatives for residents with developmental disabilities will be needed in the next ten – fifteen years.*

- **Home Ownership - Home Maintenance.** Saint Paul's Home Loan Fund assists homeowners with development disabilities whose homes need substantial repairs, energy conservation, routine maintenance repairs, and/or accessibility modifications by offering low interest home improvement loan programs and a Citywide deferred rehabilitation loan program.

- **Home Ownership- Mortgage Foreclosure Prevention Counseling**. Periodically, the City's Mortgage Foreclosure Prevention Program provides mortgage default counseling services to homeowners with developmental disabilities.

- **Saint Paul Public Housing Agency - Assisted Living Programs.** The PHA's Assisted Living Program (Congregate Housing Services Program) provides case coordination, housekeeping, daily meals and other needed services at six PHA hi-rises to assist disabled residents who are at risk of nursing home placement. Residents partially pay for service costs, and remaining program costs are funded by HUD and matching local resources.

- **Saint Paul Public Housing Agency- Wilder Assisted Living Program**. The Wilder Assisted Living Program provides comprehensive supportive services to assist disabled residents at risk of nursing home placement at four Public Housing Agency hi-rises. Basic services include three daily meals, 24-hour on-site staff that provides housekeeping, laundry, personal care services, medication monitoring and a day activity program. The Wilder Assisted Living Program is licensed through the state under the Home Care Rule. Community resources augment base services to meet specific residents' needs. Payment is made through direct client reimbursement, Alternative Care, Elderly Waiver funds and/or Minnesota Supplemental Assistance funds.

- **Congregate Living Facilities and Assisted Living Facilities.** The City of Saint Paul has both private-market and affordable congregate living facilities which offers meals, transportation, and other support servicers. For example, Redeemer Arms (150 apartments) offer service-enriched affordable housing for residents with mental illness or residents with developmental disabilities. Wilder Apartments on Snelling offers 30 units of affordable permanent single room occupancy (SRO) for single adults, including single adults with developmental disabilities.

- **City financing of Single Room Occupancy facilities**. The City assisted the renovation of American House (60 SRO units) and St. Christopher's Place (70 SR0 units) which provides housing with support

services for single adults. This housing may be appropriate for high-functioning individuals with developmental disabilities.

- **HUD Section 811 Program**. Saint Paul's Elders Lodge assists 43 rental housing units with supportive services for very-low income senior residents and individual adults with physical or developmental disabilities so they can live more independently.

- **New Beginnings-Brain Injury Program.** Saint Paul Public Housing Agency has 28 apartments in Montreal and Neil High-rises in which Accessible Space Inc. provides 24-hour personal care attendant service and support services for residents who sustained brain injuries. This supportive housing includes apartment management, social skills, vocational involvement and a broad array of independent living skills. Residents live in their own apartments and work toward greater independence with the help of a site supervisor and resident assistants.

- **Minnesota Department of Human Services – Rule 34 – residential facilities**. This housing serves persons with developmental disabilities:

Fig. 45. Residential Facilities for Persons with Developmental Disabilities

Name of Facility	**Bed Capacity**
REM Wheeler	6
REM Ramsey	15
Tivah House	6
Jacob Residence	6
Our House of Minnesota	6
LSS Residence III	6
REM Mississippi	6
Edmund House	6
Frances Residence 1	6
Chez Nous	6
New Directions	6
Dungarvin	6
Lutheran Social Services Residence III	6
Fairmount Home	6
REM Goodrich	6
Dungarvin II – Balbriggen	5
Total Facilities	**112**

- **Nursing Facilities**. Nursing Facilities are long-term health care facilities providing in-patient care and nursing services, restoration and rehabilitative care and assistance meeting daily living needs of individuals with developmental disabilities.

- **Case Management Services**. Currently, Ramsey County Community Human Services provides case management services to approximately 1,186 Saint Paul residents with developmental disabilities of which approximately 300 residents are ages 14 years or younger; 131 residents are 14-21 years old; 392 residents are ages 22-39 years old; and 363 residents are 40 years and older.

- **State of Minnesota Waivered Services Program**. State of Minnesota Waivered Services Program makes Medicaid waivers available for medical services in non-institutional environments. Although Medicaid waivers do not pay housing costs, waivers can be used for environmental modifications and housing placement assistance. In addition, Medicaid is used to support nursing home care and expenses of other institutional environments for persons with developmental disabilities.

- **ARC Minnesota**. ARC Minnesota provides services to persons with developmental disabilities seeking housing placement assistance, such as finding apartments or being placed in group homes, and assist individuals with developmental disabilities purchase their own homes. ARC Minnesota's Housing Access Coordination Program is an approved service within the MR/RC Waiver. Additionally, ARC Minnesota actively urges landlords to accept tenants with developmental disabilities.

Housing Opportunities and Support Services for Persons with HIV/AIDS

According to the State of Minnesota Health Department, there are 860 residents living with HIV/AIDS in Saint Paul. In the past, the Minnesota Aids Project estimated that 65 percent of the persons living with HIV/AID own their own home or rent apartments. Therefore, it can be extrapolated that 239 Saint Paul residents living with HIV/AIDS are precariously-housed.

Housing Opportunities for Persons with AIDS Program (HOPWA) provides HUD funds to assist low income persons living with HIV/AIDS and their families. HOPWA provides emergency housing assistance, rental assistance, and support services so that persons with HIV can live in safe and decent housing. Minnesota Housing administers HOPWA for the eligible seven-county metropolitan area. While City of Saint Paul does not directly receive or administer HOPWA funds, the City of Saint Paul does have some HOPWA-financed housing and housing supportive services as follows:

- **Hearth Connection.** Hearth Connection is a supportive scattered-site housing program in Ramsey County and Blue Earth County that assists single adults and families who have a history with chronic homelessness and diagnosed with severe mental illness, chemical dependency and/or HIV. With partial HOPWA funding, Hearth Connection has 20 supportive housing units.

- **City financed housing developments with HOPWA units.** The City financed the renovation of Saint Christopher's Place which provides 70 permanent affordable supportive housing units with 5 HOPWA units for single adults. Additionally, the City partnered with MHFA to finance the Saint Paul Urban League's Martin Luther King Court which has eight apartments for homeless families with one member who is HIV+.

- **Assisted Living Facility.** Clare House is an assisted-living facility for four residents with 24-hour care, including medication administration.

- **Case Management.** Case managers assist people living with HIV to assess ongoing needs, develop a plan to meet these needs and connect people to community resources. In order to optimize a client's ability to manage HIV, case managers assist in coordination of health care, provide education about HIV and advocate to meet peoples' basic living needs. Case managers also access needed resources such as support groups, chemical dependency treatment facilities, legal assistance, vocational rehabilitation services and mental health resources Case management services are provided for HIV-positive people in the Twin Cities metro area.

Housing Opportunities and Housing Support Services for Persons with Physical Disabilities

The Americans with Disabilities Act of 1990 (ADA) defines disability as a "physical or mental impairment that substantially limits one or more of the major life activities." The U.S. Census defines persons with a disability as persons who have difficulty performing one or more activities of daily living (seeing, hearing, speaking, lifting, carrying, using stairs, and walking).[66] Persons with severe disabilities often are unable to perform one or more activities, use an assistive device to get around, or need assistance from another person to perform basic activities. As noted, the definitions of disabilities have changed over the last decade. In addition to the traditionally-acknowledged disabilities, new definitions emphasize functional status which includes many non-apparent disabilities caused by chronic health conditions, such as arthritis, heart disease, and back problems.

Given the wide range of housing needs of individuals with disabilities, it is difficult to assess the total housing resources available to them. Many programs (including CDBG and HOME) are available to persons with physical disabilities. In the City of Saint Paul, there are a wide variety of housing options for persons with physical disabilities - ranging from independent living and housing with support services, such as:

- **Independent Living.** Many physically-disabled individuals can live independently in homes, private-market apartments, subsidized rental housing or with family members. Physically-challenged residents use support services, if necessary.

- **Home Ownership - Home Maintenance**. The City of Saint Paul's Home Loan Fund assists individual homeowners with physical disabilities whose homes need substantial repairs, energy conservation, routine maintenance repairs, and/or accessibility modifications. The City of Saint Paul Home Loan Fund offers several low interest home improvement loan programs and a citywide deferred rehabilitation loan program.

- **Home Ownership - Mortgage Counseling**. Periodically, the City's Home Loan Fund's Mortgage Foreclosure Prevention Program has provided mortgage default counseling services to homeowners with physical disabilities. It should be noted that most foreclosures occur due to loss of stable income regardless of one's physical abilities.

[66] U.S. Census: Survey of Income and Program Participation (SIPP).

- **Affordable Rental Housing**. In Saint Paul, many subsidized rental housing buildings serve low-income senior residents, including 16 Public Housing hi-rise buildings (2,548 apartments for seniors, people with disabilities, and singles). Additionally, Saint Paul Barrier-Free Apartments (36 units) and Lewis Park Apartments (103 units) provides accessible units. Nonetheless, all recently-built multi-unit buildings must offer some accessible units in compliance with ADA.

- **City-financed Affordable Rental Housing**. Since 2002, the City has financed independent-living senior-oriented housing with accessible units, such as Osceola Park (88 units), Arbor Pointe (47 units), Seabury Apartments (50 units), and Lyons Court (60 units). Under Housing 5000, at least 20 percent of these units were affordable for senior residents with incomes less than 50 percent of the AMI. The City also financed Bridgecreek Apartments (160 affordable senior units) and the Phalen Mainstreet Senior Project (73 affordable senior housing units).

- **Saint Paul Public Housing Agency's Assisted Living Programs**. The PHA's Assisted Living Program assist frail or disabled residents at risk of nursing home placement by coordinating support services at Mount Airy, Valley, Ravoux, Edgerton, Montreal and Iowa Hi-rises.

- **Saint Paul Public Housing Agency - Wilder Assisted Living Program**. The Wilder Assisted Living Program provides comprehensive supportive services to assist frail or disabled residents at risk of nursing home placement at four buildings. Basic services include three daily meals, 24-hour staff that provide housekeeping, laundry, personal care services, medication monitoring and a day activity program. The Wilder Assisted Living is state-licensed under the Home Care Rule. Payment is made by client reimbursement, Alternative Care, Elderly Waiver funds and/or Minnesota Supplemental Assistance.

- **Congregate Living Facilities and Assisted Living Facilities**. The City has both private-market and affordable congregate living facilities which offer meals, transportation, and other services. , Saint Paul has service-enriched affordable housing, such as Central Towers (172 units) and Redeemer Arms (150 apartments). Wilder Foundation's Humboldt Apartments provides 120 HUD-subsidized apartments and 82 affordable apartments that offer service-enriched housing for older adults and younger disabled persons in Saint Paul.

- **HUD Section 811 Program**. Saint Paul's Elders Lodge assists 43 rental housing units with supportive services for very-low income senior residents and individual adults with physical or development disabilities so they can live more independently.

- **Accessible Space, Inc**. Saint Paul Public Housing Agency has eight apartments in which Accessible Space Inc. provides 24-hour personal care attendant service and support services for residents with mobility impairments and/or complications from diabetes. Additionally, Accessible Space, Inc. manages Henry Courts II (10 units) for persons who require accessibility but arrange their own supportive living services. These townhouses have universal design features, such as private entrances, lowered kitchen counters and light switches, and lowered windows. Accessible Space, Inc.'s Cooperative Homes also provide a total of twelve private bedrooms and 24-hour access to service staff. At two locations, these six-bedroom houses are accessible-designed with supportive environments for individuals who use ventilators.

- **Nursing Facilities**. Nursing Facilities are long-term care facilities providing nursing services, rehabilitative care and assistance meeting daily living needs of individuals with physical disabilities.

- **State of Minnesota Waivered Services Program.** State of Minnesota Waivered Services Program makes Medicaid waivers available for medical services in non-institutional environments. Although Medicaid waivers cannot pay housing costs, waivers can be used for environmental modifications and housing placement assistance. In addition, Medicaid is used to support nursing home care and expenses of other institutional environments for persons with development disabilities.

- **List of Accessible Housing**. As a member of the Fair Housing Implementation Council, the City of Saint Paul financially supported a fair housing strategy to fund Housing Link's Housing Referral Services to develop a list of accessible housing in the metropolitan area.

Housing Opportunities and Housing Support Services for Persons with Chemical Dependency

After receiving treatment, persons with chemical dependency often need affordable housing or supportive housing so that they can avoid further relapses. Correspondingly, the City has housing options that accommodate the needs of chemical dependent persons, such as:

- **Independent Living.** Depending upon the degree of chemical dependency, private market housing is available.

- **Transitional Housing Facilities, Rule 35 Licensed-Facilities, and Sober Homes.** According to Ramsey County Community Services, there is a need for chemically-free transitional housing that is affordable for individuals coming out of treatment. Most often, these individuals need board and lodging facilities while they earn income to live independently. In Saint Paul, transitional housing facilities and Rule 35 facilities offer at least 718 spaces for residents who must be chemically-dependent free. Additionally, forty-four Saint Paul housing sites that provide "clean and sober" housing for 406 residents.

- **Case Management Services**. Ramsey County Community Human Services coordinates case management services to chemically-dependent persons as needed.

Housing Opportunities and Support Services for Persons with Mental Illness

Ramsey County Community Human Services provides supportive services to individuals with mental illness. For residents leaving mental health treatment facilities, there are approximately 400 housing subsidies being administered by the County with its partners, including South Metro Human Services, Mental Health Resources, and Guild, Inc. Ramsey County Continuum of Care works closely with County staff, State Department of Human Services, the ACCESS team, and the newly-formed Housing Crisis Response Program (funded by Homelessness Prevention and Rapid ReHousing funds under the American Recovery and Reinvestment Act) to ensure that there are housing solutions before a resident is discharged from a mental-health treatment facility. Additionally, the County manages an entire floor at Mary Hall to provide intensive case management services for people with serious mental illness and the County administers the state-funded Group Residential Housing Program.

Still, many individuals with mental illness can live independently when receiving support services.

Additionally, the City of Saint Paul has various housing opportunities for individuals with mental illness, such as:

- **Independent Living**. According to the Minnesota Department of Human Services, seven out of ten persons with mental illness live independently, especially if individual supportive services are provided. As an example, Redeemer Arms (150 apartments) provides independent living for seniors and persons with disabilities, including mental illness. Wilder Apartments at Snelling (30 SRO units), American House (53 SRO units), and St. Christopher's Place (70 units) provide affordable permanent supportive housing for single persons, including individuals with mental illness.

- **Extended Care**. Extended Care facilities provide housing for individuals with mental illness who had multiple Rule 36 placements and need supportive services. Extended Care facilities enable clients to live independently in their own apartment while receiving supportive services and illness management support from the Rule 36. The level of service the individual receives under Rule 36 is based on each client's individual desires and needs.

- **Shared Housing**. An individual with mental illness may live in shared housing with three to four individuals who are also diagnosed with a serious and persistent mental illness. With this permanent housing arrangement, individuals receive case management services and home-based support services, such as relationship management and household maintenance.

- **Assisted Living /Assisted Living Plus**. With assisted living services, individuals with mental illness can live in their home, apartment, or group setting with the availability of 24-hour supervision. The assisted living staff provides supportive services (socialization, scheduling appointments, managing personal funds, arranging or providing transportation); home care services (preparing modified diets, medication reminders, perform household chores during acute illness, assist with dressing and hygiene) while also helping with home management tasks (housekeeping, laundry, shopping, preparation of snacks and meals).

- **Adult Corporate Foster Care**. Adult Corporate Foster Care provides services to individuals who need highly-intensive support services to maintain residence in the community. Services may include 24-hour individual care, including personal care and services, homemaker, chore, attendant care, behavioral interventions, companion services, and medication oversight.

- **Family Foster Care**. In a family foster care setting, individuals live with community members in their homes. Also, individuals living at home receive low level support and assistance with some activities of daily living.

- **Board and Care**. Board and Care facilities allow individuals to live communally, which includes receiving meals and support services from on site staff.

- **Residential Facilities**. In Saint Paul, under Rule 36, Minnesota Department of Human Services licenses residential facilities for persons with mental illness serving 102 residents.

- **Transitional Housing.** The City of Saint Paul has transitional housing facilities that also serve persons with mental illness including:

- *Emma Norton Residence* provides (42 units) transitional housing for single women who are homeless or at risk of being homeless due to chemical dependency, mental health challenges or domestic abuse. Emma Norton is partially funded by the City's Emergency Shelter Grant.

- *The ROOF Project* is a transitional housing project that helps 63 homeless families obtain affordable housing. ROOF provides supportive services and works with landlords to secure access to well-maintained affordable housing for participating families with multiple barriers, including challenges with mental illness.

- *Project Quest* provides similar services as the ROOF Project to 38 households but Project Quest provides supportive services to "hard-to-serve" individuals and families who have multiple barriers, including serious mental illness.

- **City-financed Supportive Housing**. Since 2002, the City has financed 236 supportive housing units to serve diverse communities. As an example, Jackson Street Village provides permanent housing and supportive services to 24 previously homeless or precariously-housed families who also face chemical abuse and/or mental health issues. Jackson Street Village offers supportive services so that families learn the skills necessary to maintain permanent housing and avoid homelessness.

- **Support Services for Persons with Mental Illness**. Ramsey County Community Human Services and other community groups provide services for persons with mental illness. In particular, People Inc, Streetworks, and ACCESS staff seek out homeless people with mental illness on the streets, in camps, in cars and under bridges. These street workers often accompany the homeless person to the first mental health appointment and provide follow-up to determine if medications are being used properly.

- **Health Care for the Homeless**. In addition to providing psychiatric services through the Dorothy Day Center, Heath Care for the Homeless provides a mental health nurse who visits outreach sites in the community, conducts Emotional Wellness Groups at Women's Advocates Battered Women Shelter and consults with shelter staff on mental health issues as they arise.

- **Bridges.** A statewide program operated in 43 counties, Bridges provides temporary rental assistance payments and security deposits paid directly to property owners on behalf of participants with serious and persistent mental illnesses who are on a waiting list for a permanent rent subsidy. Other eligible uses include utility deposits, contract rent for up to 90 days during a medical or psychiatric crisis, and payments to utility companies for up to 90 days during medical or psychiatric hospitalization.

- **Crisis Housing Assistance.** The Minnesota Department of Human Services provides a flexible pool of money to provide short-term housing assistance to persons receiving in-patient psychiatric care. Persons must have a serious and persistent mental illness requiring less than 90 days of assistance and be able to retain their current housing.

Supportive Services for Refugees and Persons with Limited English Speaking Proficiency

- **Affordable Housing.** For newly-arrived refugees, stable affordable housing is a major concern. While Saint Paul has taken great strides to meet the medical, clothing, and educational needs, refugees still must secure affordable housing that is adequate for their family size. However, even

with Minnesota Family Investment Program (MFIP) assistance, refugees lack sufficient income to pay housing costs while simultaneously learning a new language, new culture, and marketable job skills. In response, the City of Saint Paul and its partners currently serve over 16,000 households with affordable housing benefits. In further recognition of affordable housing needs, the City continues to finance new housing units - affordable to households at 60 percent or less of AMI.

- **Homelessness Prevention and Rapid Re-Housing ("HPRP")** *(funded under the American Recovery and Reinvestment Act of 2008).* With HPRP funding, Vietnamese Social Services is providing multi-lingual homelessness prevention services to the Vietnamese community and Karen refugees. Additionally, Minnesota Council of Churches is working with Hmong American Partnership to provide multi-lingual homelessness prevention services to assist Hmong refugees and Karen refugees.

- **Housing Services.** The **Regional Analysis of Impediments to Fair Housing** identified that Limited English Proficient (LEP) populations are often unable to access housing information in their primary languages, which correspondingly limits their fair housing choice. In Saint Paul, the City recognizes that many new residents recently migrated from Russia, Somalia, Ethiopia, and Southeast Asia with limited English-speaking skills. In response, the Saint Paul Planning and Economic Development Department developed a Limited English Proficiency Plan which identifies primary language groups (listed in size order) as Hmong, Spanish, Somali, Serbo-Croatian, Vietnamese, and Oromo.[67] The City also can access other language translators as necessary. The City's multilingual staff provides information about the following programs:

- **The City of Saint Paul Lending Program.** The City's Home Loan Fund's multilingual staff provides home financing information (home buying and home improvements) in Spanish and Hmong. Additionally, the City provides language translation services, as needed.

- **Mortgage Foreclosure Prevention Program Counseling**. The City provides default counseling in Spanish and Hmong languages as well as access language translating services, as needed. The City also works with community agencies, such as Lao Family Services, to provide culturally-sensitive default counseling services.

- **Homebuyer Classes***.* The City financially supports the Home Ownership Center's (HOC) multilingual home buying education classes in English, Spanish, Hmong, Russian, and Khmer. Additionally, HOC is working with the Somali community to develop culturally-sensitive home buying strategies for the Somali community.

- **Relocation Counseling***.* The City has provided multi-lingual relocation assistance, as needed.[68]

- **Department of Neighborhood Housing and Property Improvement (Code Enforcement)**. Correction Notices issued by the Code Enforcement Department now have a reference line for translation service in Spanish and Hmong. Language translations are available for Code Enforcement Legislative Hearings as well as to explain the City's Special Assessments.

---

[67] Saint Paul Department of Planning and Economic Development – Limited English Proficiency Plan.
[68] The City of Saint Paul maintains a list of multilingual employees who can respond to immediate requests for City-related services.

- **Building Code**. The City's Building Code Department now provides Spanish-speaking translation services to give building code instructions to homeowners wishing to do improvements.

§91.210(e) Barriers to Affordable Housing

With a long history of financing affordable housing, the City has approximately 16,460 households (36 percent of all City renters) who currently receive some housing assistance, including 12,228 publicly-assisted housing units and 4,232 Section 8 vouchers. However, barriers to accessing, providing, and maintaining affordable housing remain.

The biggest barrier to securing affordable housing is that many households lack sufficient incomes to pay housing costs, due to the lack of living-wage job opportunities. Moreover, households with stable incomes, such as Minnesota Family Investment Program (MFIP) assistance and Social Security, often must seek government-subsidized housing because these households cannot afford to pay the rents of modestly-priced apartments in the private market. On the other hand, many residents are denied affordable housing because they have poor credit, bad tenancy history, and personal issues. This has been exacerbated by the ongoing recession, as foreclosures negatively affect credit ratings of households, leading to trouble in accessing rental options because potential landlords are concerned that such households will be unable to make rental payments.

Even with these seemingly insurmountable barriers, the City of Saint Paul's has aggressively produced affordable housing. Most important, during 2002-2005, the City's Housing 5000 program financed 1,771 new housing units affordable to 30 percent and 50 percent of the AMI, and an additional 276 units affordable to households at 60 percent of the AMI.[69] Nonetheless, barriers to affordable housing as identified by the City of Saint Paul include:

- **Service fees**. With federal and state budget constraints, the City must rely upon service fees to pay operational costs - especially when local municipalities must comply with unfunded federal and state mandates. In response, City of Saint Paul has worked to develop reasonable fees that are commensurate with municipal costs. However, there are no longer any fee reductions based on a project's affordability level. The fact remains that developing affordable housing is more costly in urban areas than green fields. Consequently, the City needs more federal and state support to preserve and build affordable housing.

- **Lack of land**. As a fully-built City, Saint Paul has less available land to build affordable housing such as single family Habitat for Humanity homes or larger housing developments. Additionally, the City has almost no available land in higher income neighborhoods, which further limits the City's ability to promote affordable housing across the city. Thus, land clearance costs pose additional costs for affordable housing developments.

- **Rental property tax rates**. In 2001, the Legislature enacted far-reaching property tax reform, reducing the disparity between rental and owner-occupied housing. The property tax rate for apartments was reduced from 2.4 percent to 1.8 percent for property taxes in 2002, with further reductions in rates to 1.25 percent by 2004.[70] In 2005, the State created the Low Income Rental

[69] Additionally, 303 units were financed during Housing 5000 affordable to households at 61-80% of the Area Median Income.
[70] Property tax rates for attached/detached homes valued up to $500,000 pay a 1.0 percent property tax rate; homes valued above that pay 1.25 percent.

Classification[71], which made significant changes to the property tax classification rate for qualifying low-income rental properties. For a rental property that is subsidized under a federal or state government program and at least 20 percent of the property's units have rents restricted at levels affordable to households at or below 60 percent of the metro area median income, the property tax rate for the affordable rental units is reduced from 1.25 percent to 0.75 percent. The rest of the market-rate units within such buildings are still taxed at the regular multifamily apartment class rate of 1.25 percent. Despite this progress, State legislative priorities can shift over time, and property tax reforms can still impose cost burdens on maintaining affordable housing.

- **Changes in the housing market.** The City faces constant pressures to promote citywide development while trying to preserve affordable housing. However, as neighborhoods improve, such as Downtown Saint Paul and potentially along the Central Corridor line, building owners often consider terminating government housing programs when possible. In the past, the City made great efforts to preserve federally-subsidized housing, such as Skyline Towers, Central Towers, and Torre de San Miguel. The City will continue to have difficulty in preserving affordable housing in the future when receiving less financial support from the federal and state governments.

- **Need for housing with accessible design.** While many multi-unit affordable housing developments are built to ADA compliance standards, many physically-challenged persons cannot easily access other housing in Saint Paul, such as affordable single family housing, duplexes, or townhouses. Consequently, the lack of accessible-designed housing becomes an additional affordable housing barrier for persons with physical challenges.

- **Fair housing.** Housing discrimination can be a significant barrier for individuals and families seeking affordable housing. While discrimination is often difficult to detect, discrimination against persons on the basis of race/ethnicity, familial status, language, gender, age, disability and receipt of public assistance can prevent access to safe and decent housing.

[71] See http://www.mnhousing.gov/housing/developers/MHFA_004851.aspx.

§91.215 Strategic Plan

§91.215(a) General

Saint Paul is an older, fully-developed City with infrastructure, housing, and commercial properties that are in constant need of repair or replacement. The process of prioritizing these improvements and allocating scarce resources is a difficult task. The City utilizes plans, policies, resident and organizational input to help make these decisions. This section of the Consolidated Plan discusses how the priorities identified in the plan were determined, including the identification of obstacles for meeting underserved needs. The priorities reflect the needs of the entire City, and are based on the assumption that all funding sources (including HUD funding) will not change significantly over the next five years.

The obstacles to meeting underserved housing and community development needs in Saint Paul are varied. These obstacles contribute to the lack of affordable housing opportunity and the community's inability to meet the needs of all of its residents. Some of the obstacles are as follows:

- Insufficient funding for housing activities from all levels of government
- The continued aging housing stock
- The continued household and neighborhood crises caused by the high number of mortgage foreclosures (including households with failed subprime and adjustable-rate mortgage products)
- The scarce availability and high cost of land for development and redevelopment
- High housing construction and operating costs
- High infrastructure maintenance costs and limited local budgets

Despite the millions of dollars of continued public and private investment, the housing needs in Saint Paul continue to grow. The need for safe, decent and affordable rental and ownership housing exists throughout the City. The majority of the City's housing efforts are based on a variety of market and public sector factors including the availability of various financing sources, the condition and vacancy patterns of the existing housing stock, and the partnerships between other public and private entities.

Table 2A, which will be discussed further in the affordable housing section, provides a summary of priority needs for renters and owners living in Saint Paul with incomes less than 95 percent of the AMI. These priorities were determined through the examination of various demographic data, a review of adopted City plans and policies, agency and constituency input received during the development of the Consolidated Plan, and finally review and approval by the City Council.

Specific objectives and proposed accomplishments for housing over the 2010-2104 period are detailed in the following section. To summarize the five year, 2010-2014 period, the City will use CDBG and HOME funds to serve households up to 80 percent of the Area Median Income (AMI) by: 1) Rehabilitating and preserving 700 existing rental units, 2) Assisting 825 homeowners to rehabilitate their homes, and 3) Taking part in financing the construction of 250 new affordable housing units, including potentially up to 50 units of permanent supportive housing for the homeless. In addition, an estimated 7,100 individuals will be provided homelessness prevention support services in this period using ESG and NHRP funds. Non-homeless individuals with special needs will be able to access affordable rental housing or services provided during the 2010-2014 period.

§91.215(b) Affordable Housing

The affordable housing portion of the strategic plan provides a connection between the housing needs

assessment, the housing market analysis, and the City's plans for addressing the housing needs of households with incomes less than 80 percent of the AMI.

Implications of housing problems and needs

As discussed in §91.205, current economic reality has led to a variety of housing problems, but certain need trends remain constant. Persistently high unemployment levels have and will continue to lead to foreclosures and a demand for rental housing. Housing cost burdens are also likely to remain high as long as employment opportunities and wages remain stagnant. However, similar to the last Consolidated Plan period, renter households among a variety of family types are still in need of quality rental housing, and the need is greatest among households under 30 percent and between 31-50 percent of the AMI. On the ownership side, newer housing problems have included the failure of unsustainable mortgages (evidence of cost burdens), causing housing foreclosures. Of the owner households that manage to avert foreclosure, many of those at low and moderate incomes will continue to face cost burdens. They will demand services and will need to take actions related to lessening such cost burdens.

Implications of the housing market

The current recession and mortgage foreclosure crisis has caused a partial market correction in housing prices in many parts of the city, and that has increased the affordability of the ownership housing stock. In addition, a relatively high proportion of the single-family, duplex, and triplex properties that now sit vacant were once used as rental properties. Many of these vacant properties have substantial deferred maintenance needs; such vacancies and low values present the opportunity for their rehabilitation and future use as affordable housing (both ownership and some rental). This is particularly the case in neighborhoods served by the *Invest Saint Paul* initiative and federal Neighborhood Stabilization Program. Nonetheless, much of the housing stock in other City neighborhoods continues to remain un-affordable for low and moderate income households to purchase.

Because of the pressing needs in neighborhoods hit by vacancies and foreclosures (as well as the opportunity), City and subgrantee housing rehabilitation programs will continue to be targeted to such neighborhoods. However, it is the City's goal and policy to improve the quality of the existing housing stock as well as expand choices for residents of all income levels, regardless of the neighborhood.

As shown in Fig. 22 above, the production of affordable housing in Saint Paul dramatically increased in the last ten years, with a primary focus on multifamily rental housing. However, the reduction in federal funding for rental assistance, higher property maintenance costs, and the reduced effectiveness of funding sources to sustain affordable rental housing have put pressure on the portion of the housing stock that is rent-restricted for lower income households. However, in the short term, relatively low multifamily rental vacancies and the weak homeownership market mean that new construction will likely focus on multifamily rental projects. Very low affordable multifamily rental vacancies, recent increases in number of renters, and expiring contracts on rent-restricted properties mean that the preservation of affordable rental properties and the new construction of affordable rental projects will be crucial.

Table 2A

The summary of the data analysis of housing needs and housing market above and in previous sections,

as well as the data provided by the 2009 CHAS dataset provides the basis for the City's assigning relative priority given to each priority needs category in Table 2A.[72] The unmet need is the estimated number of eligible households in need of assistance for the ensuing five-year period that are not currently receiving assistance. Unmet need reflects the presence of a housing problem, including households experiencing cost-burdens, severe cost burdens, moderate and severe overcrowding, no income or no cash rent, and substandard housing.

On the rental side, highest priority is rental housing for households earning incomes up to 50 percent of the AMI. Given the City's existing stock of housing affordable to these income levels, preservation is prioritized as the key housing activity in this area, but new construction is also a key activity. On the ownership side, given the weak homeownership market and high cost burdens among households earning up to 80 percent of AMI, the highest priority is help homeowners avert foreclosure and the rehabilitation of this existing housing (particularly in ways that would reduce cost burdens, such as energy-conservation and -efficiency improvements). Regarding new ownership housing, 2009 CHAS data and existing City policy support the creation of housing for households between 60-80 percent of the AMI. However, given the existing stock of vacant 1-3 unit housing in this price range, a large amount of new ownership housing production is not likely in the next five years.

The following are some of the identified housing priorities from Table 2A:

- The City estimates that it has approximately 46,000 households with an unmet need (primarily cost burden, and to a lesser extent, overcrowding), which is 43 percent of the City's total number of households.

- There are broad, unmet housing needs for all types of low and moderate income rental and owner households in Saint Paul.

- Generally, the need among low-moderate income rental households is larger: 31,000 rental households have an unmet need, compared to 15,000 owner households.

- The greatest rental needs are among those with the lowest incomes, especially 0-50 percent of AMI.

- The greatest homeowner needs are among those with moderate incomes. This is consistent with the data as well as with policy in the City's Housing Chapter of the Comprehensive Plan.

- Housing needs for elderly homeowners between 0-50 percent of the AMI are high priorities because of the data as well as the fact that many are on fixed incomes.

- Housing needs for special needs populations are high priorities.

- The City's overall goal over the next five years is to assist 1,825 households using CDBG, and HOME funds (includes homeownership assistance), and to serve 7,100 individuals with supportive services using ESG and HPRP funds. These households will be assisted via housing rehabilitation, mortgage foreclosure counseling, or other City or subgrantee programs and services. Multifamily affordable rental activities may include housing preservation and/or rehabilitation, and new construction.

[72] The 2009 CHAS dataset was utilized to calculate the unmet need.

- The City's all-incomes housing policy supports options and choices for households at all income levels, including middle and upper-income households (earning above 80 percent of the AMI). Even if unmet needs for households earning 80-95 percent of the AMI are ranked low in table 2A, the City will support housing options for this group in other ways, including the use of other funding sources.

Priorities are defined as follows: High priority - Activities to address this unmet need will be funded by the City with federal CDBG, HOME, or ESG funds, either alone or in conjunction with the investment of other public or private funds during the five-year period; Medium priority - If funds are available, activities to address this unmet need may be funded by the City with federal CDBG, HOME, or ESG funds, either alone or in conjunction with the investment of other public or private funds during the five-year period; and Low Priority - The City will most likely not fund activities with federal CDBG, HOME, or ESG funds to address this unmet need during the five-year period.

Fig. 46(a). Table 2A. Priority Housing Needs

Priority Housing Needs[1] (households)		Priority		Unmet Need[2]
Renter	Small Related (≤ 4)	0-30%	H	6,332
		31-50%	H	1,646
		51-80%	M	435
		80-95%	L	26
	Large Related (≥5)	0-30%	H	5,650
		31-50%	H	1,347
		51-80%	M	318
		80-95%	L	16
	Elderly[3]	0-30%	H	2,195
		31-50%	H	1,035
		51-80%	M	440
		80-95%	L	35
	All Other (Nonfamily)	0-30%	H	8,301
		31-50%	H	2,509
		51-80%	M	774
		80-95%	L	54
Owner	Small Related (≤ 4)	0-30%	M	1,155
		31-50%	M	1,159
		51-80%	H	2,169
		80-95%	L	561
	Large Related (≥5)	0-30%	M	728
		31-50%	M	730
		51-80%	H	1,504
		80-95%	L	315
	Elderly[3]	0-30%	H	1,505
		31-50%	H	1,140
		51-80%	M	685
		80-95%	L	235
	All Other (Nonfamily)	0-30%	M	1,198
		31-50%	M	1,202
		51-80%	H	2,236
		80-95%	L	586
Non-Homeless Special Needs	Elderly (owners & renters)[3]	0-80%	H	3,480
	Frail Elderly (Extra-elderly, owners & renters)[3]	0-80%	H	3,520
	Severe Mental Illness	0-80%	H	5,594
	Physical Disability	0-80%	H	10,755
	Developmental Disability	0-80%	H	4,500 people
	Alcohol/Drug Abuse[4]	0-80%	H	4,280
	HIV/AIDs	0-80%	M	860 people
	Victims of Domestic Violence[5]	0-80%	H	*unknown*

Notes to Table 2A:

1. Housing Needs, and reported "Unmet Needs" are assumed to be the sum of all households with Housing Problems, and are

derived from Tables 3, 4, and 5 of the 2009 Consolidated Plan/CHAS dataset. Data is available at http://www.huduser.org/portal/datasets/cp.html. Table 2A outlines housing priorities as they relate to specific HUD funding sources and household eligibility, not overall housing needs. Needs in Table 2A are expressed in terms of renter or homeowner households. Needs would be addressed through the provision of a housing unit or action taken to make an existing unit more affordable. A household type at a particular income level (80-95% of AMI) may be ranked as a low priority in this table but be a higher priority in terms of other (non-HUD) funding sources.

2. Table 4 of the 2009 Consolidated Plan/CHAS dataset includes data on the number of households with housing problems by household type and tenure (elderly households are not separated out). Table 3 of the dataset includes data on the severity of specific housing unit problems by household income and tenure. It is not directly possible, from these two tables, to compute the precise number of households by family type at a particular income level that have housing needs (with the exception of elderly households); for instance, Table 4 includes the number of "large related renter households" but does not include household incomes, while Table 3 includes the number of renter households with housing problems at 0-30% of the Area Median Income, but does not include the household type. For this reason, the "unmet need" for small related, large related, and "all other" (nonfamily) renter and owner households were estimated by the City of Saint Paul based on an average percent-of-total methodology that employs data from CHAS Tables 3 and 4.
3. Table 5 of the 2009 Consolidated Plan/CHAS dataset includes data on housing problems of elderly and extra-elderly households, by household income and tenure. This is the only household type where CHAS 2009 data provides precise estimates for the number of households with housing problems by income limit. Elderly renter and owner household numbers in Table 2A above reflect these precise estimates.
4. Estimate based on US Department of Health and Human Services finding that approximately seven percent of any population has chemical dependency issues, regardless of economic status.
5. The number of victims of domestic violence was unknown. The Saint Paul Police Department maintains statistics on aggravated assaults, but not specifically on the number of victims of domestic violence.

Specific Objectives and Proposed Accomplishments

The specific objectives for housing are outlined in the City's Housing Chapter of the Comprehensive Plan, and it incorporates three broad strategies: (1) Build upon Saint Paul's strengths in the evolving metropolitan housing market; (2) Preserve and promote established neighborhoods; and (3) Ensure the availability of affordable housing across the city. Saint Paul's third strategy area, relative to affordable housing, rests on a series of interrelated initiatives that emphasize preservation, new construction, and support for a much more adequate provision of housing opportunities throughout the region. As part of the third strategy, there are two policy goals: Preservation (preserve and stabilize existing publicly - assisted affordable housing) and New production (a minimum of 30 percent of new housing units produced with City/HRA financing should be affordable to rental households with incomes at or below 60 percent of the AMI or owner households with incomes at or below 80 percent of AMI). The Comprehensive Plan was adopted in 2010.

In addition, the City's Annual Housing Action Plan will outline the housing activity targets and funding levels to implement the policies of the Housing Chapter of the Comprehensive Plan on an annual basis.

The following is a summary of the specific adopted objectives (City policies and objectives, adapted from the Comprehensive Plan) as well as accomplishments to meet the identified critical housing needs and priorities:

Support the preservation of publicly-assisted and private affordable housing (Strategy 3, objective 1, Housing Chapter of the Comprehensive Plan).

Actions

- Partner with nonprofits, for-profits, and philanthropic partners to support the preservation of public housing, representing 4,249 total dwelling and non-dwelling units, and an insured value of $560 million;
- Support the application of Low Income Housing Tax Credits, and other appropriate funding sources to maintain low income units;
- Support and advocate for regional, state, and federal legislation and policies that provide

funding or vehicles for construction and preservation of affordable housing, including public housing;

- Support the preservation of other low-income housing units under private ownership and management;
- Continue to support the use of state property tax incentives for affordable rental housing; and
- When the City/HRA demolishes affordable housing, the City's existing replacement housing policy should be followed.

As shown in Figures 46(b) and (c) below, Priority Housing Activities, total accomplishments in this area will be the rehabilitation (and preservation) of 700 existing rental units, serving 140 households at 0-30 percent of AMI, and 280 households within each of the 31-50 and 51-80 percent of AMI income cohorts. While aggressive, this represents 35 percent of the 2,000 total estimated units that need to be preserved in the 2010-2014 period (see §91.210(b) for estimates).

Fig. 46(b). Table 2A. Priority Housing Activities

Priority Need	**5-Yr. Goal Plan/Act**	Yr. 1 Goal Plan/Act	Yr. 2 Goal Plan/Act	Yr. 3 Goal Plan/Act	Yr. 4 Goal Plan/Act	Yr. 5 Goal Plan/Act
CDBG						
Acquisition of existing rental units						
Production of new rental units	**100**	20	20	20	20	20
Rehabilitation of existing rental units	**600**	120	120	120	120	120
Rental assistance						
Acquisition of existing owner units						
Production of new owner units	**50**	10	10	10	10	10
Rehabilitation of existing owner units	**800**	160	160	160	160	160
Homeownership assistance						
HOME						
Acquisition of existing rental units						
Production of new rental units	**100**	20	20	20	20	20
Rehabilitation of existing rental units	**100**	20	20	20	20	20
Rental assistance						
Acquisition of existing owner units						
Production of new owner units						
Rehabilitation of existing owner units	**25**	5	5	5	5	5
Homeownership assistance	**50**	10	10	10	10	10
Other						

Note: This table assumes that HUD entitlement funding over the 2010-2014 period to the City of Saint Paul remains at the same level as it was over the 2005-2009 period. The City does not receive HOPWA funds, so this item is not included in the table.

Engaging in aggressive housing rehabilitation, including energy-related improvements to the existing housing stock (Strategy 2, objective 2, and policy 2.4, Housing Chapter of the Comprehensive Plan)

Actions:

- Assess the market viability, maintenance needs, and neighborhood context of a house, including the:
  - Type and cost-effectiveness of "basic and necessary" improvements.
  - Concentration of units with similar exterior conditions in the vicinity.
  - Possible synergies between the housing rehabilitation project and nearby public and private assets (e.g., schools, parks, community centers, new developments, infrastructure, public art, etc.).
  - Historic significance of the property.
- Improve energy efficiency and water conservation within the existing housing stock.
  - Strongly encourage homeowners to take full advantage of existing programs, tax rebates/credits, loan funds, and other tools to increase energy efficiency and water conservation in their homes;
  - Continue and formalize partnerships with existing organizations that provide energy audits to existing homeowners. Households receiving City/HRA housing rehab loans should especially be encouraged to do a home energy audit and implement recommended retrofits.
  - Establish partnerships with organizations such as the Energy Cents Coalition and Community Action Partnership of Ramsey and Washington Counties to ensure that their programs and resources, designed specifically for lower-income households, are used to the fullest extent possible.
  - Entice responsible owners/managers of rental housing to make energy-efficiency improvements to their properties to improve housing affordability.
- Encourage homeowners and property managers to make passive green improvements to their properties.
- Coordinate code enforcement with housing rehabilitation loans or other housing rehab assistance, including non-City programs, to improve the energy-efficiency of homes.
- Create a centralized location for all housing rehabilitation-related resources, such as a webpage with links to organizations that provide rehab assistance or services.

As shown in Figures 46(b) and (c), Table 2A. Priority Housing Activities, total accomplishments in this area will be the rehabilitation of 825 existing owner-occupied units, with 179 households served at 0-30 percent of AMI, 335 households served at 31-50 percent of the AMI, and 310 households served at 51-80 percent of AMI. This goal represents approximately 5.4 percent of the City's 15,215 households with problems/needs at 0-80 percent of the AMI.

Support new housing opportunities for low-income households throughout the city, and provide affordable housing in new production projects. (Strategy 3, objective 2, and policies 3.2 and 3.3, Housing Chapter of the Comprehensive Plan)

Actions:

- For City/HRA-assisted new rental units, at least 30 percent will be affordable to households earning 60 percent of the AMI, of which at least one third will be affordable to households earning 50 percent of the AMI, and at least one third will be affordable to households earning 30 percent of the AMI;

- For City/HRA-assisted new ownership units, at least 20 percent will be affordable to households earning up to 80 percent of the AMI, and an additional 10 percent will be affordable to households at 60 percent of the AMI;
- Explore mechanisms to ensure that affordable ownership units that are developed remain affordable for at least 10-15 years, especially in existing stable neighborhoods;
- With partners, support and provide services such as financial counseling, pre- and post-purchase training, and mortgage foreclosure prevention; these services are key to the success of homeowners, particularly those with lower incomes;
- Provide adequate zoning/land for multi-family development to support the production of at least 2,625 new units affordable to households earning up to 60 percent of the AMI;
- Explore and implement demonstrated incentive zoning tools, including density bonuses, parking reductions, and other creative mechanisms, to facilitate and encourage the market to produce new affordable housing.

As shown in Table 2A. Priority Housing Activities, total accomplishments in this area will be the new production of 200 rental units, and 50 homeownership units. On the rental side, the goal is to serve 40 households at 0-30 percent of AMI, and 80 households within each of the 31-50 and 51-80 percent of AMI income cohorts. On the ownership side, the goal is to serve five households within each of the 0-30 and 31-50 percent of the AMI income cohorts, and 40 households at the 51-80 percent of the AMI.

Assist in the preservation and production of homeless and supportive housing. (Strategy 3, policy 3.4, Housing Chapter of the Comprehensive Plan). The City will continue to participate in the State and local plans to end long term homelessness. The primary type of housing to meet this need will be permanent supportive housing. The number of new permanent supportive housing units to be produced may reach 50 by 2014.

Actions:

- Site permanent supportive and homeless housing to increase locational choices in an area, and increase the distribution across the city;
- Continue City/HRA involvement in groups such as the Interagency Stabilization Group, the Saint Paul/Ramsey County Funders Council, and the Heading Home Ramsey Advisory Board;
- Examine and update the existing Saint Paul Zoning Code to correspond with the current state and county licensing and registration requirements and group housing programs;
- Encourage non-City funding sources to (continue to) provide resources for supportive and homeless housing.

Other Specific Objectives

Vacant housing assessment and other neighborhood revitalization efforts. The City will continue to assess vacant housing conditions with City/HRA partners such as community development corporations, nonprofit organizations, private developers, district councils, and block groups, and prioritize City/HRA revitalization assistance to areas with less vibrant housing markets. This work has occurred under the *Invest Saint Paul* initiative, as well as the ongoing Neighborhood Stabilization Program (NSP). NSP funds must be used for housing affordable to households up to 50, 80, and 120 percent of the AMI.

Fig. 46(c). Table 2A. Priority Housing Activities, Investment Plan Table

Priority Need[1]	5-Yr. Goal Plan/Act	Yr. 1 Goal Plan/Act	Yr. 2 Goal Plan/Act	Yr. 3 Goal Plan/Act	Yr. 4 Goal Plan/Act	Yr. 5 Goal Plan/Act
Renters (includes rehabilitation)	900	180	180	180	180	180
0 - 30 of MFI	180	36	36	36	36	36
31 - 50% of MFI	360	72	72	72	72	72
51 - 80% of MFI	360	72	72	72	72	72
Owners (includes rehabilitation)	875	175	175	175	175	175
0 - 30 of MFI	184	37	37	37	37	37
31 - 50 of MFI	340	68	68	68	68	68
51 - 80% of MFI	350	70	70	70	70	70
Homeless[2]						
Individuals receiving services	7,100	1,420	1,420	1,420	1,420	1,420
Housing units (new units)	50	10	10	10	10	10
Non-Homeless Special Needs[3] (new units only)						
Elderly	50	10	10	10	10	10
Frail elderly (assisted living)	0					
Severe Mental Illness	0					
Physical Disability[4]	12	2	2	2	2	3
Developmental Disability	0					
Alcohol or Drug Addiction	0					
HIV/AIDS	0					
Victims of Domestic Violence	0					
Total	1,775	355	355	355	355	355
Total Section 215	1,775	355	355	355	355	355
215 Renter	900	180	180	180	180	180
215 Owner	875	175	175	175	175	175

Notes:
1. This table assumes that HUD entitlement funding over the 2010-2014 period to the City of Saint Paul remains at the same level as it was over the 2005-2009 period.
2. Homeless individuals and families are assisted either with supportive services, or through permanent housing units. New homeless units are a subset of the other new affordable rental housing listed in this table.
3. Any of the non-homeless special needs subgroups identified could benefit from a typical affordable housing development, but it is difficult to predict the number of individuals of each subgroup that will live in any new development. New affordable housing units serving non-homeless special needs households are a subset of the other renter or owner housing units listed above.
4. ADA requirements apply to new construction (five percent of new units built must be ADA-compliant) - http://www.hud.gov/offices/fheo/disabilities/accessibilityR.cfm.

Support and meet market demand for transit-oriented housing along City corridors, including affordable housing. The City will continue to pursue new land-efficient and transit-oriented housing developments along its corridors during the period, especially along Central Corridor. Land-efficient

housing refers to residential development that makes the most of (re-) development sites, including higher density multifamily buildings located along and near busy streets and compact infill housing within neighborhoods. Transit-oriented housing is located on compact infill sites close to job centers and transit nodes, with appropriate amounts of affordable housing.

Ensure fair housing in the City of Saint Paul. The City recognizes that over thirty years have passed since the original enactment of the Federal Fair Housing Act prohibiting discrimination in housing and yet bias continues to affect Saint Paul's racial and ethnic minorities, the disabled and families with young children. The task of overcoming bias must be accepted as the joint responsibility of federal, state, county and city governments in cooperation with private and non-profit sectors. The City is unable to project proposed accomplishments because of the nature of this objective. It is also difficult to project accomplishments because the City will partner with other entities on this objective. However, the City believes that this objective is essential to a complete affordable housing strategy.

Encourage services and programs that support "lasting" homeownership, including providing mortgage foreclosure prevention programs, personal finance education, and homeowner assistance. The City will continue to provide mortgage foreclosure prevention programs with its community partners, as well as first time homebuyer mortgage programs including special assistance to pay entry costs. The City's program is expected to provide down payment assistance to up to 50 households in the five-year period.

Challenge and assist the Metropolitan Council and the region's other municipalities to provide their share of affordable housing units. The City is unable to project proposed accomplishments because of the nature of this objective. It is also difficult to project accomplishments because the City will partner with other entities on this objective. However, the City believes that this objective is essential to a complete affordable housing strategy.

Educate the community on the importance of affordable housing and work to eliminate the negative perception of affordable housing. The City is unable to project proposed accomplishments because of the nature of this objective. It is also difficult to project accomplishments because the City will partner with other entities on this objective. However, the City believes that this objective is essential to a complete affordable housing strategy.

§91.215(c) Homelessness

The City of Saint Paul proactively is addressing the problems of homelessness in numerous ways. Most important, the City has strengthened its relationships with Ramsey County and service providers to establish a coordinated system that serves homeless and "at-risk of being homeless" individuals, families, and youth. Most recently, under the American Recovery and Reinvestment Act, the City is leveraging its Homelessness Prevention and Rapid Re-Housing Program (HPRP) funds with Ramsey County Continuum of Care's Family Homelessness Prevention Assistance Program (FHPAP) to create comprehensive homelessness prevention delivery services that can assist homeless single adults, homeless families, and homeless unaccompanied youth. Furthermore, in partnership with the Ramsey County, the City is able to respond to underserved homeless populations, such as new refugee families and homeless veterans.

In the past, Ramsey County and the City of Saint Paul developed an overall strategy called *Heading Home Ramsey* which establishes a plan to end homelessness in Ramsey County by improving housing and supportive services for Saint Paul's homeless residents. The initial plan was developed with community input from the City/County Homelessness Advisory Board, including organizations such as the St. Paul Public Housing Agency, the Corporation for Supportive Housing, supportive housing providers, and homeless residents. The Plan was built upon existing information about emergency shelter and shelter services as well as the needs of low-income individuals or families who experienced a housing crisis.

To implement *Heading Home Ramsey*, the City participates with the Funders' Council which meets monthly to coordinate the financing necessary to produce more shelters, transitional housing, supportive housing and permanent affordable housing that serve all residents, including homeless individuals, families, and youth.

The *Saint Paul-Ramsey County Five-Year Low Income Housing and Homeless Services Report and Plan* has developed the following strategies:

1. Strategies for helping low-income families avoid becoming homeless;

Affordable Housing and Permanent Supportive Housing. As previously stated, more than 50 percent of homeless adults and 70 percent of homeless families cite the lack of affordable housing as the reason for entering homeless shelters. In response, Saint Paul has been aggressively working to create more permanent housing affordable to low and moderate income residents. In compliance with the City's Affordable Housing Policy, the City's Housing 5000 Program (2002-2005) created 1,171 new housing affordable to households at 30 percent and 50 percent of area median income. This program also addressed several community needs. First, Saint Paul produced more housing that was appropriately-sized for large families. Second, Saint Paul created more permanent supportive housing that met the diverse needs of Saint Paul's community. At the same time, under *Heading Home Ramsey*, the City and County established an ambitious goal to produce 920 units of supportive housing by 2010. Since 2005, Saint Paul has aggressively worked with HUD, Minnesota Housing, and local foundations to achieve this goal. By the end of 2009, 739 supportive housing opportunities were financed – even during tough economic times. Still, it should be noted that the housing market dramatically declined in 2008. However, in 2009, Saint Paul leveraged its local City funds with federal HOME funds, federal CDBG funds, federal Low-Income Housing Tax Credits, and federal Section 1602 Tax Credit Exchange funds, and Tax Credit Assistance Funds (federal stimulus funds) to create available financing for 192 new

affordable housing units, including 29 permanent supportive housing units while preserving 35 affordable family housing units. Additionally, with the abovementioned funds, the City was able to establish some financing tools for two additional housing developments, including the preservation of 103 affordable housing units. Although these two developments will require additional financial support from Saint Paul's other funding partners, the City will assertively use its Low Income Housing Tax Credits allocation to leverage financing for other affordable housing developments.

Homelessness Prevention Strategies. In addition to financing more affordable housing, the City and County are reaching more Saint Paul residents in need by developing other homeless prevention strategies as follows:

a. The City's Emergency Shelter Grant Program funds the operations of existing emergency shelters, transitional housing for homeless individuals, families and youth, and supportive services. In addition to serving homeless residents and at-risk of being homeless residents, the Emergency Shelter Grant Program has been a consistent funding source to offset some of the operating costs of emergency shelters, transitional housing, and other support services. Furthermore, many social service providers are able to use ESG allocations to leverage other private funds needed to serve at-risk of being homeless and homeless residents.

b. In leveraging federal stimulus funds, the City can use its Homelessness Prevention and Rapid Re-Housing (HPRP) Funds to better serve the needs of our homeless Saint Paul residents. More specifically, the federal stimulus HPRP grant provides the financial base to systemically address homelessness in Saint Paul. Furthermore, HPRP provides an opportunity for Saint Paul to work with Ramsey County Continuum of Care to develop comprehensive approach to assist our homeless single adults, homeless families, and homeless unaccompanied youth. The benefits of HPRP are multi-fold. The City and County can assist at-risk of homeless individuals and families to avoid homelessness and remain within their homes. At the same time, HPRP assists Saint Paul residents living in emergency shelters to move out of shelters and work toward self-sufficiency.

c. The City's Mortgage Foreclosure Prevention Program (MFPP) provides intensive mortgage default counseling and emergency loans to Saint Paul homeowners facing foreclosures as well as MFPP coordinates community resources necessary to stabilize the family household.

d. Saint Paul continues to develop community safety nets that can lower the barriers to securing or maintaining housing. For example, Saint Paul funds Southern Minnesota Regional Legal Services. Its major program provides legal representation to low-income tenants, and its Housing Equality Law Project provides legal representation to individuals and families experiencing housing discrimination. Ramsey County has two very effective programs - Emergency Assistance Program and Diversion Program - that successfully assist many households retain their homes. Ramsey County Public Health Department administers Housecalls, which makes emergency repairs necessary to avert housing displacement. Saint Paul also has CAP agencies and Salvation Army's Heat Share that assist needy households with payment of delinquent utility bills.

Saint Paul also has many community organizations that provide homeless prevention assistance by providing housing search, utility assistance, emergency funds, case management, and housing advocacy. Finally, the City has strong housing advocacy programs, such as Community Stabilization Project which

works with the tenants and landlords to correct serious building code violations in rental housing in order to avert condemnation and forced evictions of families.

The City and County will develop new housing strategies for chronically-homeless residents, as noted in the Continuum of Care. These new strategies recognize that chronically-homeless residents and long-term shelter users often consume more than half of the shelter resources so other residents cannot secure emergency shelter or transitional housing, when necessary. As previously noted, the City worked with Catholic Charities and the State of Minnesota to develop 60 units of supportive housing for the chronically-inebriated residents. The City also worked with Catholic Charities to open a shelter for homeless women. Recently, the Delancey Apartments opened to provide stable housing for 13 chronically-homeless individuals. Finally, the City and County listened to community needs and recently provided additional funding for a winter overflow emergency shelter.

2. Strategy for reaching out to homeless persons and assessing their individual needs;

Nonprofit organizations and service providers provide community outreach, drop-in centers, meals, and other direct services to reach out to homeless residents and at-risk of being homeless residents. Many of these services are currently supported in part by City of Saint Paul's Community Organization Partnership Program (COPP), the County's Family Homelessness Prevention Assistance Program (FHPAP), the City's Emergency Shelter Grant Program (ESG), and the City's Homelessness Prevention and Rapid Re-Housing Program (HPRP).

Ramsey County also provides counseling and case management on various sites, such as the Health Care for the Homeless, a collaborative project of the Ramsey County and neighborhood health centers, which offers basic health services to the homeless at the shelters and transitional facilities.

To assess homeless needs citywide, Wilder Research Center conducts an annual survey of homeless shelters, battered women's shelters, and transitional housing residents. Wilder Research Center and Ramsey County Continuum of Care also interview many unsheltered homeless residents who may live outside, under bridges, and in places not designated for human habitation.

Finally, it should be noted that the City and County work with social service providers to develop innovative programs that address the needs of homeless residents and at-risk of being homeless residents. First, homeless residents have participated with the *Heading Home Ramsey Plan to End Homelessness*. Second, the City and County sponsored innovative services, such as Project Homeless Connect (an event to coordinate homeless prevention services with homeless residents) Twin Cities Community Voice Mail (provides voice messaging services through which homeless residents can maintain contact with families, employers, and schools), and Saint Paul Police Homeless Outreach Project (City Attorney and Saint Paul Police work with ACCESS Program with outreach to homeless residents with mental illness who are living outside). Additionally, the City has great programs like the Title 1 Homeless Program of the Saint Paul Public Schools which dutifully helps homeless youth remain in their school of origin.

3. Strategy for addressing the emergency shelter and transitional housing needs of homeless persons;

The City and Ramsey County is continually working with service providers to coordinate programs that impact all homeless populations. As an example, the City and County worked to expand the Dorothy

Day Extended Hour program. Additionally, the City and County participate with the Funders' Council in order to coordinate the necessary financing for supportive housing and support services.

As working partners, the City and the County developed the Ramsey County Continuum of Care - a comprehensive approach to ending homelessness. The City and County also work with the Saint Paul/Ramsey County Homeless Advisory Board as well as coordinate the annual emergency shelter reports that are provided to City and County elected officials. More importantly, the City was able to leverage its federal HPRP funds with the County's FHPAP to comprehensively serve homeless residents and at-risk of being homeless residents. With this collaboration, the City and the County has an opportunity to develop new social service delivery methods during 2009-2012. For example, the City and County now fund a Housing Crisis Response Center – a collaboration of multiple community services – that can offer homelessness prevention services (preventing homelessness) and rapid re-housing services (helping emergency shelter residents find new housing). HPRP also allows the City and County to evaluate the effectiveness of community-based programs in expectation of potential changes of the HEARTH Act which may redesign the federal McKinney-Vento Emergency Shelter Grant Program.

4. Helping homeless persons make the transition to permanent housing and independent living.

Ramsey County provides specific programs and counseling to previously-institutionalized or homeless individuals through partnerships with nonprofit service providers to assist in the transition to permanent housing. This relationship is the primary network that performs this function and includes assistance such as help with security deposit, child care, job training, transportation, mental health counseling, chemical dependency treatment, and job search assistance. On the other hand, since 2002, the City of Saint Paul has developed supportive housing facilities, such as Crestview, Visitation, and Jackson Street Village, Jeremiah Program, St. Christopher's Place, and Saint Paul's Residence, which serves at-risk individuals and families. In 2009, Saint Paul Public Housing was able to secure 100 additional Section 8 vouchers to assist families in need of reunification. Overall, the City and County work with its partners to financial resources to create programs that assist homeless residents.

§91.215(d) Other Special Needs

Housing and supportive services are provided within the City of Saint Paul to persons who are not homeless but need supportive housing, including the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS, persons with chemical dependency, and persons with limited English-speaking proficiency. The priority housing needs of these specific populations are listed in Table 2A. Nonetheless, these diverse communities have stated that more affordable housing and affordable supportive housing are needed citywide. In response, the City of Saint Paul has again adopted a Comprehensive Plan including a Housing chapter with a major strategy to ensure there is adequate affordable housing.

Furthermore, the City's Housing 5000 produced at least 2,000 new affordable units, including 236 supportive housing units that serve individuals, families, and youth. Additionally, policy 1.1 of the City's Housing Chapter of the Comprehensive Plan calls for increased housing choices across the city to support economically-diverse neighborhoods, including low and moderate income housing. Moreover, the City also supports efforts to develop more supportive housing to serve chronically-homeless individuals.

Finally, in preparation of the last Consolidated Plan, the City heard concerns that many individuals need

accessible-designed housing that accommodates persons of all abilities. Many multifamily Housing 5000 developments were built in compliance with ADA, and visitability design features may be included in future developments. Additionally, the City continues to support and engage in home rehabilitation strategies that maintain housing affordability, as well as address the accessibility needs of low and moderate income homeowners.

§91.215 (e) Non-Housing Community Development Plan

The City of Saint Paul has used CDBG funding to address non-housing community development needs since the inception of the program, to help provide a suitable living environment for City residents. The City plans to continue to use CDBG funds for these types of activities in future years. The flexibility of the CDBG program allows the City to use this funding to carry out activities which complement all of the housing activities being carried out with CDBG, HOME and ESG funding. The CDBG funding is used to supplement other funding sources available to the City for community development needs, which are not adequate to address all of the non-housing needs in the City. CDBG funding is targeted to activities which provide benefit to large numbers of low and moderate income persons. Table 2B, found at the end of this section, shows the Priority Need Level, the Unmet Priority Need, the estimated Dollars to Address the Need over the next five years, as well as the five year Goals for addressing these needs with CDBG funds.

Public Facility Needs

The City has over 30 recreational facilities (which include senior centers, youth centers, and neighborhood facilities), 4000 acres of parkland, more than 80 tot lots, a zoo, 4 golf courses, and 13 library facilities located through out the City, as well as a number of parking facilities which are primarily located in the downtown area. There are also over 300,000 trees on City property. All of this property requires periodic improvement, expansion or replacement. City bond funds are used to finance many of these activities, but CDBG funding is also used to finance facilities which primarily serve low and moderate income areas of the City. The City anticipates that it will continue to use CDBG funding for eligible public facility activities over the next five years, most likely for parks and recreational facilities. The City also anticipates that it will continue to use HUD funding (primarily ESG) for homeless facilities.

Infrastructure Needs

The City has nearly $3 billion worth of infrastructure (850 miles of streets, 1,100 miles of sidewalks, 1,250 miles of sewers, 331 bridges, and 32,000 street lights) that it maintains and operates. The repair and replacement of this infrastructure is very important to the City, and these types of improvements are predominantly financed with a number of local, County, State, and other Federal funding sources. Because of this, CDBG funds are generally not used for infrastructure activities. The City does not anticipate using CDBG funds for infrastructure improvements over the next five years, but sidewalks, street, and sewer improvements may possibly be funded with CDBG if they meet a national objective of the program, and if other funding sources are not available.

Public Service Needs

Ramsey County is the primary provider of public services in the City of Saint Paul. The County receives Federal, State, and local funding for health services, employment and training services, environmental services, and other human/social services. Since there is more need for these types of activities in the City than the County is able to provide, City funding is also used (including up to the maximum allowed 15 percent of CDBG funds) to provide additional public services for the 275,000+ Saint Paul residents. Health services, senior services, crime prevention, community organizing, youth employment training, other youth services, as well as other public service activities are all currently funded with CDBG dollars. The City anticipates that it will continue to fund these types of activities over the next five years. The City is also seeing a need for service-enriched housing, which would provide daily living skills

(mentoring) for occupants of such housing, as well as a need for increased job training which would help people have the potential to earn a livable wage.

Economic Development Needs

The City and its subgrantees have used CDBG funding to assist eight to ten economic development activities per year over the last five years, and it is anticipated that they will continue to do so over the next five years. When used for economic development, CDBG funding is primarily used for the rehabilitation or development of commercial properties, or for direct financial assistance to businesses. These activities help the City retain and attract businesses, and also help to create jobs for city residents. Businesses that receive CDBG funding must either have a low/moderate income service area, or create jobs for low/moderate income persons. The City will work on the renovation and/or redevelopment of vacant and/or traditional commercial and industrial buildings. The City and its partners will also promote green industries, energy-efficiency building retrofits, light manufacturing, start-up businesses, sustainable farming, medical devices (or life science industries more generally), financial services, distribution services/centers and other high-tech businesses. All of these may create living wage jobs, or retain such jobs. The City will also provide technical assistance to small and emerging businesses.

Planning Needs

Over the next five years the City plans to use CDBG and local funding to pay for planning needs in Saint Paul, which will help the City determine where to target its investments. Planning activities include updating sections of the Comprehensive Plan, completing small area plans, administering zoning and land use regulations, and completing historic and environmental reviews. The City will use CDBG funding for planning activities carried out in low/moderate income areas of the City; such activities may include completing HUD-required environmental and historical reviews, and/or conducting property surveys in the field.

Fig. 47. Table 2B. Priority Community Development Needs

Priority Need	Priority Need Level[1]	Unmet Priority Need[2]	Dollars to Address Need[2]	5 Yr Goal[1] Plan/Act	Annual Goal Plan/Act	Percent Goal Completed
Acquisition of Real Property	M	15 sites	$15,000,000			
Disposition	L					
Clearance and Demolition	M	500 properties	$7,500,000	100		
Clearance of Contaminated Sites	M	5 sites	$5,000,000	0		
Code Enforcement	L					
Public Facility (General)	M					
Senior Centers	See Parks/Rec					
Handicapped Centers	See Parks/Rec					
Homeless Facilities (new facilities)	M	50 homeless youth	$5,000,000	0		
Youth Centers	See Parks/Rec					
Neighborhood Facilities	See Parks/Rec					
Child Care Centers	M					
Health Facilities	L					
Mental Health Facilities	L					
Parks and/or Recreation Facilities	M	60 facilities	$79,000,000	5		
Parking Facilities	M	15 facilities	$5,000,000	0		
Tree Planting	L	20,000 trees	$21,000,000	0		
Fire Stations/Equipment	L					
Abused/Neglected Children Facilities	Covered in other	categories				
Asbestos Removal	Covered in other	categories				
Non-Residential Historic Preservation[3]	M	428 commercial corridor properties	$42,800,000	1		
Other Public Facility Needs-Libraries	M	7 facilities	$35,000,000	0		
Infrastructure (General)	L					
Water/Sewer Improvements	L	10 projects	$70,000,000	0		
Street Improvements	M	110 projects	$130,000,000	0		
Sidewalks	M	115 projects	$10,000,000	0		
Solid Waste Disposal Improvements	L					
Flood Drainage Improvements	See Water/Sewer					
Other Infrastructure	L					
Public Services (General)	M					
Senior Services	M	10,000 people	$20,000,000	1,500		
Handicapped Services	M	12,000 people		0		
Legal Services	M	15,000 people	$10,000,000	3,000		
Youth Services	M	25,000 people	$25,000,000	2,000		
Child Care Services	M	10,000 people	$20,000,000	0		
Transportation Services	M					
Substance Abuse Services	M	18,000 people	$20,000,000	0		
Employment/Training Services	H	20,000 people	$40,000,000	2,000		
Health Services	M	45,000 people	$30,000,000	7,500		
Lead Hazard Screening	M	25,000 people	$7,500,000	0		
Crime Awareness	M	25 organizations	$5,000,000	15		
Fair Housing Activities[4]	H	See note 4	$500,000+	See note 4		
Tenant Landlord Counseling	H	7,500 households	$250,000	7,500		
Other Services	L					
Economic Development (General)	H					
C/I Land Acquisition/Disposition	M	75 properties	$37,500,000	2		
C/I Infrastructure Development	L	100 projects	$30,000,000	0		
C/I Building Acq/Const/Rehab[5]	H	1,578 buildings	$157,800,000	30		
Other C/I						

Energy Efficiency Building Retrofits[6]	M	2,200 buildings	55,000,000	1		
ED Assistance to For-Profit	H	300 businesses	$15,000,000	3		
ED Technical Assistance	M	250 businesses	$2,500,000	0		
Micro-enterprise Assistance	M	125 businesses	$2,500,000	0		
Other	L					

Notes to Table 2B:

1. Priority Need Level relates to the use of CDBG, HOME, or ESG funds to address the need. The five-year goal is the estimate of what will be accomplished with CDBG, HOME , or ESG funding over the next 5 years, assuming current funding levels are maintained.
2. The Unmet Priority Need is the estimated total need citywide.
3. According to a 2001 context study, an estimated 428 commercial properties along the city's neighborhood commercial corridors are undesignated and may need further survey work to determine their historic designation eligibility, and/or funds for their rehabilitation and/or restoration. Specific commercial needs identified include, but are not limited to, auto dealerships and early gas stations. The average rehabilitation/restoration cost of a commercial property is assumed to be $100,000. The City lacks an industrial historic context study, so the total number of industrial properties with such needs is unknown; however, the City's Comprehensive Plan indicates that such needs are significant, and a context study for industrial properties is recommended.
4. The City funds many organizations that have multilingual/multicultural staff to ensure that all of Saint Paul's population can adequately access services. Because of Saint Paul is a diverse community, it is difficult to estimate all of the various programs or services provided that might qualify under the rubric of fair housing activities.
5. Of the estimated 3,156 commercial/industrial properties in Saint Paul, an estimated 50 percent have commercial acquisition, renovation, or rehabilitation needs, at an average cost of $100,000 each project. (Vacant land is not included).
6. Of the estimated 3,156 commercial/industrial properties in Saint Paul, an estimated 75 percent have retrofit needs for energy-efficiency, at an average cost of $25,000 each project. (Vacant land is not included).

§91.215(f) Barriers to Affordable Housing

The City of Saint Paul recognizes that developing affordable housing is often a difficult task. In this section, the City identifies strategies to remove barriers to affordable housing.

The City of Saint Paul has long supported affordable housing so that 16,460 Saint Paul households (36 percent of all City renters) now receive housing assistance (including 12,228 publicly-assisted housing units/beds and 4,232 Section 8 vouchers). In 1999, the City Council also adopted an affordable housing policy to create more affordable housing in Saint Paul. During 2002-2005, the City's Housing 5000 Program financed 1,771 new housing units affordable to 30 percent and 50 percent of the AMI, and an additional 276 units affordable to households at 60 percent of the AMI. The City modified but re-adopted an affordable housing policy in the recent update to its Housing Chapter of the Comprehensive Plan, committing the City/HRA to finance 30 percent of its new housing construction as affordable units.

To preserve affordable home ownership, the City's Home Loan Fund first provides low interest mortgage financing to purchase homes. Second, the City allocates some CDBG funds for low-interest home improvement loans so that low and moderate income households can maintain their homes (mainly serving households up to 50 percent of the AMI). Third, the City's Mortgage Foreclosure Prevention Program provides default counseling and one-time, interest-free due on sale loans to homeowners who are at risking of losing their homes by default.[73] At this time, the abovementioned programs remain in effect.

Developing and Maintaining Affordable Supportive Housing. The City recognizes that many residents have poor credit, a history of tenancy problems, and personal issues that prohibit access to affordable housing. In particular, the credit of many households that have experienced foreclosure has been

[1] Such loans are a last resort option and recipients must be able to prove long term affordability.

profoundly impacted during the current crisis. In turn, the City allocates HOME and ESG funds to provide affordable housing and individualized support services so that homeless persons, families, and youth have a stronger chance to access permanent affordable housing.

During 2002-2005, the City's Housing 5000 program produced 236 units of new supportive housing that served homeless and individuals, families and youth at-risk of becoming homeless. More important, these supportive housing developments address many diverse community needs of elderly, frail elderly, persons with disabilities, vulnerable youth, persons with HIV/AIDS, and chemically-dependent persons.

With federal support, the City will administer HUD's Emergency Shelter Grant (ESG) to financially support existing emergency shelters, battered women's shelters, and transitional housing.

Service Fees. With federal and state budget constraints, local municipalities must rely upon service fees to pay operational costs. In response, City of Saint Paul will continue to propose reasonable service fees that are commensurate with municipal costs. Still, the City must continue to seek alternative financing to build affordable housing when receiving less support from the federal and state governments.

Promoting Locational Choice of Affordable Housing. As a fully-built city, Saint Paul has less available land to build affordable housing. Nonetheless, the City adopted a locational choice policy to encourage the development of affordable housing citywide (policy 1.1 of the Housing Chapter of the Comprehensive Plan). To implement this policy, the City Council may evaluate current housing subsidies needed to build affordable housing citywide.

Rental Property Tax Rates. As discussed above, the State's rental property tax structure was altered in 2005 to reduce the property tax rate for rental properties subsidized under a federal or state government program with restricted affordable rents. However, legislative priorities can shift, and property tax reforms often put additional burden on affordable housing properties. Although statewide reforms have been made, the City must continually advocate for progressive affordable housing tax reform.

Changes in Housing Market - Preserving Existing Affordable Housing. The City faces constant pressures to preserve existing affordable housing developments. In the past, the City preserved federally-subsidized housing, such as Skyline Towers, Central Towers, and Torre de San Miguel. The City will continue to work aggressively to preserve existing affordable housing - albeit the task is more difficult with less federal and state support.

Need for Accessible-designed Housing. While many multi-unit affordable housing developments are built to ADA compliance standards, many physically-challenged persons cannot easily access private-market or affordable housing in Saint Paul. In response, policy 2.18 of the City's Housing Chapter of the Comprehensive Plan encourages universal design features.

Additionally, the City financially supports the Fair Housing Implementation Council which funds HousingLink's referral service that coordinates available accessible housing units with individuals with disabilities.

Promoting Fair Housing. Housing discrimination can be a significant barrier for individuals and families seeking affordable housing. While discrimination is often difficult to detect, discrimination against persons on the basis of race/ethnicity, familial status, language, gender, age, disability and receipt of

public assistance can prevent access to safe and decent housing.

In response, the City's Human Rights and Equal Economic Opportunity (HREEO) Department assists residents who have housing discrimination claims. Second, the City is a jurisdiction member and funder of the Fair Housing Implementation Council. Third, the City supports the Housing Equality Law Project of the Southern Minnesota Regional Legal Services. In the future, the City remains committed to promoting Fair Housing efforts.

§91.215 (g) Lead-Based Paint Hazards

Lead-Based Paint - Past Actions

Saint Paul-Ramsey County Public Health Department conducts ongoing comprehensive efforts involving outreach, identification, education and treatment of lead-based paint hazards. More specifically, the Childhood Lead Poisoning Prevention Program identifies children with elevated blood levels (>10 mcg/dL) in many ways. The State of Minnesota has an excellent reporting and referral program and screening is completed locally in targeted WIC clinics and by primary care providers. Public Health nurses, lead hazard control personnel, and City rehabilitation advisors also provide educational and outreach materials to families of children at-risk to lead and to properties owners who are renovating their homes.

Saint Paul-Ramsey County Public Health provides an extensive educational and outreach program. The Public Health staff responds daily to numerous phone community inquiries about lead poisoning, lead hazard reduction, and lead testing. Additionally, the Public Health staff conducts in-services to parents, health care workers and others on lead screening, risk assessment, the symptoms and effects of lead poisoning and treatment methods. Furthermore, classes in lead safe work practices are offered to contractors, property owners, rehabilitation advisors and other interested individuals.

Parents and property owners can also receive information on the prevention of lead poisoning and instructions on how to safely abate lead hazards. To promote better understanding of lead-based paint hazards, these pamphlets are available in English, Spanish, Vietnamese, Russian, Arabic, and Somali languages.

Federal funding has enabled the City of Saint Paul to continue its successful effort of lead hazard control. Through the Healthy Homes and Lead Hazard Control Program, many homes occupied by children with elevated blood lead levels or at risk to lead poisoning have had substantial lead hazard control work completed.

Research continues to indicate that the greatest lead risk to children is from the lead dust from deteriorated paint on window sills, sashes, jambs and wells (troughs). Correspondingly, the Public Health Department's lead hazard control activities continue to focus on windows in poor condition with deteriorated lead-based paint on their components. The use of this protocol continues to be very successful.

Funding to complete this lead hazard control work is provided by 50 percent HUD funds, 25 percent City of Saint Paul rehabilitation funds, and 25 percent property owner funds. Furthermore, HUD recently awarded a performance-based grant to Saint Paul-Ramsey County Public Health to continue this successful program. The City of Saint Paul has also pledged to try to provide their 25 percent

contribution to each project.

Lead Based Paint: Future Actions

An action plan was created to develop program procedures to address the HUD regulations on lead-based paint hazards in federally owned housing and housing receiving federal assistance. All changes have been implemented to ensure the following:

Rehabilitation Programs:

- Applications receive the required lead-based paint information and understand their responsibilities.
- Staff properly determined whether proposed projects are exempt from some or all lead-based paint requirements.
- The level of federal requirements assistance is properly calculated and the applicable lead-based paint requirements determined.
- Properly-qualified personnel perform risk assessments, paint testing, lead hazard reduction, and clearance services when required.
- Required lead hazard reduction work and protective measures are incorporated in project rehabilitation specifications.
- Risk assessment, paint testing, lead hazard reduction, and clearance works are performed in accordance with the applicable standards established in 24 CFR, Part 35, Subpart R.
- Required lead-based paint evaluation, presumption, and hazard reduction notices are provided to occupants and documented.
- Program documents establish the rental property owners' responsibility to perform and document ongoing lead-based paint maintenance activities, when applicable.
- Program staff monitors owner compliance with ongoing lead-based paint maintenance activities.

Home Ownership Programs:

- Applicants for home ownership assistance receive adequate information about lead-based paint requirements.
- Staff properly determines whether proposed projects are exempt from some or all lead -based paint requirements.
- A proper visual assessment is performed to identify deteriorated paint in the dwelling unit, common areas serving the unit, and building exterior surfaces.
- Prior to occupancy, properly qualified personnel perform paint stabilization and ensure that the dwelling unit passes a clearance exam in accordance with the standards established in 24 CFR, Part, 35, Subpart R.
- The home purchaser receives the required lead-based paint pamphlet and notices.
- If rehabilitation is involved, program staff will also need to ensure the applicable rehabilitation requirements are addressed.

Special Needs Program:

- Applicants for special needs housing assistance receive adequate information about lead-based paint requirements.
- Staff properly determines whether proposed projects are exempt from some or all lead -based paint requirements.
- A proper visual assessment is performed to identify deteriorated paint in the dwelling unit, common areas serving the unit, and building exterior surfaces.

- Prior to occupancy, properly-qualified personnel perform paint stabilization and ensure that the dwelling unit passes a clearance exam in accordance with the standards established in 24 CFR, Part, 35, Subpart R.
- Occupants receive the required lead-based paint pamphlet and notices.
- Required ongoing lead-based paint maintenance activities are incorporated into project operations if the assistance involves a continual relationship with HUD.
- If rehabilitation is involved, program staff will also need to ensure the applicable rehabilitation requirements are addressed.

Tenant Based Rental Assistance Programs:

- Rental assistance programs are administered by the Saint Paul Public Housing Agency and Metro HRA. These agencies have implemented the HUD regulation. A major focus is identifying deteriorated paint during the annual inspection of a property. These cited properties are referred to Saint Paul-Ramsey County Public Health for clearance testing following corrective actions. Safe lead abatement training is available to all property owners participating in the tenant based rental assistance programs.

§91.215 (h) Anti-Poverty Strategy

Saint Paul has a number of programs and policies which have the goal of reducing the number of poverty level families in the City. These programs complement the affordable housing programs being carried out by the City, and assist in providing a suitable living environment for residents.

The City of Saint Paul Workforce Development staff merged with Ramsey County Job Training staff in 2000, and became Workforce Solutions, the new County-City workforce development service provider. Ramsey County is the fiscal agent and administrator of the program, which provides services throughout Ramsey County, including Saint Paul. Workforce Solutions provides more than $18 million for dislocated worker services, welfare employment services, adult services, and youth services (CDBG funding is also provided for the summer Youth Employment Program). Workforce activities are guided by the Workforce Investment Board, and Workforce Solutions operates three One-Stop Workforce Centers, two of which are located in Saint Paul.

The City and some of its subgrantees, carry out a number of economic development activities throughout the City. Activities include financial assistance to businesses, commercial rehabilitation assistance, and improvements to commercial corridors. Many of the businesses assisted created jobs for low and moderate income City residents. The City also works with the Saint Paul Port Authority to reclaim underused, sometime polluted sites, and develops industrial parks which provide living wage jobs for residents of Saint Paul.

The City coordinates the Minority Business Development and Retention (MBDR) program, which has the goal to increase the number of small, minority and female-owned business enterprises participation in business opportunities generated by City housing and economic development activities. Program activities include entrepreneurial training, technical assistance, job training and development, and support for an overall 25 percent participation goal for small business enterprises that includes a 5 percent goal for minority business enterprises and 10 percent goal for women business enterprises on all certain City and HRA economic opportunities. MBDR also coordinates the Socially Responsible Investment Fund program, which promotes lending opportunities offered by local banks to its commercial corridors, small, minority and female-owned businesses, housing initiatives and community

development corporations.

The City also implements Section 3 of the Housing and Urban development Act of 1968 (12 U.S.C. 1701u) (as amended), which requires that economic opportunities generated by certain HUD financial assistance for housing and community development programs shall, to the greatest extent feasible, be directed to low and very- low income persons, particularly those who are recipients of government assistance for housing, and to businesses that provide economic opportunities for these persons. The types of economic opportunities available under Section 3 include: employment opportunities, training and educational opportunities, and contracts and business opportunities. The City's objective is to increase the participation of Section 3 eligible individuals and businesses in opportunities generated by HUD assistance by providing training, workshops, technical assistance and professional development.

Human/public service activities which provide assistance to City residents without the financial resources to meet their basic needs are provided primarily by Ramsey County. Services provided by the County include financial assistance through the Minnesota Family Investment Program, medical assistance, child care assistance, and food stamps. The City and its subgrantees provide additional services, which augment the work being done by the County. Health services, senior services, and employment training are all provided to low income City residents. All of these programs assist in helping or reducing the number of poverty level families in the City. Despite funding cuts from virtually all sources, the City will continue to provide funding to as many of these activities as possible, and to serve households living below the poverty level.

§91.215(i) Institutional Structure

Saint Paul's institutional structure provides a sound basis for achievement of the goals in the Consolidated Plan. Built upon established relationships, City staff consistently seeks out new partnerships between public, for-profit, and non-profit organizations. The development of increased affordable housing opportunities and meeting the City's community development needs relies on all the financial and human resource commitment of partners.

City/Public Agencies. Leadership in policy and program development is a primary role for the City. Utilizing the City's established resident participation mechanisms provides a sound basis for community involvement. Cultivating new community partnerships creates innovative opportunities for expanded community development.

The Saint Paul Planning Commission is a citizen body appointed by the Mayor and City Council. This group provides a lead role in proposing policy recommendations to the elected officials. The Commission provides reviews on a wide variety of issues, including housing and land use. City staff works extensively with the Planning Commission, neighborhood and community groups to revise components of the City's Comprehensive Plan, which includes neighborhood and small area plans, as well as land use and zoning studies. This work in turn provides a basis for much of the housing policy and direction included in the Consolidated Plan.

The Council of the City of Saint Paul and the Housing and Redevelopment Authority (HRA) are the key decisionmakers, having direct roles in the allocation of resources and development of housing and economic development programs.

The Department of Planning and Economic Development (PED) is the City government's primary housing

and economic development agency. PED staff administers housing and economic development programs, and handles all real estate transactions for the HRA. PED is responsible for encouraging non-profit and for-profit development and participation, and is the primary implementer of the City's HUD programs, including Community Development Block Grant, HOME, and Emergency Shelter Grants.

PED's Housing Team section includes the personnel and functions that coordinate the City's housing services and programs, and serve as the central point of contact for persons with housing needs. This section provides advice and assistance to low income persons with housing needs, including: mortgage foreclosure counseling, loans for first-time homebuyers as well as loans to finance the rehabilitation of owner-occupied housing units; assistance with emergency code enforcement and relocation needs; and referrals for technical and legal issues.

The City's focus and emphasis on housing related issues is overseen by PED's Housing Team Leader. This person directly oversees the City's housing policy, and provides overall coordination with public and private agencies on housing related issues. The Team Leader provides direction and oversight in the production of the City's adopted Annual Housing Action Plan.

The Saint Paul Public Housing Agency (PHA) is sole owner and provider of public affordable housing. The PHA was created by the Minnesota Legislature in 1977 to assume administration of subsidized housing programs and ownership of the public housing properties in Saint Paul. The PHA is an independent governmental unit. All business, including the hiring of personnel, contracting and procurement, and the provision of services is the sole responsibility of the PHA.

The PHA is funded by federal housing subsidies, rents paid by residents, special purpose grants, and investment revenues. It receives no financial support from City or County taxes, and makes a payment in lieu of taxes to defray the cost of City and County services. City staff, including the Department of Planning and Economic Development Director, Leadership Team, and Housing Team director work closely with PHA staff on mutual issues that affect neighborhood housing, assistance to clients, availability of scarce resources, and mutual program opportunities.

The PHA is governed by a Board of Commissioners. The seven commissioners are appointed by the Mayor and approved by the City Council. Two Commissioners represent public housing residents. The PHA regularly requests that the City review proposed developments, the PHA Comprehensive Plan and any proposed demolition or disposition of PHA properties.

The PHA owns and operates all of the City's public housing stock, administers the Section 8 Certificate and Voucher Program, and provides special housing and supportive service programs in conjunction with area service providers. The Saint Paul PHA has received multiple awards and national recognition as one of the premier public housing agencies in the nation. Unfortunately, like most large urban areas, demand for affordable housing exceeds supply. As a result, there is currently a lengthy waiting list for PHA housing availability.

The City's 17 District Councils represent the primary means for resident review and participation. Each organization has its own elected citizen boards that serve in an advisory capacity. Issues include review and recommendation of housing, economic development, public improvement, and other related programs and projects. The District Councils provide the framework for resident input on both neighborhood and citywide issues, and encourage participation of their residents in all relevant issues.

Minnesota Housing, the state's housing finance agency, offers a number of programs that assist in making housing affordable in Saint Paul. Home ownership, home improvement, multi-family development and rehabilitation, and capacity building programs are all offered by Minnesota Housing, and participated in by the City.

The U.S. Department of Housing and Urban Development (HUD) works with the City, and monitors the local use of federal housing funds. It also assists the City with the application of federal resources to meet identified local housing objectives.

For-Profit Organizations. The financial lending institutions, private real estate developers, and realtors will continue their involvement in promoting and development of affordable housing. Lending institutions provide first mortgage resources in tandem with City resources to build or rehabilitate affordable housing, provide first time home ownership opportunities, and provide economic development incentives that result in the creation of jobs. Their participation has been critical in many of the City's housing and economic development programs and projects. Private real estate developers also participate in the City's revitalization efforts, providing partnership opportunities with neighborhood based non-profit organizations in the creation of housing and small business commercial space. The Saint Paul Area Board of Realtors works closely with the City in promoting Saint Paul neighborhoods and regularly refers clients for neighborhood specific information. The Saint Paul - Minneapolis Home Tour is also an excellent example of how the City, neighborhood groups, lending institutions, and private business work together to promote our housing and economic development resources. In addition, LiveMsp.org is an initiative to celebrate city living and promote the neighborhoods of Minneapolis and Saint Paul as a premier housing choice, including the recruitment of new, as well as preservation of current residents in all of the cities' neighborhoods.

Non-Profit Organizations. The City of Saint Paul, by law, may not build housing with CDBG funds. The City, then, must rely on the non-profit sector to provide much of the initiative, direction, and direct project implementation in the development of affordable housing. Non-profits are also getting increasingly involved in the revitalization of neighborhood business strips. In both cases, non-profits are one of the major vehicles for the preservation of neighborhood vitality. Non-profit developers participate in locally based planning and production, as well as a variety of housing and related support services. Their proven track record has, in many instances, attracted the needed investment dollars from the private sector, thereby providing the needed link that produced successful collaborations.

The Family Housing Fund, Minnesota Housing, and the Local Initiatives Support Corporation (LISC) provide much needed resources and technical expertise to non-profit developers. Their efforts have assisted the City in achieving affordable housing gains, and the creation and/or expansion of small businesses, resulting in viable job opportunities.

Intergovernmental/Agency Coordination. The City of Saint Paul maintains a leadership role in bringing together units of local government from the entire Minneapolis-Saint Paul Metropolitan Area to share information, discuss needs, collaboration opportunities, and funding priorities. Participants included representatives from Saint Paul, Minneapolis, Ramsey County, Dakota County, Hennepin County, the Metropolitan Council, HUD staff, and other municipalities. This collaboration continues to be very helpful in identifying commonalities, and sharing community and housing development approaches. A significant initiative includes a collaboration to develop a metro-wide Analysis of Impediments to Fair Housing Choice. Meetings have been held over the past year, and have included both leading metro housing advocates and staff of the respective municipalities. This coalition will continue to work

together on mutual issues, and meet as a large group on an as needed basis.

Staff from the City of Saint Paul work with the City of Minneapolis CPED, Minnesota Housing, HUD, LISC, Federal Home Loan Bank of Des Moines, Enterprise Community Investment (ECI), National Equity Fund (NEF), and the Family Housing Fund as an interagency group to jointly review projects that need stabilization. The team works with property owners to develop specific plans, including financial restructuring, asset management, property management, and residential initiatives.

Through the legislative process, City officials continue to promote regional responsibility in addressing affordable housing needs, and supported legislation that addresses housing needs on a metro-wide basis.

Strengths and Gaps. Strengths in the current institutional structure are many. First, there is a focused responsibility on vacant and foreclosed housing issues more than at any time in recent history. The City and its multiple community partners are engaged in the *Invest Saint Paul* initiative, the federally-funded Neighborhood Stabilization Programs (phases 1 and 2), and are carrying out other activities funded through the ARRA (American Recovery and Reinvestment Act).

Secondly, there exists a diverse and highly experienced non-profit and for-profit development community that works effectively on an individual and cooperative basis. Third, Saint Paul has an extremely effective and competent Public Housing Agency, and sound public housing stock. Fourth, the City has a nationally recognized citizen participation process in place which provides a communication structure unequaled in the metropolitan area. Finally, and most importantly, there are established working relationships among all of these groups which can make the implementation of community development goals and plans a reality.

A dynamic strength of the City is the Department of Planning and Economic Development organization itself. By incorporating the City's planning, housing, and economic development components in one department, the City is able to respond quickly to opportunities, and to react comprehensively to multifaceted problems.

PED has, over the years, developed a positive track record for the administration and oversight of the City's most successful neighborhood programs. Included are: Housing 5000, the Citizen Participation Program, Sales Tax Revitalization (STAR) Program, Community Organization Partnership Program (COPP), Neighborhood Crime Prevention Program, and contracts with more than 100 neighborhood and community groups in the development of housing, economic development, and provision of human services.

Additionally, the City has a number of public review and oversight processes in place: City Council, HRA, Planning Commission, Capital Improvement Budget Committee, and the District Councils. These processes ensure that programs and projects conform to the City's adopted plans, goals and objectives.

What was a weakness in past Consolidated Plans was that the institutional structure did not adequately provide for a formalized inter-jurisdictional cooperation in assessing and meeting affordable housing needs. The weakness was addressed in the formation of the Mayor’s Housing Advisory Task Force. This group represented public and private agencies, for profit and not for profit developers, elected officials, and housing advocates across the spectrum. The Housing Advisory Task Force previously provided significant input into both the development and ongoing monitoring of City housing policy and related

issues. The dissolution of the Housing Advisory Task Force does not mean that important affordable housing discussions are not occurring in the city, however.

Ongoing, and possibly the greatest gap in the delivery system, continues to be the separation between the responsibilities for "bricks and mortar" activities and human services. While human service needs are traditionally met through Ramsey County and non-profit service providers, Saint Paul is expected to provide the bricks and mortar of infrastructure, economic development, and housing revitalization. Many housing needs, however, are intimately associated with human service needs, and cannot be segmented out, nor adequately met on an individual basis. Saint Paul is extremely concerned with regional housing issues, and how they impact the central cities. The City will continue to work with the surrounding jurisdictions to develop plans and procedures for approaching housing and economic development on a regional basis.

§91.215 (j) Coordination

The City of Saint Paul will continue to coordinate efforts between City departments, Ramsey County, the Saint Paul Port Authority, other local jurisdictions, the Metropolitan Council, the State of Minnesota, City subgrantees, neighborhood organizations, other local non-profits, local foundations, and the private sector to carry out housing and community development activities throughout the City. This coordination and the formation of partnerships have become increasingly important with the recent reductions in funding from virtually all sources. This type of coordination occurs in almost all projects and programs (including HUD funded activities), such as homeless activities, affordable housing activities, public services, economic development activities, and public improvement activities.

§91.215 (k) Public Housing Resident Initiatives

The Saint Paul Public Housing Agency (PHA) and the City of Saint Paul encourage public housing residents to become actively involved in their resident communities, and in the homeownership, training, and skills-building programs offered through social service organizations located at PHA community centers. The PHA also encourages residents to participate in their individual Resident Councils, whose roles are to improve quality of life and increase resident satisfaction, as well as advise and assist the PHA in various aspects of property management.

The PHA's Current Resident Initiatives include the following:

- **Home Ownership**. 283 families have bought their own homes through PHA's HOME program, after living in public housing or participating in the Section 8 Housing Choice Voucher Program. The HOME program is a joint project of the PHA, the City of Saint Paul, and the Family Housing Fund.

- **Resident Employment and Training Opportunities**. Several residents are employed as "Resident Initiatives Clerks" at the PHA's community centers. The centers proved offices and computer labs where community agencies offer a range of employment and training services as well as other supportive services for residents and the surrounding community. Both public housing residents and Section 8 Housing Choice Voucher participants are considered internal candidates in the hiring process for all PHA job openings. Twenty-eight percent of PHA employees are either current or former residents of public housing or Section 8-assisted housing.

- **Family Self-Sufficiency (FSS) Programs**. The PHA has two Family Self-Sufficiency (FSS) programs

which currently serve a total of 81 households, including 67 Section 8 Housing Choice Voucher participants and 14 public housing residents.

§91.215 (l) Performance Measurement

The City tracks the performance of each HUD funded activity it carries out, and reports the results to HUD and the public in the Consolidated Annual Performance and Evaluation Report (CAPER). Information is collected and reported for each HUD funded activity being carried out, and includes the number of persons/households assisted, racial and ethnic information, income level, and female headed household status of the persons/households assisted. The City also measures accomplishments of the specific HUD objectives in various tables in the Consolidated Plan and CAPER.

The City also measures the performance of activities by reviewing the progress of goals and objectives identified in contracts and work plans, as well as monitoring the timely expenditure and commitment of HUD funds.

§91.220 Action Plan

§91.220(b) Resources

(1) Federal Resources: The Federal Resources available from HUD for projects and programs identified in the 2010 Action Plan total $11,431,028. This includes $8,645,504 of Community Development Block Grant (CDBG), $2,434,542 of HOME Investment Partnership (HOME), and $350,982 of Emergency Shelter Grant (ESG) funding. The City will also use $404,496 of CDBG program income to fund the projects and programs identified in the Action Plan.

(2) Other Resources: In addition to the Federal Resources listed above, approximately $106 million of local, State, and other Federal funding will be available to the City for projects in 2010. This funding is primarily used for infrastructure and public improvements, and consists of approximately $34 million of local bonds, $55 million of other local financing, $9 million of State funds, and $8 million of Federal transportation funding. A breakdown of the types of activities being funded with the other resources identified in the 2010 Saint Paul Capital Improvement Budget is listed below.

Street/Bridge Improvements	45%
Sewer Improvements	14%
Parks Improvements	26%
STAR (Sales Tax) Program	15%

The City also plans to use Low Income Housing Tax Credits, HRA Funds, Tax Increment Financing, NSP I & II, and Federal Stimulus funds for housing and economic development activities during the program year.

§91.220(c) Annual Objectives

Below is a summary of specific annual objectives to be completed in the 2010-2014 period.

Fig. 48(a). Table 3A - Summary of Specific Annual Objectives

Availability/Accessibility of Decent Housing (DH-1)							
Specific Annual Objective		Source of Funds	Year	Performance Indicators	Expected Number	Actual Number	Percent Completed
DH 1.1	Address the need for availability of decent housing by assisting providers of homeless shelters	ESG	2010	People	3,500		%
			2011		3,500		%
			2012		3,500		%
			2013		3,500		%
			2014		3,500		%
			MULTI-YEAR GOAL		17,500		%
Affordability of Decent Housing (DH-2)							
DH 2.1	Address the need for affordability of decent housing by providing down payment assistance or gap financing for new housing.	CDBG/ HOME	2010	Housing Units	60		%
			2011		60		%
			2012		60		%
			2013		60		%
			2014		60		%
			MULTI-YEAR GOAL		300		%
Sustainability of Decent Housing (DH-3)							
DH 3.1	Address the need of sustaining decent housing by providing rehabilitation assistance to housing occupied by low/mod income households.	CDBG/ HOME	2010	Housing Units	305		%
			2011		305		%
			2012		305		%
			2013		305		%
			2014		305		%
			MULTI-YEAR GOAL		1,525		%
Availability/Accessibility of Suitable Living Environment (SL-1)							
SL 1.1	Improve the availability of a suitable living environment by funding public improvements	CDBG	2010	Public Facilities	1		%
			2011		1		%
			2012		1		%
			2013		1		%
			2014		1		%
			MULTI-YEAR GOAL		5		%
Affordability of Suitable Living Environment (SL-2)							
SL 2.1	Address the affordability of a suitable living environment by assisting public service providers serving low/mod persons	CDBG	2010	People	3,200		%
			2011		3,200		%
			2012		3,200		%
			2013		3,200		%
			2014		3,200		%
			MULTI-YEAR GOAL		16,000		%
Sustainability of Suitable Living Environment (SL-3)							

SL 3.1	Address the sustainability of a suitable living environment by providing funding for public information & crime prevention programs.	CDBG	2010 2011 2012 2013 2014	Organizations	20 20 20 20 20		% % % % %
SL 3.2	Address the sustainability of a suitable living environment by acquiring or demolishing substandard properties.	CDBG	MULTI-YEAR GOAL _____ 2010 Housing Units 2011 2012 2013 2014_____ **MULTI-YEAR GOAL**		100 _____ 20 20 20 20 20 100	_____	% _____ % % % %

Fig. 48(b). Table 3A - Summary of Specific Annual Objectives (continued)

Availability/Accessibility of Economic Opportunity (EO-1)							
Specific Annual Objective		**Source of Funds**	**Year**	**Performance Indicators**	**Expected Number**	**Actual Number**	**Percent Completed**
EO 1.1	Address the availability of economic opportunity by providing employment opportunities and training to City youth.	CDBG	2010 2011 2012 2013 2014	People	400 400 400 400 400		% % % % %
			MULTI-YEAR GOAL		2,000		%
Affordability of Economic Opportunity (EO-2)							
EO 2.1			2010 2011 2012 2013 2014				% % % % %
			MULTI-YEAR GOAL				%
Sustainability of Economic Opportunity (EO-3)							
EO 3.1	Address the sustainability of economic opportunity by assisting businesses with rehabilitation or economic development activities.	CDBG	2010 2011 2012 2013 2014	Businesses	7 7 8 7 7		% % % % %
			MULTI-YEAR GOAL		36		%
Neighborhood Revitalization (NR-1)							
NR 1.1			2010 2011 2012 2013 2014				% % % % %
			MULTI-YEAR GOAL				%
Other (O-1)							
O 1.1			2010 2011 2012 2013 2014				% % % % %
			MULTI-YEAR GOAL				%
Other (O-2)							

O 2.1			2010 2011 2012 2013 2014				% % % % %
			MULTI-YEAR GOAL				%

§91.220(d) Activities to be Undertaken in 2010

The **Consolidated Plan Listing of Projects (Tables 3C, or Figures 49)** on the following 33 pages provides a description and funding amount for each of the activities the City plans to undertake in HUD Fiscal Year 2010 with CDBG, HOME, ESG funding. Each project description (Table 3C) includes outcome measures for each activity (to address §91.220(e)).

The following activities, which are described in the Listing of Projects, address the City's Housing needs: ESG Program, East Side Revolving Loan Fund, Frogtown Facelift Home Rehabilitation Fund, Frogtown Flexible Fund, Home Improvement Lending Program, Home Improvements Plus, HOME Program, ISP Acquisition Fund, ISP Community Collaboration for Purchase/Rehab of Vacant Homes, ISP Housing Real Estate Fund, ISP Rehab fund for Owner Occupied Housing, North End/Hamline Midway Home Improvement, Property Management, and Sparc Acquisition/Rehab Fund.

The following activities, which are described in the Listing of Projects, address the City's economic development needs: Capitol Backyard Business Improvement Fund, Economic Development Loan Leverage Fund, ESNDC Business Investment Fund, and ISP Commercial Corridor & Citywide Economic Development.

The following activities, which are described in the Listing of Projects, address the City's public service needs: Block Nurse Program, Capital City Youth Employment, Citizen Participation, Crime Prevention, Neighborhood Health Clinics, and Neighborhood Non-Profit Organizations.

The Eileen Weida Play Area activity, described in the Listing of Projects, addresses the City's public facility needs.

The planning & environmental activity, described in the Listing of Projects, addresses the City's planning needs.

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Public Services

Project Title Block Nurse Program

Project Description
This multi-year program provides assistance to Block Nurse programs located throughout the City, which provide in home nursing services to area seniors. The programs receiving assistance are Como Park, Conway/Battle Creek, Hamline-Midway, Highland, Macalester-Groveland, Merriam Park, North End/South Como, Payne-Phalen, St. Anthony Park, Summit-University, Summit Hill, and West 7th. This program also receives local funding.

Objective Category: **X** Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility **X** Affordability Sustainability

Location: Community Wide

Objective Number CD 3, 4	**Project ID** 2	**Funding Sources:** CDBG 90,000 ESG HOME HOPWA Total Formula 90,000 Prior Years Funding Assisted Housing PHA Other Funding Total **90,000**
HUD Matrix Code 05A	**CDBG Citation** 570.201(e)	
Type of Recipient Subrecipient	**CDBG National Obj.** 570.208(a)(2)	
Start Date 06/01/10	**Completion Date** 05/31/11	
Performance Indicator People	**Annual Units** 250	
Local ID 00539	**Units Upon Completion** 250	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Public Services

Project Title Capital City Youth Employment

Project Description
This multi-year program provides economically disadvantaged City of Saint Paul youth with educational and employment opportunities. Income eligible youth are referred to this program by the Saint Paul School District and other community organizations. Services include remedial education, classroom and occupational skills training, and part-time employment.

Objective Category: Suitable Living Environment Decent Housing **X** Economic Opportunity

Outcome Category: **X** Availability/Accessibility Affordability Sustainability

Location: Community Wide

Objective Number CD 7	**Project ID** 4	**Funding Sources:** CDBG 400,000 ESG HOME HOPWA Total Formula 400,000 Prior Years Funding Assisted Housing PHA Other Funding Total **400,000**
HUD Matrix Code 05H	**CDBG Citation** 570.201(e)	
Type of Recipient Local Government	**CDBG National Obj.** 570.208(a)(2)	
Start Date 06/01/10	**Completion Date** 05/31/11	
Performance Indicator People	**Annual Units** 350	
Local ID 00464	**Units Upon Completion** 350	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Economic Development

Project Title Capitol Backyard Business Improvement Fund

Project Description
This program will provide commercial revitalization grants for building improvements to encourage private investment in commercial properties in the Frogtown, North End, South Como, and Hamline Midway neighborhoods. The program is being carried out by Greater Frogtown CDC and Sparc.

Objective Category: Suitable Living Environment Decent Housing **X** Economic Opportunity
Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Census tracts 304, 308, 312, 320, 321, 322, 323, 324, 325, 326, 327

Objective Number CD 10	Project ID 46	**Funding Sources:**
HUD Matrix Code 14E	CDBG Citation 570.202	CDBG 100,000 ESG HOME HOPWA
Type of Recipient Subrecipient	CDBG National Obj. 570.208(a)(1)	Total Formula 100,000 Prior Years Funding Assisted Housing
Start Date 06/01/10	Completion Date 12/31/11	PHA Other Funding
Performance Indicator Businesses	Annual Units 2	Total **100,000**
Local ID 00508	Units Upon Completion 3	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Public Services

Project Title Citizen Participation

Project Description
This multi-year program provides funding for District Councils in Planning Districts 2, 5, and 6. This program also receives local funding.

Objective Category: **X** Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Community Wide

Objective Number CD 6	**Project ID** 5	**Funding Sources:** CDBG 110,000 ESG HOME HOPWA Total Formula 110,000 Prior Years Funding Assisted Housing PHA Other Funding Total **110,000**
HUD Matrix Code 21C	**CDBG Citation** 570.206(b)	
Type of Recipient Subrecipient	**CDBG National Obj.** 570.208(a)(1)	
Start Date 06/01/10	**Completion Date** 05/31/11	
Performance Indicator Organizations	**Annual Units** 3	
Local ID 01374	**Units Upon Completion** 3	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Anti-Crime

Project Title Crime Prevention Program

Project Description
This multi-year program provides funding to neighborhood groups carrying out crime prevention activities. Activities include block club organizing, newsletter distribution, and community meetings. The organizations receiving funding are Districts 2-9, 11, 17, Lexington-Hamline, Youth Express, West Side Safe Neighborhoods, Ramsey Hill, University United, Aurora-St. Anthony, and Dayton's Bluff. This program also receives local funding.

Objective Category: **X** Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Community Wide

Objective Number CD 5	**Project ID** 10	**Funding Sources:** CDBG 300,000 ESG HOME HOPWA Total Formula 300,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 300,000**
HUD Matrix Code 05I	**CDBG Citation** 570.201(e)	
Type of Recipient Subrecipient	**CDBG National Obj.** 570.208(a)	
Start Date 06/01/10	**Completion Date** 05/31/11	
Performance Indicator People	**Annual Units** 150,000	
Local ID 01375	**Units Upon Completion** 150,000	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Planning & Administration

Project Title Direct Rehabilitation Administration

Project Description
Funding for direct activity delivery costs associated with the rehabilitation programs administered by the City.

Objective Category: Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability Sustainability

Location: Community Wide

Objective Number Housing 5	**Project ID** 11	**Funding Sources:** CDBG 200,000 ESG HOME HOPWA Total Formula 200,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 200,000**
HUD Matrix Code 14H	**CDBG Citation** 570.202	
Type of Recipient Local Government	**CDBG National Obj.** 570.208(a)(3)	
Start Date 06/01/10	**Completion Date** 05/31/11	
Performance Indicator N/A	**Annual Units** 0	
Local ID 00501	**Units Upon Completion** 0	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Housing

Project Title East Side Revolving Loan Fund

Project Description
This multi-year program provides loans or grants to low and moderate income home owners and townhome owners in Districts 4 and 5, who are unable to obtain financing from conventional sources. Applications are taken throughout the year, and assistance is provided on a first come - first serve basis. Eligible activities include rehabilitation, acquisition, demolition, relocation, and new construction of housing. Rates and terms of the loans are based on the applicants income. The program generates program income, and is being carried out by Dayton's Bluff NHS and East Side Neighborhood Development Company.

Objective Category: Suitable Living Environment **X** Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Census Tracts 309, 310, 311, 315, 316, 330, 331, 344, 345.

Objective Number Housing 5	**Project ID** 12	**Funding Sources:** CDBG 350,000 ESG HOME HOPWA Total Formula 350,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 350,000**
HUD Matrix Code 14A	**CDBG Citation** 570.202	
Type of Recipient Subrecipient	**CDBG National Obj.** 570.208(a)(3)	
Start Date 06/01/10	**Completion Date** 12/31/11	
Performance Indicator Housing Units	**Annual Units** 8	
Local ID 00388	**Units Upon Completion** 10	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Economic Development

Project Title Economic Development Loan Leverage Fund

Project Description
This multi-year program provides financing for small and medium sized businesses which will create new jobs or revitalize neighborhood commercial areas in the northeast area of the City. The funds may be used for acquisition, rehabilitation, working capital, equipment, or site improvements. The program offers loans for up to one half the project costs, with negotiated interest rates, on a first come – first serve basis. This program is being carried out by North East Neighborhoods Development Corporation.

Objective Category: Suitable Living Environment Decent Housing **X** Economic Opportunity

Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Census tracts 307.02, 307.03, 307.04, 317, 318.01, 318.02, 330, 346.01, 346.02, 347.01, 347.02.

Objective Number CD 10	**Project ID** 13	**Funding Sources:** CDBG 200,000 ESG HOME HOPWA Total Formula 200,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 200,000**
HUD Matrix Code 18A	**CDBG Citation** 570.203(b)	
Type of Recipient Subrecipient	**CDBG National Obj.** 570.208(a)(1)	
Start Date 06/01/10	**Completion Date** 12/31/11	
Performance Indicator Businesses	**Annual Units** 1	
Local ID 00509	**Units Upon Completion** 2	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Homeless

Project Title Emergency Shelter Grant Program

Project Description
The City will use Emergency Shelter Grant funding for homeless prevention, operating costs of shelters, essential services, improvements to homeless facilities, and ESG administration. The allocation process for ESG funds will occur in late summer or early fall, when an RFP will be published and sent to providers of homeless services. All applicants are required to provide a 1 to 1 match, which comes from foundations, the private sector, and State and local funds.

Objective Category: Suitable Living Environment **X** Decent Housing Economic Opportunity

Outcome Category: **X** Availability/Accessibility Affordability Sustainability

Location: Community Wide

Objective Number Housing 2 Homeless 1,4	**Project ID** 14	**Funding Sources:** CDBG ESG 350,982 HOME HOPWA Total Formula 350,982 Prior Years Funding Assisted Housing PHA Other Funding **Total 350,982**
HUD Matrix Code 03C	**CDBG Citation** 570.201(C)	
Type of Recipient Subrecipient	**CDBG National Obj.**	
Start Date 06/01/10	**Completion Date** 12/31/11	
Performance Indicator Persons	**Annual Units** 750	
Local ID	**Units Upon Completion** 1200	

The primary purpose of this project is to help: X The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Economic Development

Project Title ESNDC Business Investment Fund

Project Description
This multi-year program (previously entitled Payne-Arcade Commercial Improvements) provides funding for improvements to commercial properties on Payne Avenue or Arcade Street, between E. 7th Street and Ivy Avenue. The funding is in the form of forgivable and low interest loans, which are provided to businesses for highly visible rehabilitation or construction. The program is being carried out by East Side Neighborhood Development Company.

Objective Category: Suitable Living Environment Decent Housing **X** Economic Opportunity
Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Census tracts 310, 315, 331

Objective Number CD 10	Project ID 27	**Funding Sources:** CDBG 150,000 ESG HOME HOPWA Total Formula 150,000 Prior Years Funding Assisted Housing PHA Other Funding Total **150,000**
HUD Matrix Code 14E	CDBG Citation 570.202	
Type of Recipient Subrecipient	CDBG National Obj. 570.208(a)(1)	
Start Date 06/01/10	Completion Date 12/31/11	
Performance Indicator Businesses	Annual Units 3	
Local ID 00508	Units Upon Completion 5	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Public Facilities

Project Title Eileen Weida Play Area

Project Description
This project will provide funding for the replacement of play equipment and associated site improvements at the Eileen Weida Play Area.

Objective Category: **X** Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: **X** Availability/Accessibility Affordability Sustainability

Location: 637 Burr Street

Objective Number CD 1	**Project ID** 47	**Funding Sources:**
HUD Matrix Code 03F	**CDBG Citation** 570.201(c)	CDBG 266,000 ESG HOME HOPWA
Type of Recipient Local Government	**CDBG National Obj.** 570.208(a)(1)	Total Formula 266,000 Prior Years Funding Assisted Housing
Start Date 06/01/10	**Completion Date** 12/31/11	PHA Other Funding
Performance Indicator Public Facilities	**Annual Units** 1	**Total 266,000**
Local ID 01xxx	**Units Upon Completion** 1	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Planning & Administration

Project Title Finance Department

Project Description
Funding to pay City Finance Department costs associated with HUD grant programs.

Objective Category: Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability Sustainability

Location: N/A

Objective Number 86A	**Project ID** 15	**Funding Sources:** CDBG 18,000 ESG HOME HOPWA Total Formula 18,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 18,000**
HUD Matrix Code 21A	**CDBG Citation** 570.206	
Type of Recipient Local Government	**CDBG National Obj.**	
Start Date 06/01/10	**Completion Date** 05/31/11	
Performance Indicator N/A	**Annual Units**	
Local ID 00387	**Units Upon Completion**	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Housing

Project Title Frogtown Facelift Home Rehab Fund

Project Description
This multi-year program provides financing to low/moderate income property owners in the Frogtown area of Saint Paul who are unable to obtain rehabilitation financing through traditional sources. Up to $30,000 in the form of 1/3 forgivable loan, 1/3 amortized loan and 1/3 due on sale is available throughout the year on a first come - first serve basis for both interior and exterior health/safety and deferred maintenance improvements. This program generates program income, and is being carried out by Greater Frogtown CDC.

Objective Category: Suitable Living Environment **X** Decent Housing Economic Opportunity
Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Census Tracts 324, 325, 326, 327.

Objective Number Housing 5	**Project ID** 16	**Funding Sources:** CDBG 200,000 ESG HOME HOPWA Total Formula 200,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 200,000**
HUD Matrix Code 14A	**CDBG Citation** 570.202	
Type of Recipient Subrecipient	**CDBG National Obj.** 570.208(a)(3)	
Start Date 06/01/10	**Completion Date** 12/31/11	
Performance Indicator Housing Units	**Annual Units** 4	
Local ID 00661	**Units Upon Completion** 6	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Housing

Project Title Frogtown Flexible Fund for Housing Redevelopment

Project Description
This multi-year program, previously entitled New Construction Fund for Homeownership, provides funding to assist in the construction of housing on vacant lots or the rehabilitation of vacant housing located in District 7. Other activities may include acquisition, demolition, or relocation. Upon completion, the homes will be sold by realtors, or rented to low/moderate income households. This program is carried out by Greater Frogtown CDC.

Objective Category: Suitable Living Environment **X** Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility **X** Affordability Sustainability

Location: Census tracts 324, 325, 326, and 327.

Objective Number Housing 9	**Project ID** 17	**Funding Sources:** CDBG 100,000 ESG HOME HOPWA Total Formula 100,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 100,000**
HUD Matrix Code 12	**CDBG Citation** 570.204	
Type of Recipient Subrecipient	**CDBG National Obj.** 570.208(a)(3)	
Start Date 06/01/10	**Completion Date** 12/31/11	
Performance Indicator Housing Units	**Annual Units** 1	
Local ID 00662	**Units Upon Completion** 2	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Planning & Administration

Project Title General Administration

Project Description
Funding for the management, coordination, oversight, and monitoring of the CDBG program.

Objective Category: Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability Sustainability

Location: N/A

Objective Number N/A	**Project ID** 18	**Funding Sources:** CDBG 900,000 ESG HOME HOPWA Total Formula 900,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 900,000**
HUD Matrix Code 21A	**CDBG Citation** 570.206	
Type of Recipient Local Government	**CDBG National Obj.**	
Start Date 06/01/10	**Completion Date** 05/31/11	
Performance Indicator	**Annual Units**	
Local ID 00409	**Units Upon Completion**	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Housing

Project Title HOME Program

Project Description
The HOME Program funding will be used for CHDO development (minimum of 15%) and operating activities, City projects, administration (10% maximum), and subrecipient projects. Activities will include single family and multi-family rehabilitation and development, as well as homebuyer assistance. The homebuyer assistance projects will use the resale/recapture criteria being submitted to HUD with this plan. The HOME match requirement will be met with excess match from previous years, as well as match leveraged from new projects. Proposals for HOME funding are accepted throughout the year, and affirmative marketing is required for projects with 5 or more HOME units.

Objective Category: Suitable Living Environment **X** Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Community Wide

Objective Number Housing 5, 9	**Project ID** 20	**Funding Sources:** CDBG ESG HOME 2,434,542 HOPWA Total Formula 2,434,542 Prior Years Funding Assisted Housing PHA Other Funding **Total 2,434,542**
HUD Matrix Code 14A	**CDBG Citation** 570.202	
Type of Recipient Local Government	**CDBG National Obj.**	
Start Date 06/01/10	**Completion Date** 12/31/11	
Performance Indicator Housing Units	**Annual Units** 50	
Local ID 1-1994	**Units Upon Completion** 75	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Housing

Project Title Home Improvement Lending Program

Project Description
This multi-year program, previously entitled Community NHS Revolving Loan Fund, provides low interest home improvement loans with variable terms to low/moderate income homeowners. The funding is available on a first come - first serve basis, and is being carried out by Community NHS. The average loan amount is approximately $15,000, and this program generates program income.

Objective Category: Suitable Living Environment **X** Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Community Wide

Objective Number Housing 5	**Project ID** 19	**Funding Sources:** CDBG 200,000 ESG HOME HOPWA Total Formula 200,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 200,000**
HUD Matrix Code 14A	**CDBG Citation** 570.202	
Type of Recipient Subrecipient	**CDBG National Obj.** 570.208(a)(3)	
Start Date 06/01/10	**Completion Date** 12/31/11	
Performance Indicator Housing Units	**Annual Units** 6	
Local ID 00506	**Units Upon Completion** 10	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Housing

Project Title Home Improvement Plus

Project Description
This multi-year program provides deferred and low interest home improvement loans to low/moderate income homeowners on a first come - first serve basis, and acquisition of HIP mortgaged or vacant properties having a negative impact on the area. The program requires health and safety items be addressed before other improvements are allowed. The rehabilitation loans have variable terms, and average approximately $20,000. The program is carried out by North East Neighborhoods Development Corporation, and it generates program income.

Objective Category: Suitable Living Environment **X** Decent Housing Economic Opportunity
Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Census tracts 307.02, 307.03, 307.04, 317, 318.01, and 318.02.

Objective Number Housing 5	**Project ID** 21	**Funding Sources:** CDBG 150,000 ESG HOME HOPWA Total Formula 150,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 150,000**
HUD Matrix Code 14A	**CDBG Citation** 570.202	
Type of Recipient Subrecipient	**CDBG National Obj.** 570.208(a)(3)	
Start Date 06/01/10	**Completion Date** 12/01/11	
Performance Indicator Housing Units	**Annual Units** 6	
Local ID 00507	**Units Upon Completion** 8	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Planning & Administration

Project Title Housing Information Services

Project Description
This multi-year program provides funding for fair housing activities and counseling services to City residents.

Objective Category: Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability Sustainability

Location: Community Wide

Objective Number N/A	**Project ID** 22	**Funding Sources:** CDBG 100,000 ESG HOME HOPWA Total Formula 100,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 100,000**
HUD Matrix Code 21C	**CDBG Citation** 570.206	
Type of Recipient Local Government	**CDBG National Obj.**	
Start Date 06/01/10	**Completion Date** 05/31/11	
Performance Indicator	**Annual Units**	
Local ID 00405	**Units Upon Completion**	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Planning & Administration

Project Title Indirect Cost Plan

Project Description
Funding for costs included in the City's approved Indirect Cost Plan.

Objective Category: Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability Sustainability

Location: N/A

Objective Number N/A	**Project ID** 23	**Funding Sources:** CDBG 300,000 ESG HOME HOPWA Total Formula 300,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 300,000**
HUD Matrix Code 21B	**CDBG Citation** 570.206	
Type of Recipient Local Government	**CDBG National Obj.**	
Start Date 06/01/10	**Completion Date** 05/31/11	
Performance Indicator	**Annual Units**	
Local ID 00409	**Units Upon Completion**	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Housing

Project Title ISP - Acquisition Fund for Stabilizing Neighborhoods

Project Description
This multi-year program (previously entitled Neighborhood Revitalization Acquisition Fund) will provide funding for the acquisition of vacant properties which are primarily located in ISP areas, and related demolition and relocation costs. Substandard tructures will be cleared, and the sites will be redeveloped as low/moderate income housing, mixed use, or supportive use, or as neighborhood green space.

Objective Category: **X** Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Community Wide

Objective Number Housing 1, 2, 4, 6	**Project ID** 26	**Funding Sources:**	
HUD Matrix Code 01	**CDBG Citation** 570.201(a)	CDBG	684,000
Type of Recipient Local Government	**CDBG National Obj.** 570.208(a)(3)	ESG HOME HOPWA Total Formula	684,000
Start Date 06/01/10	**Completion Date** 12/31/11	Prior Years Funding Assisted Housing PHA	
Performance Indicator Housing Units	**Annual Units** 3	Other Funding	
Local ID 01022	**Units Upon Completion** 5	**Total**	**684,000**

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Economic Development

Project Title ISP: Commercial Corridor & Citywide Economic Dev.

Project Description
This multi-year program (previously entitled Capital City Business Development provides a flexible source of gap financing for businesses located in the City which have low/moderate income service areas or create jobs for low/moderate income persons. Funds will be targeted to key commercial corridors and development areas, including Invest Saint Paul areas and the Central Corridor. Activities include rehabilitation, acquisition, demolition, site preparation, development of commercial and mixed use buildings, and the provision of working capital and loan guarantees. Applications for this program are accepted year round. There are no minimum or maximum loan amounts, and the terms vary, based on the credit analysis of each project. Some projects funded through this program may use the job creation objective rather than the area benefit. This program will also receive local funding, leverage private investment, and generate program income.

Objective Category: Suitable Living Environment Decent Housing **X** Economic Opportunity

Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Community Wide

Objective Number CD 10	**Project ID** 3	**Funding Sources:**	
HUD Matrix Code 14E	**CDBG Citation** 570.202	CDBG	500,000
Type of Recipient Local Government	**CDBG National Obj.** 570.208(a)(1)	ESG HOME HOPWA Total Formula	500,000
Start Date 06/01/10	**Completion Date** 12/31/11	Prior Years Funding Assisted Housing PHA	
Performance Indicator Businesses	**Annual Units** 2	Other Funding	
Local ID 00519	**Units Upon Completion** 3	**Total**	**500,000**

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Housing

Project Title ISP: Community Collaboration for Purchase/Rehab of Vacant Homes

Project Description
This program, which is a collaboration between the City, Family Housing Fund, MHFA, and several neighborhood CDCs, provides funding to construct new housing or substantially rehabilitate vacant houses. The housing will primarily be located in the East Side, Frogtown, North End, and Summit-University neighborhoods, and will be listed by realtors for sale to low/moderate income households. Activities include acquisition, demolition, relocation, rehabilitation, and new construction.

Objective Category: Suitable Living Environment **X** Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility **X** Affordability Sustainability

Location: Community Wide

Objective Number Housing 9	**Project ID** 6	**Funding Sources:** CDBG 750,000 ESG HOME HOPWA Total Formula 750,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 750,000**
HUD Matrix Code 14G	**CDBG Citation** 570.202	
Type of Recipient Local Government	**CDBG National Obj.** 570.208(a)(3)	
Start Date 06/01/10	**Completion Date** 12/31/11	
Performance Indicator Housing Units	**Annual Units** 9	
Local ID 01019	**Units Upon Completion** 15	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Housing

Project Title ISP: Housing Real Estate Development Fund

Project Description
This multi-year program provides loans and grants to finance substantial multi-unit rehabilitation or development, including acquisition, demolition, and site preparation. Funding is available throughout the year on a first come-first serve basis to owners or developers of multi-unit properties. The amount of funding and terms vary, depending on the number of units and the type of improvements. Upon completion, the housing must be occupied by at least 51% low/moderate income households. This program also receives State and local funding, leverages private funding, and generates program income.

Objective Category: Suitable Living Environment **X** Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Community Wide

Objective Number Housing 5, 4	**Project ID** 9	**Funding Sources:** CDBG 500,000 ESG HOME HOPWA Total Formula 500,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 500,000**
HUD Matrix Code 14B	**CDBG Citation** 570.202	
Type of Recipient Local Government	**CDBG National Obj.** 570.208(a)(3)	
Start Date 06/01/10	**Completion Date** 12/01/11	
Performance Indicator Housing Units	**Annual Units** 20	
Local ID 00518	**Units Upon Completion** 20	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Housing

Project Title ISP: Rehabilitation Fund for Owner-occupied Housing

Project Description
This multi-year program (previously entitled Comprehensive Home Purchase & Rehab) provides a flexible source of financing to assist owner occupants of 1 to 4 unit properties. Due on sale loans are available on a first come-first serve basis for rehabilitation, hazardous materials removal, code enforcement, and energy efficiency improvements. The funding is available Citywide, but targeted to Invest Saint Paul areas. This program also receives State and local funding, and generates program income.

Objective Category: Suitable Living Environment **X** Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Community Wide

Objective Number Housing 5	**Project ID** 7	**Funding Sources:** CDBG 500,000 ESG HOME HOPWA Total Formula 500,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 500,000**
HUD Matrix Code 14A	**CDBG Citation** 570.202	
Type of Recipient Local Government	**CDBG National Obj.** 570.208(a)(3)	
Start Date 06/01/10	**Completion Date** 12/31/11	
Performance Indicator Housing Units	**Annual Units** 15	
Local ID 00418	**Units Upon Completion** 20	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Public Services

Project Title Neighborhood Health Clinics

Project Description
This multi-year program helps fund non-profit health clinics which provide medical and dental services to low/moderate income City residents. The participating clinics are Face to Face, Family Tree, Open Cities, and West Side. This program also receives local funding.

Objective Category: **X** Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility **X** Affordability Sustainability

Location: Community Wide

Objective Number CD3	**Project ID** 24	**Funding Sources:**	
HUD Matrix Code 05M	**CDBG Citation** 570.201(e)	CDBG	95,000
Type of Recipient Subrecipient	**CDBG National Obj.** 570.208(a)(2)	ESG HOME HOPWA Total Formula	95,000
Start Date 06/01/10	**Completion Date** 05/31/11	Prior Years Funding Assisted Housing PHA	
Performance Indicator People	**Annual Units** 2000	Other Funding	
Local ID 00522	**Units Upon Completion** 2000	**Total**	**95,000**

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Public Services

Project Title Neighborhood Nonprofit Organizations

Project Description
This multi-year program provides assistance to public service projects administered by nonprofit organizations throughout the City. Proposals are reviewed and approved for funding by the City Council. This program also receives local funding.

Objective Category: **X** Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility **X** Affordability Sustainability

Location: Community Wide

Objective Number CD 8	**Project ID** 25	**Funding Sources:** CDBG 305,000 ESG HOME HOPWA Total Formula 305,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 305,000**
HUD Matrix Code 05	**CDBG Citation** 570.201(e)	
Type of Recipient Subrecipient	**CDBG National Obj.** 570.208(a)(2)	
Start Date 06/01/10	**Completion Date** 09/01/11	
Performance Indicator People	**Annual Units** 1500	
Local ID 01376	**Units Upon Completion** 1500	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Housing

Project Title North End & Hamline Midway Home Improvement

Project Description
This program, previously entitled Sparc Deferred Loan Program, will provide home improvement grants to low/moderate income residents in the Hamline-Midway, North End, and South Como areas of Saint Paul. The assistance is available on a first come first serve basis. Program funding may be used for both interior health/safety and exterior improvements. This program is being carried out by Sparc.

Objective Category: Suitable Living Environment **X** Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Census Tracts 304, 308, 312, 320, 321, 322, 323

Objective Number Housing 5	**Project ID** 33	**Funding Sources:** CDBG 150,000 ESG HOME HOPWA Total Formula 150,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 150,000**
HUD Matrix Code 14A	**CDBG Citation** 570.202	
Type of Recipient Subrecipient	**CDBG National Obj.** 570.208(a)(3)	
Start Date 06/01/10	**Completion Date** 12/31/11	
Performance Indicator Housing Units	**Annual Units** 4	
Local ID 01379	**Units Upon Completion** 6	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Planning & Administration

Project Title Planning & Environmental

Project Description
Funding for planning activities in CDBG eligible areas of the City, as well as environmental and historic reviews of HUD funded projects.

Objective Category: Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability Sustainability

Location: N/A

Objective Number N/A	**Project ID** 29	**Funding Sources:** CDBG 300,000 ESG HOME HOPWA Total Formula 300,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 300,000**
HUD Matrix Code 20	**CDBG Citation** 570.205	
Type of Recipient Local Government	**CDBG National Obj.**	
Start Date 06/01/10	**Completion Date** 05/31/11	
Performance Indicator	**Annual Units**	
Local ID 00410	**Units Upon Completion**	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Housing

Project Title Property Management

Project Description
This multi-year project provides funding for the costs associated with maintaining properties acquired with HUD funding, including the maintenance, utilities, management and disposition expenses.

Objective Category: **X** Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Community Wide

Objective Number Housing 9	**Project ID** 30	**Funding Sources:** CDBG 375,000 ESG HOME HOPWA Total Formula 375,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 375,000**
HUD Matrix Code 02	**CDBG Citation** 570.201(b)	
Type of Recipient Local Government	**CDBG National Obj.** 570.208(a)(3)	
Start Date 06/01/10	**Completion Date** 05/31/11	
Performance Indicator Housing Units	**Annual Units** 1	
Local ID 00383	**Units Upon Completion**	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Housing

Project Title Sparc Acquisition and Rehabilitation Fund

Project Description
This program will help Sparc acquire and rehabilitate vacant homes in the Hamline-Midway, North End, and South Como areas of the City. The homes will then be sold to income eligible buyers. This program is carried out by Sparc.

Objective Category: Suitable Living Environment **X** Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility **X** Affordability Sustainability

Location: Census tracts 304, 308, 312, and 320, 321, 322, 323

Objective Number Housing 9	**Project ID** 45	**Funding Sources:** CDBG 100,000 ESG HOME HOPWA Total Formula 100,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 100,000**
HUD Matrix Code 14A	**CDBG Citation** 570.204	
Type of Recipient Subrecipient	**CDBG National Obj.** 570.208(a)(3)	
Start Date 06/01/10	**Completion Date** 12/31/11	
Performance Indicator Housing Units	**Annual Units** 1	
Local ID 01xxx	**Units Upon Completion** 2	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Other

Project Title Unspecified Contingency

Project Description
Funding to be used to increase the budget of approved CDBG activities needing additional funding, or to fund new CDBG activities.

Objective Category: Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability Sustainability

Location: Community Wide

Objective Number N/A	**Project ID** 31	**Funding Sources:** CDBG 157,000 ESG HOME HOPWA Total Formula 157,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 157,000**
HUD Matrix Code 22	**CDBG Citation**	
Type of Recipient Local Government	**CDBG National Obj.**	
Start Date 06/01/10	**Completion Date** 05/31/11	
Performance Indicator	**Annual Units**	
Local ID 00503	**Units Upon Completion**	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3

Consolidated Plan Listing of Projects

Applicant's Name City of Saint Paul, MN

Priority Need Other

Project Title Vacant & Hazardous Building Demolition

Project Description
This multi-year program provides funding for the demolition of vacant buildings which are considered nuisance properties, and pose a threat to public health and safety.

Objective Category: **X** Suitable Living Environment Decent Housing Economic Opportunity

Outcome Category: Availability/Accessibility Affordability **X** Sustainability

Location: Community Wide

Objective Number 86C	**Project ID** 32	**Funding Sources:** CDBG 500,000 ESG HOME HOPWA Total Formula 500,000 Prior Years Funding Assisted Housing PHA Other Funding **Total 500,000**
HUD Matrix Code 04	**CDBG Citation** 570.201(d)	
Type of Recipient Local Government	**CDBG National Obj.** 570.208(b)(2)	
Start Date 06/01/10	**Completion Date** 12/31/11	
Performance Indicator Housing Units	**Annual Units** 15	
Local ID 00461	**Units Upon Completion** 25	

The primary purpose of this project is to help: The Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

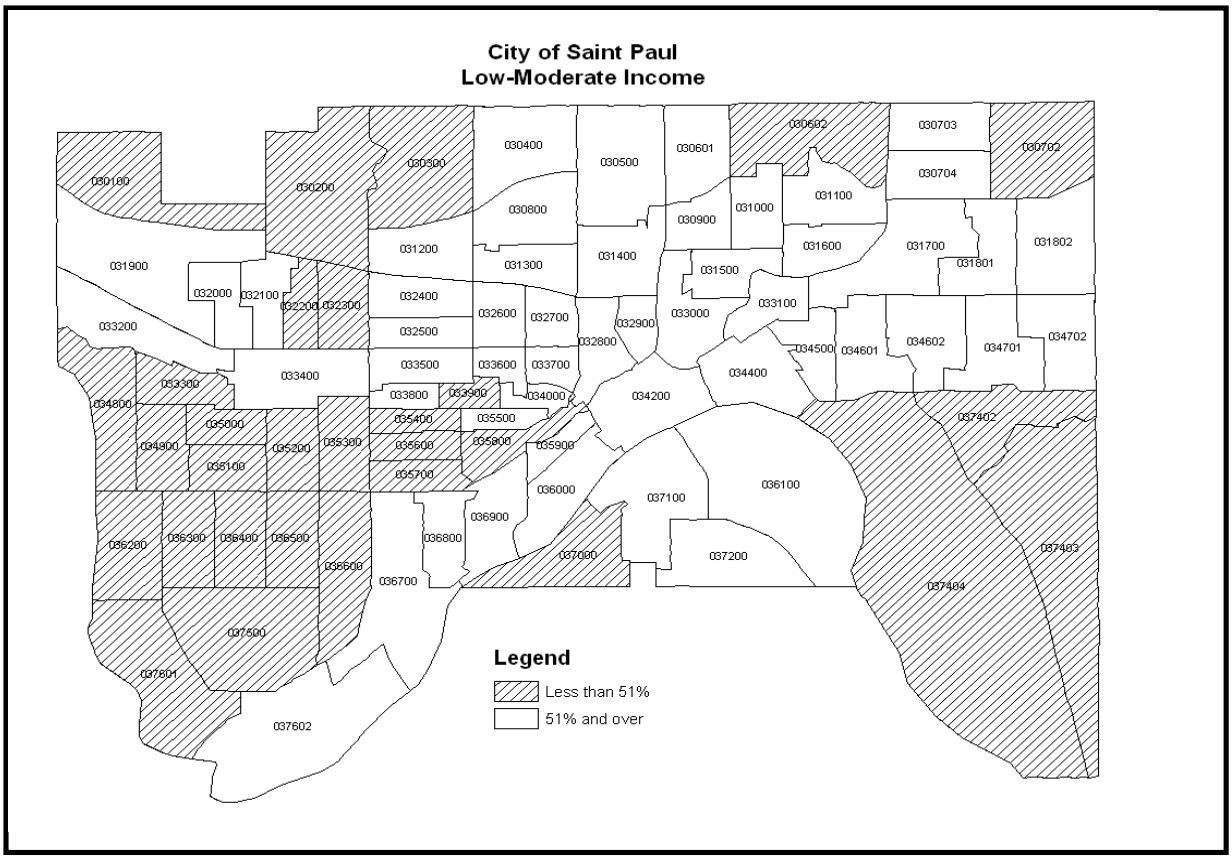
§91.220(f) Geographic Distribution

Eileen Weida Play Area, located at 637 Burr Street, is the only 2010 project with a specific location. All of the other projects and programs described in the Action Plan are available citywide, or have service areas that include one or more neighborhoods (districts) in the City. The specific locations are identified on the individual project sheets in the Consolidated Plan Listing of Projects, immediately preceding this section.

A map which shows the area of the City with at least 51 percent low/moderate income persons is below. All of the activities being carried out in 2010 which provide an area benefit will have a service area that is primarily located in the un-striped area of the map.

Activities carried out by the City which provide a direct benefit (primarily housing activities) are available citywide to income eligible households, while direct benefit activities carried out by subgrantees are available to income eligible households located in the neighborhoods served by the subgrantee. Both the City and subgrantees will also target their funds to Invest Saint Paul (ISP) areas of the City, which are the areas that have been hit hardest by the foreclosure crisis. NSP I and II funds are also being targeted to these areas.

Fig. 50. Saint Paul Census Tracts where at least 51 percent of the population is low/moderate income



§91.220(g) Affordable Housing Goals

In 2010, the number of homeless, non-homeless, and special needs households to be provided affordable housing units through funds made available to Saint Paul is 2. In 2010, the number of households to be provided affordable housing units using funds made available to Saint Paul through the production of new units is 6, and the number of households to be provided affordable housing through the rehabilitation of existing units is 118. No households will be provided with rental assistance using funds made available to Saint Paul in 2010.

Fig. 51. Annual Housing Completion Goals

Grantee Name: City of Saint Paul, MN **Program Year: 2010**	**Expected Annual Number of Units To Be Completed**	**Actual Annual Number of Units Completed**	***Resources used during the period***			
			CDBG	**HOME**	**ESG**	**HOPWA**
ANNUAL AFFORDABLE HOUSING GOALS (SEC. 215)						
Homeless households	2		X	X	☐	☐
Non-homeless households	122		X	X	☐	☐
Special needs households	2		X	X	☐	☐
ANNUAL AFFORDABLE RENTAL HOUSING GOALS (SEC. 215)						
Acquisition of existing units			☐	☐		☐
Production of new units			☐	☐		☐
Rehabilitation of existing units	45		X	X	☐	☐
Rental Assistance			☐	☐		☐
Total Sec. 215 Affordable Rental	45		X	X	☐	☐
ANNUAL AFFORDABLE OWNER HOUSING GOALS (SEC. 215)						
Acquisition of existing units			☐	☐		
Production of new units	6		X	X		
Rehabilitation of existing units	73		X	X		
Homebuyer Assistance	2		☐	X		☐
Total Sec. 215 Affordable Owner	81		X	X	☐	☐
ANNUAL AFFORDABLE HOUSING GOALS (SEC. 215)						
Acquisition of existing units			☐	☐		☐
Production of new units	6		X	X		☐
Rehabilitation of existing units	118		X	X	☐	☐
Homebuyer Assistance	2		☐	X		☐
Total Sec. 215 Affordable Housing	126		X	X	☐	☐

ANNUAL HOUSING GOALS						
Annual Rental Housing Goal	45		X	X	☐	☐
Annual Owner Housing Goal	81		X	X	☐	☐
Total Annual Housing Goal	126		X	X	☐	☐

§91.220(h) Public Housing

Section §91.220(j) below includes a discussion of proposed actions that address public housing and improvements, resident initiatives. The Saint Paul Public Housing Agency is not troubled, so the requirement to address this does not apply.

§91.220(i) Homeless & Other Special Needs

During 2010-2014, the City will proactively implement many housing strategies to assist homeless individuals, homeless families, and homeless unaccompanied youth, as follows:

Emergency Shelter Grant. The City will continue to allocate its Emergency Shelter Grant funds to partially fund the operations of agencies that provide homeless prevention services, emergency shelters, transitional housing, and outreach social services to assist homeless individuals and homeless families. The City may partner Ramsey County and other social service agencies on proposals that increase the number of shelter beds, especially shelter beds for homeless youth, if funding is available. Saint Paul will continue to allocate ESG funding for operating funds. The ESG funds are awarded on a competitive basis, with the proposals reviewed by the City, Ramsey County, area foundations, and service providers. Each proposal is rated and ranked, before being recommended to the Mayor and City Council for final approval.

Homelessness Prevention and Rapid Re-Housing. Under the American Recovery and Reinvestment Act, Saint Paul is administering the Homelessness Prevention and Rapid Re-Housing Program (HPRP) for homeless individuals, homeless families, and homeless youth. Saint Paul is partnering with Ramsey County to create a more comprehensive homelessness prevention delivery service, including leveraging HPRP funds with state homelessness prevention funds (FHPAP) to serve more residents-in-need. During 2009-2012, Saint Paul will implement homelessness prevention initiatives to successfully prevent people at risk from becoming homeless and rapidly re-house emergency shelter users to more housing. HPRP targets low-income households who are most in need of temporary assistance and most likely will secure stable housing after HPRP concludes. Eligible HPRP activities may include: rental assistance, housing relocation services, housing stabilization services, including case management, housing search, housing placement, and other support services for people at risk of being homeless or living in emergency shelters, drop-in centers, and on the streets; family reunification for homeless unaccompanied youth under age of 22; assistance to New American refugees, and assistance to homeless veterans. In addition to other HPRP activities, Saint Paul's priorities include: assist low income renters in foreclosed buildings; legal services to assist tenants to retain housing; and additional County Emergency Assistance staff so HPRP participants can better access Emergency Assistance funds.

CDBG/HOME. Saint Paul will continue to use CDBG and HOME funds, as appropriate to construct or preserve housing affordable to low and moderate income residents, including developing supportive housing.

CDBG – Program funds. CDBG will also be used for the Block Nurse, Health Clinic, and Neighborhood Non-Profit programs, which provide assistance for persons with special needs.

Low Income Housing Tax Credits. Saint Paul will continue to use CDBG and HOME funds, as appropriate to construct or preserve housing affordable to low and moderate income residents, including developing supportive housing.

§91.220(j) Other Actions

Foster and maintain affordable housing. In 2010 the City will continue to use a large portion of its CDBG funding, and all of its HOME and ESG funding for affordable housing activities. Projects and programs which provide assistance for homebuyers, homeowner rehabilitation, rental rehabilitation, and new construction of affordable housing will be carried out by the City and subgrantees. Descriptions of the specific projects and programs can be found in the Consolidated Plan Listing of Projects (Table 3) in this section of the Consolidated Plan. In addition to the HUD funded activities identified in this document, the City will also carry out projects with other local, State, and other Federal funds, as well as tax credits.

Public Housing improvements and resident initiatives. In 2010, the Saint Paul Public Housing Agency and the City of Saint Paul will continue to encourage public housing residents to become actively involved in their resident communities, and in the homeownership, training, and skills-building programs offered through social service organizations located at PHA community centers. The PHA will also encourage residents to participate in their individual Resident Councils, whose roles are to improve quality of life and increase resident satisfaction, as well as advise and assist the PHA in various aspects of property management.

Evaluation and reduction of lead-based paint hazards. Saint Paul will continue to comply with the HUD regulations concerning lead based paint, including notifying applicants of the lead requirements, performing lead screening, requiring abatement by certified workers, and completing clearance testing on all HUD-funded housing projects. The City will also provide assistance to Ramsey County for the lead window replacement program.

Anti-poverty strategy. The City will provide funding for workforce development activities and related public service activities, which augment the programs funded by Ramsey County. The workforce activities include outreach to participants, participant assessment, basic skills training, job training, job placement, work experience, and follow up. The City and some of its subgrantees have a number of programs that provide assistance to businesses, which may create jobs for low/moderate income persons.

The City will also implement Section 3 of the Housing and Urban development Act of 1968 (12 U.S.C. 1701u) (as amended), which requires that economic opportunities generated by certain HUD financial assistance for housing and community development programs shall, to the greatest extent feasible, be directed to low and very- low income persons, particularly those who are recipients of government assistance for housing, and to businesses that provide economic opportunities for these persons. The types of economic opportunities available under Section 3 include: employment opportunities, training and educational opportunities, and contracts and business opportunities. The City's objective is to increase the participation of Section 3 eligible individuals and businesses in opportunities generated by HUD assistance by providing training, workshops, technical assistance and professional development.

Developing institutional structures and enhancing coordination between housing and service agencies. Saint Paul continues to work closely with Ramsey County (the primary public service provider in the City), and the Saint Paul Public Housing Agency (the administrator of public housing and vouchers in Saint Paul). The City will continue to partner with the Saint Paul Port Authority on commercial and industrial projects which produce meaningful living wage jobs, and enhance the tax base; and with adjacent units of government on issues such as the regional Analysis of Impediments to Fair Housing Choice. The City will also continue to work with our neighborhood community development corporations, other non-profit organizations in the City, and the private sector to deliver housing and community development services.

§91.220(k) Program Specific Requirements

Information about a project's compliance with the specific requirements of the CDBG and HOME programs can be found on the individual project sheets (Tables 3C).

§91.230 Monitoring

The City takes a number of steps to help ensure that all activities carried out with HUD funding are in compliance with program regulations, and also meet their intended goals, including timely expenditure of funds. Listed below are the major components of the City's ongoing monitoring system.

Review of Proposals. All projects and programs proposed to receive HUD funding are reviewed by staff to determine if the activity is eligible, and if a national objective will be met.

Contracts. All non-City entities receiving CDBG, HOME, or ESG funding are required to enter into a formal agreement with the City. This agreement identifies all applicable federal, state, and local regulations and compliance requirements that apply to the activity. The agreement also identifies specific activities to be carried out, a timeline for carrying out the activities, and a detailed budget.

Reimbursement and Check Requests. Each time a reimbursement is requested for either a City or subgrantee administered activity, documentation of the expenses, as well as a report which updates the progress and accomplishments of the activity must be included. The reimbursement requests are reviewed for accuracy by the City project manager and accounting staff before the reimbursements are made.

On-Site Monitoring. Each year the City makes site visits to subgrantees carrying out federally funded projects and programs. Selection of subgrantees is based on risk factors, including the amount of funding allocated, the complexity of the project or program being carried out, and the experience and capacity of the group receiving the funding. The on-site monitoring examines the subgrantees financial systems and controls, cost reasonableness of activities, income eligibility of participants, project progress, and other applicable requirements. In accordance with HOME regulations, all HOME funded programs are reviewed each year, and HOME assisted properties with long term compliance requirements are inspected as prescribed.

Reporting. The City prepares a Consolidated Annual Performance and Evaluation Report (CAPER) for submission to HUD each year. The CAPER details the progress and accomplishments of CDBG, HOME, and ESG funded activities. Information contained in the CAPER is taken from report forms submitted

each time a project or program receives a reimbursement, which allows the City to track the progress of activities being carried out on an on-going basis. The City also makes updates to the HUD reporting system (IDIS) throughout the year.

Appendices (attached separately)

Letter from Mayor Christopher Coleman
Federal SF424 Application Forms
HOME Resale – Recapture Guidelines
Program Certifications
City Council Resolution