

## Executive Summary

### ES-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

#### 1. Introduction

This document is the 2025-2029 Consolidated Plan for the City of Saint Paul, Minnesota, to be submitted to the U.S. Department of Housing and Urban Development (HUD). The Consolidated Plan describes the City's housing market conditions, identifies the need for affordable housing and community development, and provides strategies to address these needs for a period of five years. The Plan coordinates the City's housing and economic development plans with other public, private and non-profit community housing providers, and non-housing service agencies to identify priorities that align and focus funding from the HUD formula block grant programs: Community Development Block Grant (CDBG) Program, HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) Program.

The one-year Annual Action Plan (AAP) for 2025 program year is also included in this document. The AAP includes the City's application for 2025 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 funds to assist in the provision of long-term, safe and affordable housing, and ESG funding to support programs that assist individuals and families to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness.

Saint Paul is considered an entitlement community by HUD. Eligibility for participation as an entitlement community is based on population data provided by the U.S. Census Bureau and metropolitan area delineations published by the Office of Management and Budget. HUD determines the amount of each entitlement grantee's annual funding allocation formula, which uses several objective measures of community needs including the extent of poverty, population, housing overcrowding, age of housing, and population trends in relation to other metropolitan areas.

The City expects to receive funding allocations in 2025 similar to its 2024 allocations: \$6,765,326 in CDBG funding, \$1,534,711 in HOME funding, and \$591,281 in ESG funding. In addition, the City estimates using about \$235,000 in CDBG program income and approximately \$206,000 in HOME program income. Program income is directly generated from a CDBG or HOME program

funded activity, such as loan repayments. Because the federal budget allocations for 2025 are not yet passed upon drafting this Plan, the City has a contingency plan for different funding amounts. Should the City receive an amount higher or lower than the estimates from last program year, all activities will be adjusted in direct proportion to the difference in actual allocations, and estimated Program Income may adjust. This document will be submitted to HUD by April 15, 2025, which is forty-five days before the City's June 1, 2025, program year begins. However, if the 2025 budget is delayed, that submission will be delayed until known allocations are provided by HUD.

## **2. Objectives & outcomes identified in the Plan Needs Assessment Overview**

Through the needs assessment and market analysis, citizen participation process, and agency consultation during the development of this Plan, the City of Saint Paul has identified priority needs in the Strategic Plan. These priorities include:

- Preservation of existing affordable housing;
- Development of new affordable housing;
- Support stable, affordable, and well-maintained homeownership;
- Emergency shelters, unsheltered prevention and support services;
- Public services, including tenant and landlord education;
- Fair housing and housing anti-discrimination efforts;
- Pre-development support, including lead-based paint abatement, acquisition, demolition, and clearance of property;
- Improve public infrastructure, city facilities, and community spaces;
- Economic development and job growth;
- Community outreach and engagement;
- Community planning needs;

The City of Saint Paul will allow, but not require, owners of HOME-funded housing developments to limit the beneficiaries or give preferences to segments of the low-income population. This includes limiting units or giving preferences to the following low-income population segments: elderly and/or disabled, victims of domestic violence, and chronically homeless.

## **3. Evaluation of past performance**

The City continues to seek expanded economic opportunities that benefit its low-and moderate-income

citizens, preserve and create decent and affordable housing opportunities, address the needs faced by those who are homeless or are threatened with homelessness, provide accessible public services for vulnerable populations, affirmatively further fair housing, and leverage its federal HUD funding with other funds to make significant, sustainable change in the community. Since the COVID-19 pandemic, economic and social impacts have been felt in myriad ways by residents of Saint Paul, but the effects have been especially hard on marginalized and less stable residents. The need for affordable housing and related services has not lessened in recent years, making these HUD dollars even more important.

During the 2023-2024 program year, the City and its partners provided housing assistance to 101 households through CDBG-funded activities. For these households: 46 were white, 15 were Black/African American, 31 were Asian, and 11 identified as a mixed-race household, 11 households identified as Hispanic, and 30 were female-headed households. The City also worked with three community development organizations to assist low- to moderate-income (LMI) homeowners with housing rehabilitation, and three community development organizations to assist with economic development activities in low- to moderate-income areas (LMA) and with job creation and retention efforts for serve LMI residents.

Housing programs administered by the City were available citywide to income-eligible households. The City provided funding to sub-grantees, whose programs were available to income-eligible residents residing in the sub-grantee's service areas: Districts 1 through 8, 11, and 17.

During the 2023-2024 program year, the City's ESG program funded eligible activities for 1,545 people in the form of homelessness prevention, emergency shelter operations, street outreach, rapid re-housing services, data collection, and ESG program administration.

#### **4. Summary of citizen participation process and consultation process**

Throughout the development of the Consolidated Plan, interested individuals, local and regional organizations, and government agencies were encouraged to contribute information, ideas, opinions, and suggested priorities for improving community public facilities, increasing affordable housing, creating job and business opportunities, and enhancing public services.

Many opportunities were available to residents to provide input for the Plan, including Safe Summer Nights community outreach events on August 1 and 15, where City staff gathered input through conversations and polls, and shared information on the Consolidated Plan and opportunities for public input. Additionally, opportunities for public input were available at two public meetings dedicated to collecting input on the Consolidated Plan, presentations and discussions at District Council meetings, consultation with the City's CIB Committee, and an online engagement survey for both local organizations and residents.

The City consulted with a diverse array of public, non-profit and private sector organizations via phone, email, online survey, and face-to-face interviews. The following groups were invited to participate in the process:

- City of Saint Paul Departments

## DRAFT

- City of Saint Paul Capital Improvement Budget (CIB) Committee
- Saint Paul District Councils
- Saint Paul Business Associations and Chambers of Commerce
- Saint Paul Community Development Corporations
- Saint Paul Public Housing Agency
- Ramsey County Community and Economic Development
- Ramsey County Continuum of Care
- Saint Paul-Ramsey County Public Health
- Capitol Region Watershed District
- Local and regional social service organizations

These groups represent a range of interests including:

- Saint Paul residents (including cultural communities)
- Affordable housing providers
- Economic development organizations
- Local government offices
- Fair housing service providers
- Victim services
- Homeless shelters and providers
- Providers for elimination of lead-based paint hazards
- Health and human service providers, including those focusing on elderly, veterans, homelessness, and persons with disabilities and mental illness
- Organizations working to narrow the digital divide and increase internet access
- Management of flood prone areas, public land, or water resources

The public comment period for this document is March 10 through April 9, 2025. Notification of the availability of the draft document was sent out through the City's Early Notification System (ENS) and a public notice was published in the *Pioneer Press*. The notice included information for persons needing special accommodations and assistance for non-English speaking residents. The document is made available for review at the Department of Planning and Economic Development, on its website, and at the Saint Paul Public Library Bookmobile. Saint Paul public libraries do not require a library card to access public library computers. The City held a public hearing on March 27<sup>th</sup> at the Sun Ray Public Library. No comments were received during the public comment period [or *Public comments received are included in Attachment F*].

## 5. Summary of public comments

A summary of the comments received during the CIB public hearing held on August 12, 2024, at Rondo Community Library is included in Attachment A.

The public comment period for this 2025-2029 Consolidated Plan was March 10 through April 9, 2025, and a public hearing was held on March 27<sup>th</sup> at the Sun Ray Public Library. No comments were received at the public hearing or during the public comment period [*or Public comments received are included in Attachment F*].

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

The public comment period for this document was March 10 through April 9, 2020. No comments were received [*or Public comments received at this meeting are included in Attachment F*].

## **7. Summary**

The Consolidated Plan describes the City's housing market conditions, identifies the need for affordable housing and community development, and provides strategies to address these needs for a period of five years. The plan coordinates the City's housing and economic development plans with other public, private, and non-profit community housing providers, and non-housing service agencies.

Developing the Consolidated Plan included gathering input and data from residents, local and regional organizations, and government agencies through a citizen participation and agency consultation process. Opportunities available to residents included voting activities at City-sponsored events, engagement and commenting at public meetings, discussions at District Council meetings, and an online survey available in 5 languages with paper copies available at all local libraries. In addition, the City consulted with a diverse array of public, non-profit, and private sector organizations via phone, email, online survey, and face-to-face interviews.

Through the Plan's needs assessment, market analysis, and citizen participation and consultation process, the City identified priority needs as well as strategies to address those needs. The resulting Consolidated Plan and subsequent Annual Action Plan provide a unified vision of services, activities, and initiatives designed to improve the quality of life for Saint Paul residents by providing affordable housing construction and rehabilitation, public services, revitalized neighborhoods, support for homeless and special needs populations, elimination of blight, and the expansion of economic development opportunities for communities and businesses.

## The Process

### PR-05 Lead & Responsible Agencies 24 CFR 91.200(b)

**1. Describe agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	City of ST. Paul	Planning and Economic Development
HOME Administrator	City of ST. Paul	Planning and Economic Development
ESG Administrator	City of ST. Paul	Planning and Economic Development

**Table 1 – Responsible Agencies**

### Narrative

The Department of Planning and Economic Development (PED) of the City of Saint Paul was established in 1977, and is responsible for the planning, housing, and economic development activities throughout the city. PED’s mission is to build community wealth through business, housing, jobs, planning, and financial and cultural assets. The City’s Housing and Redevelopment Authority (HRA) is a legally distinct public entity which undertakes housing, commercial, and business development activities through property acquisition, housing development, real estate finance, and business loans.

PED has 81 full-time employees that work on our four department teams – Administration & Finance, Economic Development, Housing, and Planning (which includes Heritage Preservation and Zoning). The 2025 adopted PED operations admin. budget is \$15.4 million and the 2025 adopted total HRA budget is \$49.6 million.

PED finances affordable housing development, offers home rehabilitation lending and mortgage foreclosure prevention programs to residents, emergency shelter grant programs, tax increment and bond financing, and manages \$62.8 million of parking assets (net of depreciation). The Economic Development division within PED implements economic

development strategies including promoting commercial corridors, business retention and recruitment, and small business lending.

**Consolidated Plan Public Contact Information**

- Jessica Deegan, Grants Compliance Manager – 651-266-6644 or [Jessica.deegan@ci.stpaul.mn.us](mailto:Jessica.deegan@ci.stpaul.mn.us)
- Nellie Jerome, Consolidated Plan Project Lead – 651-266-6648 or [Nellie.Jerome@ci.stpaul.mn.us](mailto:Nellie.Jerome@ci.stpaul.mn.us)

Written comments should be sent to the following address:

City of Saint Paul, Planning and Economic Development  
Attn: Nellie Jerome  
City Hall Annex, Suite 1400  
25 West 4th street  
Saint Paul, MN 55102

## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

### **1. Introduction**

The City of Saint Paul consulted with numerous organizations, local government agencies, and City departments throughout the Consolidated Plan process. The City held two public hearing meetings and requested information via phone, e-mail, online and paper surveys, and face-to-face interviews with organizations.

The City's Housing staff consults with the Saint Paul Public Housing Agency (PHA), Minnesota Housing Finance Agency (MHFA), Ramsey County, community housing development corporations, for-profit and non-profit housing developers, and organizations and institutions that provide resources to finance, construct, and preserve affordable housing citywide. The City annually provides opportunities for public input on spending priorities through the Capital Improvement Budget (CIB) and overall City budget. A public hearing on the proposed CIB budget was held on August 12, 2024, at the Rondo Community Library. The CIB committee heard public testimony regarding preliminary recommendations for funding of Community Proposals for 2024 and for 2025 capital improvement funds. The CIB Committee is an advisory body of 18 Saint Paul residents that recommends projects and funding levels to the Mayor every year by June 30. Meeting minutes, including public comments received on the CIB funding proposals, are included in Attachment A.

The City's Emergency Solutions Grant (ESG) funds are allocated to programs that 1) promote a comprehensive delivery of homeless services; 2) assist underserved communities; 3) provide services as needed to achieve the goals of the CoC, Ramsey County Family Homeless Prevention and Assistance Program (FHPAP), and ESG; and 4) address City concerns while meeting HUD's national housing objectives.

### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I)).**

The City's Housing staff consults with Ramsey County, Ramsey County Continuum of Care (CoC), Saint Paul PHA, community housing development organizations/community development corporations (CHDOs/CDCs), and housing developers to ensure residents have access to quality affordable housing citywide. The City's ESG grant is administered in coordination with Ramsey County Housing Stability Department, whose staff plays a pivotal role in Heading Home Ramsey (HHR), CoC, leadership, data, and evaluation support staff, and nongovernmental homeless services providers.

The County leads in developing activities to enhance coordination of public/assisted housing providers, health care and social service providers from all sectors (public, private, and non-profits) by actively recruiting new HHR members, engaging providers in identifying service gaps, and developing strategic priorities to fill these gaps.

The Saint Paul Police Department supports the City's vision of a community-first public safety approach through the assignment of Behavioral Health Liaisons. These liaisons are comprised of sworn police officers who refer information concerning vulnerable populations to County and State mental health resources. The goal of the Behavioral Health Liaisons is to connect vulnerable or underrepresented persons with resources to support long-term stabilization and to reduce interactions with the criminal justice system.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness**

The City continues its current Joint Powers Agreement with Ramsey County, through August 2026, to allocate its ESG funds for programs that 1) promote a comprehensive delivery of homeless services; 2) assist underserved communities; 3) provide services as needed to achieve the goals of the CoC, Ramsey County FHPAP, and ESG; and 4) address City concerns while meeting HUD's national housing objectives.

To develop a plan to allocate funds to projects that could best fill gaps in communities service needs, Ramsey County relied upon the 2020 Heading Home Ramsey Needs, the CoC's current strategic priorities, quarterly ESG Provider Meetings, and CoC leadership. Due to an influx of rental assistance monies, the CoC is coordinating with the Performance and Ranking committee to re-examine the FY 2024-25 ESG priorities.

Ramsey County, with technical guidance from a U.S. Department of Housing and Urban Development (HUD) consultant, developed an ESG/ESG-CV Program Manual that outlines performance standards; eligible funding and expenditure requirements, and provided template documents to help the County, City, and funded subrecipients adhere to HUD ESG requirements. Violence Against Women Act (VAWA) language was added to the manual and providers were asked to update their written standards, too. The CoC hosted a Domestic Violence training and the VAWA ruling was reviewed as part of the training. Additionally, a quarterly meeting cadence was established to connect with ESG providers, provide updates on key policies and processes, show grant expenditure benchmarks, and facilitate best practice discussions.

Additionally, in 2024, the current Joint Powers Agreement was amended to include new language about the solicitation process for ESG. ESG now alternates conducting a full solicitation process with ESG subrecipients, followed by a Letter of Interest process on alternate years. Further, with the assistance of HUD technical assistance, Ramsey County revised the ESG monitoring process to align with HUD's requirements for monitoring. This included review of ESG funded activities; evaluation for eligible expenditures and activity funding; administration of HMIS; and tools to assess activity/subrecipient adherence to federal requirements to achieve goals as described in a subrecipient's written funding agreement.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS**

The City continues its current Joint Powers Agreement with Ramsey County, through August 2026, to allocate its ESG funds for programs that 1) promote a comprehensive delivery of homeless services; 2) assist underserved communities; 3) provide services as needed to achieve the goals of the CoC, Ramsey County FHPAP, and ESG; and 4) address City concerns while meeting HUD's national housing objectives.

Ramsey County deferred to the 2020 Heading Home Ramsey Needs, the CoC's current strategic priorities, quarterly ESG Provider Meetings, and CoC leadership to develop a plan to allocate funds to projects that could best fill gaps in communities service needs. Ramsey County, with technical guidance from a U.S. Department of Housing and Urban Development (HUD) consultant, developed an ESG/ESG-CV Program Manual that outlines performance standards; eligible funding and expenditure requirements, and provided template documents to help the County and City and its funded subrecipients adhere to HUD ESG requirements. Additionally, a quarterly meeting cadence was established to connect with ESG providers, provide updates on key policies and processes, show grant expenditure benchmarks, and facilitate best practice discussions.

Additionally, with HUD technical assistance, Ramsey County revised the ESG monitoring process to align with HUD's requirements for monitoring. This included review of ESG funded activities; evaluation for eligible expenditures and activity funding; administration of HMIS; and tools to assess activity/subrecipient adherence to federal requirements to achieve goals as described in a subrecipient's written funding agreement.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities**

1	Agency/Group/Organization	Ramsey County Social Services
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services - Victims Other government - County Continuum of Care
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City ESG staff consult with the Ramsey County Continuum of Care (CoC) Governing Board and/or Steering Committee, as well as the Ramsey County Emergency Solutions Grant Coordinator and the Heading Home Ramsey (HHR) Performance and Ranking Committee to attend required meetings that assist homeless individuals as well as those at-risk of being homeless. ESG staff and the Performance Ranking Committee recommend funding allocations for ESG services. Other outcomes include the development of ESG and CoC program evaluations, additional service provider staff training, and increased service coordination.

<b>2</b>	<b>Agency/Group/Organization</b>	<b>Saint Paul-Ramsey County Public Health</b>
	<b>Agency/Group/Organization Type</b>	Services-Health Health Agency Other government - County
	<b>What section of the Plan was addressed by Consultation?</b>	Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This agency was consulted through phone conversations and evaluation of department plans. Outcomes of consultation include a better understanding of the County programs and priorities for addressing lead-based paint hazards and the need for better coordination with the City’s Department of Safety and Inspections enforcement staff to keep families safe from lead hazards. Department plans demonstrate an increased need for health and social services, affordable housing and transportation, and educational services and activities that include the elderly, as the number of people 65+ will double by 2040. The most recent Community Health Improvement Plan emphasized racial equity, healthy food, active living, access to health care, mental health, violence prevention, homelessness and housing instability, climate change and opioid crisis and response as community priorities.
<b>3</b>	<b>Agency/Group/Organization</b>	<b>YMCA of the North - Youth and Family Services - Prevention Program</b>
	<b>Agency/Group/Organization Type</b>	Services-Children Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless needs assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	This agency was consulted through email and an online survey. The agency’s Youth and Family Services provides housing resources and supportive services throughout Ramsey County and operates a Homeless Prevention program that targets youth 18-24yrs who are at imminent risk of homelessness.
<b>4</b>	<b>Agency/Group/Organization</b>	<b>Neighborhood Development Alliance, Inc (NeDA)</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Housing Community Development Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted through email and through an online survey. The Neighborhood Development Alliance (NeDA) builds affordable housing and empowers communities to create sustainability through financial education and guidance. Consulting and coordinating with this organization will improve the coordination of housing and financial resources for resident and businesses.
<b>5</b>	<b>Agency/Group/Organization</b>	<b>Charles Thompson Memorial Hall</b>
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities Services-Children Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted through email and through an online survey. Nonprofit Charity serving Deaf, hard of hearing, and DeafBlind in Minnesota. Consultation and coordination will improve future services, like infrastructure and ASL access, for residents who have disabilities related to deafness.
<b>6</b>	<b>Agency/Group/Organization</b>	<b>Keystone Community Services</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Victims of Domestic Violence Services-homeless Services-Health Services – Victims Services - Narrowing the Digital Divide
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs Assessment Non-Housing Community Development

	<p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>The organization was consulted through email and through an online survey. Keystone Community Services provides basic needs, youth, senior and case management services. Coordination with this organization will help improve insight into current community housing and non-housing needs.</p>
<p><b>7</b></p>	<p><b>Agency/Group/Organization</b></p>	<p><b>Saint Paul Public Housing Agency</b></p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Housing PHA</p>
	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment Public Housing Needs Non-Homeless Special Needs</p>
	<p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>City and PHA representatives participate on an on-going basis with the CoC and Family Homelessness Prevention Assistance Program Committee and other housing initiatives. The City and PHA have a working partnership which recognizes the challenges faced by the PHA administration and PHA residents. The PHA was consulted over the phone and by email regarding this plan. Outcomes include an understanding of the PHA’s conversion of public housing via HUD’s Rental Assistance Demonstration, capital improvement needs, and the high demand for subsidized rental units demonstrated by extensive waiting lists for public housing and housing vouchers.</p>
<p><b>8</b></p>	<p><b>Agency/Group/Organization</b></p>	<p><b>City of Saint Paul Committees</b></p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>Other government - Local Services-Elderly Persons Business and Civic Leaders</p>
	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Market Analysis Non-Homeless Special Needs Economic Development</p>

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The City of Saint Paul has several community committees that provide policy guidance to the City. Staff to these committees share the online survey, which asked respondents to rate community needs based on the level of importance and the results were used to establish the priority community needs. City staff also offered to attend a regularly scheduled committee meeting to discuss the Consolidated Plan and needs and priorities and presented to the Business Review Council and Advisory Committee on Aging. The outcome was a greater understanding of community needs, especially related to the application process to receive funds as a subrecipient.
9	<b>Agency/Group/Organization</b>	<b>Independent School District #625 (Saint Paul Public Schools)</b>
	<b>Agency/Group/Organization Type</b>	Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City staff and the Saint Paul Public Schools (SPPS) Homeless Liaison serve as committee members of the CoC Governing Board and the Ramsey County Family Homelessness Prevention Assistance Program (FHPAP). Staff also consulted Saint Paul Public Schools on efforts related to data collection on children experiencing homelessness.
10	<b>Agency/Group/Organization</b>	<b>State of Minnesota Department of Employment and Economic Development Office of Broadband Development</b>
	<b>Agency/Group/Organization Type</b>	Services - Narrowing the Digital Divide Other government - State
	<b>What section of the Plan was addressed by Consultation?</b>	Broadband Needs of Housing occupied by Low- and Moderate-Income Households
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Office of Broadband Development was consulted through email. The outcomes include a better understanding of the broadband service connectivity in Saint Paul and the barriers to broadband connectivity.
11	<b>Agency/Group/Organization</b>	<b>Comcast</b>
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide

	<b>What section of the Plan was addressed by Consultation?</b>	Broadband Needs of Housing occupied by Low- and Moderate-Income Households
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted through a virtual meeting conversation. The outcomes include a better understanding of the work Comcast is doing to make broadband connectivity more accessible, which includes the Internet Essentials program. To assist users with internet usage, Comcast Internet Essentials includes access to free, online training materials related to digital skills and internet safety. Their Internet Essentials Partnership Program (IEPP) also helps sponsoring agencies cover the cost of internet service for their clients. Comcast’s commitment to digital inclusion also includes Lift Zones, designated community partners where high-speed internet access is available for free.
<b>12</b>	<b>Agency/Group/Organization</b>	<b>Capitol Region Watershed District</b>
	<b>Agency/Group/Organization Type</b>	Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources
	<b>What section of the Plan was addressed by Consultation?</b>	Hazard Mitigation
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The organization was consulted through email regarding the 2021-2030 Watershed Management Plan. In this plan, the District delineated additional flood areas for the 10-, 50-, 100- and 500-year storms in the Trout Brook and Como Lake watersheds and ranked priority floor areas. The District is actively working with the City on how to best coordinate floor mitigation efforts.
<b>13</b>	<b>Agency/Group/Organization</b>	<b>City of Saint Paul Department of Emergency Management</b>
	<b>Agency/Group/Organization Type</b>	Agency - Emergency Management
	<b>What section of the Plan was addressed by Consultation?</b>	Hazard Mitigation
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Project staff consulted Emergency Management staff on the City’s All-Hazard Mitigation Plan. It was learned that Emergency Management staff is currently working on integrating the plan into Ramsey County’s Multi-Hazard Mitigation Plan as part of a joint effort.

**Table 2 – Agencies, groups, organizations who participated**

**Identify any Agency Types not consulted and provide rationale for not consulting**

No specific agency types were intentionally left out of the Consolidated Plan process.

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Ramsey County	City ESG funding priorities and Ramsey County CoC strategic priorities have similar goals and priorities are complementary. Starting in FY2020, ESG grant dollars are managed under the terms of a Joint Powers Agreement which ensures alignment with Ramsey County CoC priorities. The partnership with Ramsey County benefits Saint Paul residents and people experiencing homelessness through coordination of funding and programming across the CoC.
Thrive MSP 2040	Metropolitan Council	The City’s strategic priorities for anti-poverty measures, fair housing, equal economic opportunity, business development, economic development, and job creation are in line with the strategies identified in the Metropolitan Councils Thrive MSP 2040 plan document.
Saint Paul 2040 Comprehensive Plan	City of Saint Paul	The City’s Comprehensive Plan is in line with the City’s strategic priorities for HUD funded activities.
Analysis of Impediments to Fair Housing Choice -AI	Fair Housing Implementation Council and Consultant	The priority need, Fair Housing and Anti-Discrimination efforts, and the Affirmative Fair Housing actions in the City’s strategic plan will be in coordination with the Analysis of Impediments to Fair Housing Choice.
Saint Paul Housing Trust Fund Resolution	City of Saint Paul	The Housing Trust Fund and resolution 18-1204 for action to create and preserve housing that is affordable at all income levels, address racial, social and economic disparities in housing, and create infrastructure needed to stabilize housing for all in Saint Paul, is in line with the City’s strategic priorities for HUD-funded activities.

**Table 3 – Other local / regional / federal planning efforts**

**Describe cooperation and coordination with other public entities, including the State and any adjacent units of general local government, in the implementation of the Consolidated Plan (91.215(I))**

The City of Saint Paul is one of 19 municipalities located within Ramsey County and represents approximately 40% of the county's land area. Ramsey County is the lead human service agency in these jurisdictions. 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 healthcare, senior services, and employment programs. The City has a close collaboration with Ramsey County, holding monthly meetings to discuss projects of common interests and collaborating in various County's housing solicitations.

Ramsey County is required to prepare its own five-year Consolidated Plan. For consistency, Ramsey County reviews Saint Paul's Consolidated Plan and Saint Paul reviews Ramsey County's Consolidated Plan.

The Saint Paul Public Housing Agency (PHA) is the principal direct provider of housing assistance to the City's low- and moderate-income residents. In Saint Paul, the PHA is a separate legal entity, and not a part of City government. The City works 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 City works closely and cooperatively with the Minnesota Housing Finance Agency (Minnesota Housing) through programs that fund all types of housing needs. Minnesota Housing offers various funding opportunities through an annual competitive application process. These opportunities include housing tax credits (HTCs) as well as deferred and amortized funding sources. During this application process, City and Minnesota Housing staff have routine meetings and on-going conversations to discuss project rankings and work together to determine funding priorities to match limited funding resources with projects that meet the highest local affordable rental housing needs. In addition, City and Minnesota Housing staff meet monthly as part of the Intergovernmental Stabilization Group (ISG) that includes other funding partners such as HUD, Ramsey County, Family Housing Fund, and Local Initiatives Support Corporation (LISC) to collaborate on preserving existing affordable rental housing. For single-family home ownership needs, the City applies and receives funding from Minnesota Housing through their homeowner rehabilitation loan programs. For acquisition, rehabilitation, and new construction of single-family properties, Minnesota Housing provides the City funding through their competitive application process for Community Housing Impact Funds (CHIF).

Through applications to pass-through grants, the City actively participates in the activities of the Metropolitan Council, the state authorized policy-making body, planning agency, and provider of essential services, including transportation and infrastructure, for the Twin Cities metropolitan region. In addition, the City also collaborates with the Metropolitan Council to project and track affordable housing units developed in Saint Paul.

Finally, the City of Saint Paul works closely with the City of Minneapolis. The Minneapolis Saint Paul Housing Finance Board that includes both the Saint Paul HRA and the Minneapolis City Council is a sub allocator of low-income housing tax credits.

**Narrative (optional):**

## **PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The priority needs for the 2025-2030 Consolidated Plan were identified through the needs assessment and market analysis and using input from the consultation and citizen participation process.

During August 2024, City staff attended City-sponsored Safe Summer Nights events held in different locations throughout the city. At these events, staff provided flyers and informational boards about the Consolidated Plan and the opportunity for attendees to participate in a goal voting activity. As a result, hundreds of residents of all ages were informed about the Plan and approximately

During November and December 2024, City staff attended several District Council Board of Directors and Committee meetings. The District Councils are independent, non-profit, resident organizations that engage and represent the people living in each district. District Council Boards of Directors and Committees are made up of volunteers elected by the neighborhood residents. At these meetings, staff provided information about the Consolidated Plan, answered questions, and led discussions on the community needs in each district.

In addition, the Consolidated Plan online survey was open from November 15, 2024, to January 15, 2025, and was available in English, Somali, Hmong, Karen, and Spanish languages. There were two ways to take the survey: (1) as a Saint Paul resident (2) as a staff member of a community organization serving Saint Paul residents. Both surveys were available online and paper versions were available at local libraries. Multiple posts were made on the City's social media platforms, and emails were sent out to District Councils and to government agencies, area chambers of commerce and business associations, community development corporations, and other community social service groups. Organizations were also encouraged to share the resident survey with the communities with whom they work with. The survey asked respondents to rate community needs based on the level of importance. There were four different categories of needs: (1) housing, (2) economic development, (3) public facilities and infrastructure, and (4) public services. Approximately 351 people completed at least one category of the resident survey and 27 staff members from organizations completed at least one category of the organization survey.

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The public comment period for this document was March 10 through April 9, 2025. Notification of the availability of the draft document was sent out through the City's Early Notification System (ENS) and a public notice was published in the Pioneer Press. The notice included information for persons needing special accommodations and assistance for non-English speaking residents. The document was made available for review at the Department of Planning and Economic Development, on its website, and at the Saint Paul Public Library Bookmobile.

A summary of the comments received during the public hearing held on August 12, 2025, as part of the CIB funding cycle is included in Attachment A. An additional public hearing for comment on this document was held March 27, 2025, at Sun Ray Public Library. There were no comments received during the public comment period [*or Public comments received at this meeting are included in Attachment F*].

DRAFT

## Citizen Participation Outreach

DRAFT

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons
1	Public Hearing	Non-targeted/ broad community	On August 12, 2024, at the Rondo Community Library, the Capital Improvement Budget (CIB) Committee held a Public Hearing to solicit comments regarding funding selection and priorities for CDBG allocations. Four people spoke.	Comments at the Public Hearing focused traffic calming and frustration over the CIB process. A summary of the comments is included in Attachment A.	All comments were considered.

DRAFT

2	Public Meeting	Non-targeted/ broad community	Over two Safe Summer Nights events at two different parks, a total of approximately 300 people were informed about the Consolidated Plan and 238 participated in a voting activity.	<p>Participants selected their top three out of seven needs that they felt were the most important priorities for the City. The results of the voting activity in terms of percentage of votes are as follows:</p> <ul style="list-style-type: none"> <li>• emergency shelter - homeless 25%</li> <li>• mental health services 30%</li> <li>• affordable housing 23%</li> <li>• rec and sports facilities 4%</li> <li>• financial assistance for businesses 5%</li> <li>• housing rehab assistance 7%</li> <li>• renter and landlord education 4%</li> </ul>	
3	Internet Outreach	Non-targeted/ broad community	An online survey was open from November to January and received 378 total responses.	Respondents were asked to rate the level of importance of community needs on a scale of 1 (not important at all) to 5 (extremely important).	

DRAFT

4	Internet Outreach	Government agencies, local and regional nonprofit organizations	An online survey was open from November to January and received 378 total responses. The survey was sent out to 44 local community and government organizations.	Representing their organizations, respondents were asked to rate the level of importance of community needs on a scale of 1 (not important at all) to 5 (extremely important).	
5	Public Meeting	Non-targeted/ broad community	Offer to attend Board of Directors or Committee meetings at every District Council. Two District Councils were interested in meeting with staff. Each meeting had approximately 15-20 board/committee members and additional neighborhood residents in attendance.	Discussions focused on project ideas for future funding, questions about current housing being built, and how the City planned to engage the community further.	
6	Newspaper Notice	Non-targeted/ broad community	A Public Hearing notice was published in the Pioneer Press ahead of the public comment period, noticing the public about the Plan and about how and when to view the plan and submit comments.	No comments were received [ <i>or Public comments received at this meeting are included in Attachment F</i> ].	

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7	Internet Outreach	Non-targeted/ broad community	A public hearing notice was sent to the Early Notification System email list (approximately 3,000 people) ahead of the public comment period, noticing the public about the Plan and about how and when to view the plan and submit comments.	No comments were received [or <i>Public comments received at this meeting are included in Attachment F</i> ].	
8	Public Hearing	Non-targeted/ broad community	A public hearing for the Plan was held on March 27, 2025, at Sun Ray Public Library.	No comments were received. [or <i>Public comments received at this meeting are included in Attachment F</i> ].	

**Table 4 – Citizen Participation Outreach**

## Needs Assessment

### NA-05 Overview

#### Needs Assessment Overview

The Needs Assessment examines several key areas critical to creating a livable community for all residents of Saint Paul. Most of the housing data presented is from the HUD Comprehensive Housing Affordability Strategy (CHAS). Other non-housing data is provided by HUD and supplemented with local data.

The section specifically undertakes the following:

- Completes an overall housing needs assessment
- Identifies disproportionate need among the city's racial and ethnic groups in relationship to housing problems and cost burden
- Examines public housing
- Undertakes a homeless needs assessment
- Carries out a non-homeless special needs assessment
- Identifies non-housing community development needs

## NA-10 Housing Needs Assessment - 24 CFR 91.205 (a,b,c)

### Summary of Housing Needs

Demographics	Base Year: 2009	Most Recent Year: 2020	% Change
Population	295,045	305,875	4%
Households	112,990	114,740	2%
Median Income	\$48,757.00	\$59,717.00	22%
Median Income adjusted for inflation to 2009*	\$48,757.00	\$48,876.00	0.2%

**Table 5 - Housing Needs Assessment Demographics**

Data Source: 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year). \*US Bureau of Labor Statistics inflation calculator

### Number of Households Table

(HAMFI is HUD Area Median Family Income)

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	24,170	17,855	24,385	12,440	35,890
Small Family Households	6,220	4,925	7,045	3,940	17,570
Large Family Households	2,815	2,640	2,440	1,245	2,685
Household contains at least one person 62-74 years of age	4,750	3,330	4,990	2,525	6,400
Household contains at least one person age 75 or older	2,635	1,450	2,055	845	1,800
Households with one or more children 6 years old or younger	4,585	4,015	3,520	1,745	3,830

**Table 6 - Total Households Table**

Data Source: 2016-2020 CHAS

**Housing Needs Summary Tables**

1. Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	400	135	175	35	745	50	35	10	10	105
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	940	415	375	200	1,930	110	110	120	155	495
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	1,240	845	490	25	2,600	170	380	355	225	1,130
Housing cost burden greater than 50% of income (and none of the above problems)	9,855	1,655	100	0	11,610	2,460	925	345	40	3,770
Housing cost burden greater than 30% of income (and none of the above problems)	3,185	5,240	2,010	290	10,725	865	1,955	2,555	675	6,050

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	865	0	0	0	865	145	0	0	0	145

**Table 7 – Housing Problems Table**

Data Source: 2016-2020 CHAS

2. Housing Problems 2 (Households with one or more Severe Housing Problems: Lacks kitchen or complete plumbing, severe overcrowding, severe cost burden)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	12,435	3,050	1,145	255	16,885	2,795	1,450	835	430	5,510
Having none of four housing problems	7,235	8,685	10,505	4,760	31,185	1,705	4,670	11,905	6,995	25,275
Household has negative income, but none of the other housing problems	0	0	0	0	0	0	0	0	0	0

**Table 8 – Housing Problems 2**

Data Source: 2016-2020 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	4,290	1,985	540	6,815	600	980	900	2,480
Large Related	1,795	1,025	30	2,850	345	370	200	915
Elderly	3,310	1,155	530	4,995	1,710	930	934	3,574
Other	5,600	3,535	1,050	10,185	900	730	865	2,495
Total need by income	14,995	7,700	2,150	24,845	3,555	3,010	2,899	9,464

Table 9 – Cost Burden > 30%

Data Source: 2016-2020 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	0	0	435	435	425	265	0	690
Large Related	0	0	90	90	305	35	0	340
Elderly	2,080	395	50	2,525	1,160	325	74	1,559
Other	0	4,640	770	5,410	790	0	0	790
Total need by income	2,080	5,035	1,345	8,460	2,680	625	74	3,379

Table 10 – Cost Burden > 50%

Data Source: 2016-2020 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	2,035	1,165	530	220	3,950	265	430	340	245	1,280

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Multiple, unrelated family households	100	80	165	0	345	15	95	129	140	379
Other, non-family households	65	30	180	35	310	0	0	4	0	4
Total need by income	2,200	1,275	875	255	4,605	280	525	473	385	1,663

**Table 11 – Crowding Information – 1/2**

Data Source: 2016-2020 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	<i>Data not available</i>							

**Table 12 – Crowding Information – 2/2**

**Describe the number and type of single person households in need of housing assistance.**

According to the 2023 ACS 5-Year Estimates, there are 45,613 single-person households in Saint Paul with approximately 13,630 single-person households age 65 or older. Elderly nonfamily households, which includes single households, are approximately 12 times more likely to be below the poverty level than elderly family households. Many elderly single-person households may be on fixed incomes and require housing assistance. The number of “other” renter households earning up to 50% AMI represent the most cost-burdened household type (in number) across owners and renters with 9,135 cost-burdened “other” renter households and 4,640 severely cost-burdened “other” households. These very low income “other” households earning up to 50% AMI, which includes single-person households, need housing assistance.

**Estimate the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking.**

The City of Saint Paul does not collect the number of disabled persons or victims of domestic violence, dating violence, sexual assault, and/or stalking. However, the City contracts with the Saint Paul &

Ramsey County Domestic Abuse Intervention Project, an organization serving women who have experienced domestic violence in their household, which reports the number of housing-related services they provide to their clients. Annually, this organization refers approximately 1,248-1,560 domestic violence victims for emergency sheltering with one of the three organizations in the city that provide that service. These providers include Women's Advocates with the capacity to house 25 women and approximately 35 children, Casa de Esperanza that can house up to 11 total people in six rooms, and Women of Nations Eagle's Nest can house up to 44 women and children. In addition to referring women to emergency shelters, Saint Paul & Ramsey County Domestic Abuse Intervention Project also provides housing advocacy to approximately 3,400 clients annually. This includes helping to locate financial assistance for housing and/or moving, housing resources, help with breaking leases for safety reasons, advocacy with landlords, lock changes, assistance in filing protection orders to be safe at home so they don't have to relocate, and connecting to legal assistance when needed for tenants' rights issues. Breaking Free (an ESG subrecipient of Ramsey County) has been supporting victims of sex trafficking in Minnesota for over 25 years. Its mission is empowering survivors of sex trafficking and prostitution to build new lives through safe housing, direct services, healing programs, survivor advocacy, worldwide policy change and hope. The organization primarily serves, though not exclusively, Black females in the age range of 18-60 years old who have experienced sexual exploitation.

### **What are the most common housing problems?**

According to the 2016-2020 CHAS data, 40% of households earning up to 100% of AMI have at least one or more housing problems. HUD defines housing problems as: 1) lacks complete kitchen facilities; 2) lacks complete plumbing facilities; 3) More than one person per room; 4) Cost burden over 30%.

Cost burden is the most reported housing problem in Saint Paul across all tenure types and household income levels. According to 2017-2021 ACS data, 45% percent of renter households are identified as being cost burdened (with housing costs greater than 30% of income) and 23% severely cost burdened (with housing costs greater than 50% of income). For homeownership households, 19% of households are cost burdened and 7% are severely cost burdened.

Sixty percent of the renter households up to 80% of AMI that are cost burdened earn a household income of 30% of the AMI or less. Sixty percent of the renter households that are severely cost burdened earn between 30%-50% of AMI or less. Ownership households experience cost burden at an overall similar rate to rental with slightly different trends at income levels. While 69% of ownership households up to 80% of AMI that are cost burdened earn a household income of 0%-50% of AMI, 79% of ownership households that are severely cost burdened earn a household income of 30% of AMI or less.

Crowding is the second most reported housing problem. Among the households earning up to 100% of AMI with a housing problem, 16% of renter households and 14% of ownership households were

considered either overcrowded (with 1.01 to 1.5 people per room) or severely overcrowded (with more than 1.51 people per room). Sixty-eight percent of households that are considered overcrowded or severely overcrowded earn up to 50% AMI. Forty-eight percent of the renter households that are overcrowded or severely overcrowded earn up to 30% of AMI, while 37% of the ownership households that are overcrowded or severely overcrowded earn 30%-80% of AMI.

**Are any populations/household types more affected than others by these problems?**

Extremely low- and low-income renters are particularly impacted by cost burden and overcrowding. Sixty-two percent of renter households at extremely low incomes (earning 30% AMI or less) are cost burdened and 9% are severely cost burdened. Forty-three percent of renter households at low incomes (earning 30-50% AMI) are cost burdened and 28% are severely cost burdened.

Those households experiencing the highest rate of cost burden are small, related, renter households and “other” renter households earning 0% to 30% of AMI. Of the rental households earning up to 100% AMI experiencing overcrowding, 75% earn 50% AMI or less. This is a much higher rate than the proportion of overcrowded ownership households earning 50% AMI or less, which is 48%.

**Describe the characteristics and needs of Low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered 91.205(c)/91.305(c)). Also discuss the needs of formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance.**

Household characteristics of low-income individuals or families with children that lead to instability include poverty; mental, physical and developmental disabilities; and incidents of domestic violence. Renters facing severe housing cost burden exhibit characteristics linked with housing instability in that when people are unable to pay their rent because of severe cost burden or job disruption, they are at a greater risk for imminent homelessness. Rental rates have increased faster than wages, and competition for lower cost units is high in Saint Paul, which puts low-income households at risk for future homelessness.

The needs of formerly homeless families and individuals receiving rapid re-housing assistance, whose assistance is or will be terminated, continue to need connections to mainstream services as well as continued, but less frequent, monitoring by the case manager that has been working with them.

**If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates:**

Not applicable.

**Specify particular housing characteristics that have been linked with instability and an increased risk of homelessness.**

Particular housing characteristics that have been linked with instability and increased risk of homelessness include:

- Insufficient supply of decent housing affordable to those at the extremely and very low income levels;
- Inadequate supply of Section 8 vouchers and other mainstream subsidized housing vouchers; and
- Insufficient number of permanent supportive housing units.

## **Discussion**

Highlights of the information and analysis provided through this needs assessment include:

- While there are almost the same number of rental households as there are ownership households, rental households are almost two times more likely to experience cost burden and more than three times more likely to experience severe cost burden than ownership households.
- Low- and medium-income small family households make up over a third of all households, while large family households with low- and medium-income make up only 8% of all households.
- Extremely low income (<30% AMI) renters and owners make up roughly half of respondents who experience substandard housing problems.
- Elderly nonfamily households, which includes single households, are approximately 12 times more likely to be below the poverty level than elderly family households.
- Over 72% of SPIP clients, who are victims of domestic violence and their children, are Indigenous, people of color, or refugees/immigrants and the majority have dependent children. An estimated 80% of participants were from Saint Paul and 10% were

homeless and over 80% were assisted in sustaining their housing. The majority were at or below the poverty level.

- 16% of renter households and 14% of ownership households were considered either overcrowded (with 1.01 to 1.5 people per room) or severely overcrowded (with more than 1.51 people per room).
- Forty-eight percent of the renter households that are overcrowded or severely overcrowded earn up to 30% of AMI
- Extremely low- and low-income renters are particularly impacted by cost burden and overcrowding. Sixty-two percent of renter households at extremely low incomes (earning 30% AMI or less) are cost burdened and 9% are severely cost burdened.
- Renters facing severe housing cost burden exhibit characteristics linked with housing instability in that when people are unable to pay their rent because of severe cost burden or job disruption, they are at a greater risk for imminent homelessness. Rental rates have increased faster than wages, and competition for lower cost units is high in Saint Paul, which puts low-income households at risk for future homelessness.

**NA-15 Disproportionately Greater Need: Housing Problems – 91.205 (b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

**Introduction**

HUD requires communities to identify disproportionately greater need in terms of members of a racial or ethnic group experiencing severe housing problems at a greater rate than the income level as a whole. For the purposes of HUD, a disproportionately greater need exists when the percentage of households (of a particular racial or ethnic group) that experience one or more housing problems is at least 10 percentage points higher than the percentage of households (of the income level as a whole) that experience one or more housing problems. The different income levels include 0-30% of AMI, 30-50% of AMI, 50-80% of AMI, and 80-100% of AMI. HUD defines housing problems as: 1) lacks complete kitchen facilities; 2) lacks complete plumbing facilities; 3) More than one person per room; 4) Cost burden over 30%.

The HUD-defined analysis of disproportionate housing needs shows that there is close to a disproportionate number of Asian households earning 30-50% of AMI and 80-100% of AMI that are experiencing housing problems. The City recognizes that communities of color in Saint Paul statistically have higher unemployment rates and lower incomes and be disproportionately impacted by barriers to housing access including restrictive tenant screening criteria and discrimination. The City has a strong focus on addressing racial disparities, and has funds allocated to programs intended to close these gaps and to ensure that we are Affirmatively Furthering Fair Housing.

**0%-30% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	19,710	4,330	955
White	8,550	1,805	525
Black / African American	5,405	1,545	194
Asian	3,110	550	125
American Indian, Alaska Native	240	65	10
Pacific Islander	0	0	0
Hispanic	1,640	210	80

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**30%-50% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	12,100	5,465	0
White	6,275	3,165	0
Black / African American	2,245	1,070	0
Asian	2,005	575	0
American Indian, Alaska Native	105	50	0
Pacific Islander	0	0	0
Hispanic	1,070	465	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**50%-80% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	6,310	12,970	0
White	3,875	8,025	0
Black / African American	925	1,890	0
Asian	805	1,585	0
American Indian, Alaska Native	35	70	0
Pacific Islander	4	20	0
Hispanic	625	920	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**80%-100% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,770	10,235	0
White	1,180	7,555	0
Black / African American	120	955	0
Asian	265	845	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	20	0
Hispanic	170	590	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data Source: 2016-2020 CHAS

\*The four housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4. Cost Burden greater than 30%

**Discussion**

Comparing the percentage of households with one of the four housing needs by race with the percentage of the total population by race provides another lens by which to look at disproportionate need. Twenty-seven percent of households at extremely low incomes (0-30% of AMI) with one or more of the four housing problems are African American households, while African Americans represent only 18% of the city’s population. White households follow a similar pattern for low and moderate-income households. While this group represents 51% of the City’s population, 61% of low-income households (50-80% of AMI) and 67% of moderate-income households (80-100% of AMI) experiencing one or more housing problems are white households. However, white households make up 62% of low-income households and 73% of moderate-income households, which leads to an overrepresentation of white households with a housing problem at those income levels.

**NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.205 (b)(2)**

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

**Introduction**

HUD requires communities to identify disproportionately greater need in terms of members of a racial or ethnic group experiencing severe housing problems at a greater rate than the income level as a whole. For the purposes of HUD, a disproportionately greater need exists when the percentage of households (of a particular racial or ethnic group) that experience one or more housing problems is at least 10 percentage points higher than the percentage of households (of the income level as a whole) that experience one or more housing problems. The different income levels include 0-30% of AMI, 30-50% of AMI, 50-80% of AMI, and 80-100% of AMI. HUD defines severe housing problems as: 1) lacks complete kitchen facilities; 2) lacks complete plumbing facilities; 3) More than 1.5 persons per room; 4) Cost burden over 50%. The "severe housing problems" category differs from the "housing problems" category by households being more overcrowded and experiencing a greater cost burden.

The HUD-defined analysis of disproportionate housing needs shows that there is a disproportionate number of Asian and Hispanic households experiencing severe housing problems. The City recognizes that communities of color in Saint Paul statistically have higher unemployment rates and lower incomes and be disproportionately impacted by barriers to housing access including restrictive tenant screening criteria and discrimination. The City has a strong focus on racial equity and addressing disparities, and has funds allocated to programs intended to close these gaps and to ensure that we are Affirmatively Furthering Fair Housing.

**0%-30% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	15,565	8,475	955
White	6,740	3,615	525
Black / African American	4,120	2,835	194
Asian	2,600	1,060	125
American Indian, Alaska Native	200	100	10
Pacific Islander	0	0	0

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Hispanic	1,255	595	80

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**30%-50% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	5,135	12,435	0
White	2,490	6,945	0
Black / African American	920	2,395	0
Asian	1,250	1,330	0
American Indian, Alaska Native	10	140	0
Pacific Islander	0	0	0
Hispanic	325	1,215	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**50%-80% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	1,910	17,370	0
White	790	11,115	0
Black / African American	335	2,475	0
Asian	550	1,840	0
American Indian, Alaska Native	0	100	0
Pacific Islander	0	24	0
Hispanic	235	1,305	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities,
2. Lacks complete plumbing facilities,
3. More than 1.5 persons per room,
4. Cost Burden over 50%

**80%-100% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	455	11,550	0
White	95	8,640	0
Black / African American	55	1,020	0
Asian	220	895	0
American Indian, Alaska Native	0	20	0
Pacific Islander	0	20	0
Hispanic	90	680	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data 2016-2020 CHAS  
Source:

\*The four severe housing problems are:

1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

## **Discussion**

Under the HUD-defined analysis of disproportionate housing need by race, the following disproportionate needs were identified in the City of Saint Paul:

- Asian households at 30%-50%, 50%-80%, and 80%-100% of AMI
- Hispanic households at 80%-100% of AMI

Comparing the percentage of households with one of the four housing needs by race with the percentage of the total population by race provides another lens by which to look at disproportionate need and confirms the HUD-defined analysis. At low incomes (50-80% of AMI) and moderate incomes (80-100% of AMI), 29% and 48%, of households, respectively, experiencing one or more of the four severe housing problems is an Asian household, while this group represents 18% of the City's population. While Hispanics represent 10% of the city's population, Hispanic households make up 20% of the moderate-income households (80-100% of AMI) experiencing a severe housing problem.

## NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.205 (b)(2)

Assess the need of any racial or ethnic group that has disproportionately greater need in comparison to the needs of that category of need as a whole.

### Introduction:

HUD requires communities to identify disproportionately greater need in terms of households of a particular racial or ethnic group experiencing a housing cost burden at a greater rate than the jurisdiction as a whole. For the purposes of HUD, a disproportionately greater need exists when the percentage of households (of a particular racial or ethnic group) that experience housing cost burden is at least 10 percentage points higher than the percentage of households (of the jurisdiction as a whole) that experience housing cost burden. The different levels of housing cost burdens include: <=30% (households without a cost burden, the housing cost to income ratio is less than 30%), 30-50% (cost-burdened households that pay between 30% and 50% of their income on housing-related costs), and >50% (severely cost-burdened households that pay more than 50% of their income on housing-related costs).

The HUD-defined analysis of disproportionate housing cost burden shows a disproportionate severe cost burden for African American households. The City recognizes that communities of color in Saint Paul statistically have higher unemployment rates and lower incomes and be disproportionately impacted by barriers to housing access including restrictive tenant screening criteria and discrimination. The City has a strong focus on racial equity and addressing disparities and has designed funding programs intended to close these gaps to ensure we are Affirmatively Furthering Fair Housing.

### Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	73,805	19,510	18,170	1,010
White	52,610	11,060	9,510	550
Black / African American	8,005	3,675	4,250	194
Asian	7,150	2,250	2,285	155
American Indian, Alaska Native	410	160	185	10
Pacific Islander	40	4	0	0
Hispanic	3,820	1,840	1,250	80

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2016-2020 CHAS

**Discussion:**

Under the HUD defined analysis of disproportionate housing cost burden need by race, the following disproportionate needs were identified in the City of Saint Paul:

- African American households experiencing a severe cost burden of greater than 50% of their income.

Comparing the percentage of households that experience housing cost burden by race with the percentage of the total population by race provides another lens by which to look at disproportionate need. The HUD-defined disproportionate severe housing cost burden for African American households was also demonstrated through this comparison to the percentage of the total population by race. African Americans represent 18% of the city's population, yet they make up 23% of the households experiencing severe cost burden. Additionally, 51% of the city's population is white, but they make up 57% of the households experiencing housing cost burden that pay between 30% and 50% of their income on housing-related costs.

## **NA-30 Disproportionately Greater Need: Discussion – 91.205(b)(2)**

### **Are there any income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category as a whole?**

Using the HUD-defined analysis of disproportionate housing need, there are income categories in which a racial or ethnic group has disproportionately greater need than the needs of that income category.

Close to disproportionate housing needs (lacks complete kitchen facilities; lacks complete plumbing facilities; More than one person per room; Cost burden over 30%) were identified for the following groups:

- Asian households at 30-50% of AMI and at 80-100% of AMI

Disproportionate severe housing needs (lacks complete kitchen facilities; lacks complete plumbing facilities; More than one person per room; Cost burden over 30%) were identified for the following groups:

- Asian households at 30%-50%, 50%-80%, and 80%-100% of AMI
- Hispanic households at 80%-100% of AMI
- African American households experiencing a severe cost burden

### **If they have needs not identified above, what are those needs?**

Additional disproportionate housing needs were identified by comparing the percentage of households with housing problems by race or ethnicity with the percentage of the total population by race or ethnicity. Twenty-seven percent of households at extremely low incomes (0-30% of AMI) with one or more of the four housing problems are African American households, while African Americans represent only 16% of the city's population. White households follow a similar pattern for low and moderate-income households. While this group represents 51% of the City's population, 61% of low-income households (50-80% of AMI) and 67% of moderate-income households (80-100% of AMI) experiencing one or more housing problems are white households.

At low incomes (50-80% of AMI) and moderate incomes (80-100% of AMI), 29% and 48%, of households, respectively, experiencing one or more of the four severe housing problems is an Asian household, while this group represents 18% of the City's population. While Hispanics represent 10% of the city's population, Hispanic households make up 20% of the moderate-income households (80-100% of AMI) experiencing a severe housing problem.

Disproportionate housing cost burden were also identified for African American households experiencing a severe cost burden.

Because African American households are disproportionately facing more cost burden issues, it can be concluded that more Hispanic and Asian households are experiencing more housing problems such as housing quality and overcrowding issues. These groups identified, people of color including Asians, Hispanics, African Americans, and American Indian, Alaska Native, may face disproportionate housing needs of cost burden and housing problems due to greater unemployment rates and lower incomes.

According to the 2022 5-Year ACS estimates, the City's overall employment was 5%, while the unemployment rate for people of color was 7%. These groups are also more likely to have employment in jobs that pay wages lower than the median income level. According to the 2013-2022 5-Year ACS estimates, the citywide median household income is \$69,919, while the median household income for African American households is \$40,218, the median household income for Asian households is \$66,016, the median household income for Hispanic households is \$53,113 and the median household income for American Indian, Alaska Native households is \$34,474. The higher unemployment rates and lower incomes combined with a tight rental market and low supply of affordable housing lead many in these groups to experience disproportionate housing needs.

**Are any of those racial or ethnic groups located in specific areas or neighborhoods in your community?**

The City has geographic areas where the racial and ethnic groups that have disproportionately greater housing need are concentrated. To be considered an area of higher concentration, such subpopulations of disproportionately greater need represent at least one-third of the residents living in a particular census tract for racial groups or at least one-fourth of the residents living in a particular census tract for ethnic groups. These census tracts are illustrated in a map titled Concentrations of Disproportionately Greater Need Subpopulations in Attachment B and include:

- African American residents in census tracts 335, 336, 337, 339 in the Summit-University neighborhood, census tracks 324 and 428 in the Frogtown neighborhood, census tract 376.03 in the Highland Park neighborhood, and census tract 374.03 in the Battle Creek/Highwood Hills neighborhood;
- Asian residents in census tract 327 within the Frogtown neighborhood, census tracts 313 and 305 within the North End neighborhood, census tracts 306.01, 306.02, 309, 310, 311, 315, and 316 within the Payne-Phalen neighborhood, census tracts 317.01 within the Dayton's Bluff neighborhood, census tracts 307.03 and 317.02 within the Greater East Side neighborhood;

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- Hispanic residents in census tract 372 within the West Side neighborhood and census tract 318.01 within the Greater East Side neighborhood.

## **NA-35 Public Housing – 91.205(b)**

### **Introduction**

The Saint Paul Public Housing Agency (PHA) owns and operates the City's public housing units. PHA's mission statement is “The PHA helps families and individuals with low incomes achieve greater stability and self-reliance by providing safe, affordable, quality housing and links to community services.”

The PHA owns and manages 418 public housing units and 3,836 units with Project-Based Rental Assistance (PBRA) that were converted from public housing via HUD’s Rental Assistance Demonstration (RAD) effective January 1, 2020. The PHA also administers 5,243 Housing Choice Vouchers (as of January 2025). These include 175 Family Unification Program (FUP) vouchers, 318 Mainstream Program/Disability vouchers, 276 Veterans Affairs Supportive Housing (VASH) vouchers and 157 Emergency Housing Vouchers (EHV). PHA has allocated 864 project-based vouchers (PBVs); and more than half of those (510) are in supportive housing developments. In total, the PHA provides nearly 9,500 affordable homes to more than 21,000 people.

The PHA has maintained its High Performer status under HUD’s Public Housing Assessment System (PHAS) for 32 consecutive years. The PHA does not administer HOPE VI activities or Mixed-Finance Modernization and Development. PHA has also maintained its High Performer status under HUD’s Section 8 Management Assessment Program (SEMAP) for 23 consecutive years. The PHA successfully implements and administers current agreements for Project-Based Vouchers (PBV); including PBV in supportive housing that supports the State of Minnesota, Ramsey County, and the City of Saint Paul with their plans to end homelessness.

PHA serves households with low to extremely low incomes. Most (79%) of residents and participants are “extremely low-income” households, earning an income of less than 30% of AMI. The average household size is 1.94 in the multifamily program and 4.6 in the public housing program. The average household income is \$18,947 in multifamily and \$38,495 in public housing.

**Totals in Use**

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	387	4,570	610	3,960	NO DATA	NO DATA	NO DATA

**Table 22 - Public Housing by Program Type**

\*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Data Source: PIC (PIH Information Center)

**Characteristics of Residents**

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	
Average Annual Income	0	0	38,495	18,588	14,680	19,189	NO DATA	NO DATA	
Average length of stay	0	0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA

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Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Household size	0	0	4.6	2.4	2.1	2.4	NO DATA	NO DATA
# Homeless at admission	0	0	0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
# of Elderly Program Participants (>62)	0	0	NO DATA	1,264	127	1,137	NO DATA	NO DATA
# of Disabled Families	0	0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
# of Families requesting accessibility features	0	0	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

**Race of Residents**

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	22	1,227	157	1,070	NO DATA	NO DATA	NO DATA

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Black/African American	0	0	162	2,828	372	2,456	NO DATA	NO DATA	NO DATA
Asian	0	0	185	216	18	198	NO DATA	NO DATA	NO DATA
American Indian or Alaska Native	0	0	7	103	24	79	NO DATA	NO DATA	NO DATA
Pacific Islander	0	0	0	0	0	0	NO DATA	NO DATA	NO DATA
Other	0	0	11	196	37	159	NO DATA	NO DATA	NO DATA

\*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

**Ethnicity of Residents**

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	5	171	235	37	198	NO DATA	NO DATA	NO DATA
Not Hispanic	0	72	4,005	4,335	573	3,762	NO DATA	NO DATA	NO DATA

\*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition

Table 25 – Ethnicity of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

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**Section 504 Needs Assessment: Describe the needs of public housing tenants and applicants on the waiting list for accessible units:**

It is Saint Paul PHA's policy to fully comply with all applicable federal, state, and local laws and ordinances, including Section 504, such that Saint Paul PHA shall give a qualified person with a disability, through a reasonable accommodation, an equal opportunity to participate in and benefit from its housing, aid, benefit, or service.

As of January 2025, approximately 20% of the over 5,500 households on the Saint Paul PHA multifamily waiting list had reported that they were disabled. Households with a disabled head of household, cohead, or spouse may be eligible for a disability allowance. Many applicants for public housing, multifamily, or housing choice vouchers need housing with one or more accessibility features, such as no-step approaches, grab bars in bathrooms, and easily operated door handles. At the same time, many PHA applicants need accessible housing that is affordable, as their average household income is often just slightly over the federal poverty rate (defined in 2024 as \$15,060 for an individual, \$31,200 for a household of four).

Since Section 504 also recognizes that residents with challenges may need additional services, Saint Paul PHA also offers the following services:

- **Congregate Housing Services Program (CHSP)** provides an individualized program for residents who are elderly or disabled and require a moderate amount of non-medical services to maintain independence.
- **Wilder Assisted Living Program (ALP)** provides comprehensive supportive services to assist frail or disabled residents at risk of nursing home placement.
- **The Accessible Space Inc. (ASI)** provides up to 24-hour personal care attendant service and support services for residents who experienced brain injuries. Other ASI participants include PHA residents with memory impairments, mobility impairments and/or complications from diabetes.

PHA also maintains 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. The PHA Central Administrative Office building meets all Section 504 and ADA requirements.

**Most immediate needs of residents of Public Housing and Housing Choice voucher holders**

There is a great need for more affordable housing for all bedroom sizes. All PHA waiting lists (public housing, multifamily, and Housing Choice Voucher) are currently closed with thousands of applicants on the lists and expected wait times of multiple years.

### **How do these needs compare to the housing needs of the population at large**

Applicants for Saint Paul Public Housing programs have similar housing needs to many Saint Paul residents. Low- and moderate-income households need housing that is affordable compared to their income and family size. However, such affordable housing demands exceed the city's current housing supply. Currently, Saint Paul PHA consistently operates at a 99% occupancy rate and its waiting lists remain closed. At the same time, low- and moderate-income residents have few private market alternatives especially when the private rental market of the Twin Cities has a 4.6% rental vacancy rate metro-wide (CoStar, January 2020), which is less than the nationwide average rental vacancy rate of 6.8% (U.S. Census Bureau, third quarter 2019). Consequently, the lack of affordable housing in the Twin Cities effectively reduces housing choice for many low- and moderate-income residents.

### **Discussion**

The lack of affordable housing effectively reduces housing choice for many Saint Paul residents. At the same time, economic conditions can discourage the preservation of affordable housing. In response, the City Council passed resolution 18-1204, calling for action to create and preserve housing that is affordable at all income levels; address racial, social and economic disparities in housing; create infrastructure needed to stabilize housing; fund an Affordable Housing Trust Fund; and continue to fund down payment assistance for first-time homebuyers. This resolution is a public acknowledgement that housing, especially affordable housing, is a priority for the City.

The 2040 Comprehensive Plan supports affordable housing development. Affordable housing priorities are preservation and production of rental housing affordable for those at or below 30% of AMI; create homeownership opportunities for households with low- and moderate-incomes; housing preservation for low-income elderly homeowners between 0-50% of AMI; and provide housing for special needs populations. Policy H-32 states "Continue to use City/HRA resources to support affordable rental housing citywide with at least 30 percent of the total rental units (both market-rate and affordable) financially assisted by the City/HRA being affordable to households earning 60 percent or less of AMI with at least: 10% of all units being affordable to households earning 30% of AMI; 10% of all units being affordable to households earning 50% of AMI; and 10% of all units being affordable to households earning 60% of AMI."

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Even with significant barriers, there have been 119 market rate and 246 affordable housing units built in Saint Paul in 2024. With limited financial capacity, the City must partner with HUD, Minnesota Housing Finance Agency, and private foundations to finance affordable housing developments.

## **NA-40 Homeless Needs Assessment – 91.205(c)**

### **Introduction:**

This section provides statistical data to describe the needs for shelters for adults and families experiencing homelessness. That said, the number of people in shelters - including adult singles, youth, and families – often exceed the capacity of shelters. The groups discussed in this section are:

- Homeless families
- Homeless adults
- Homeless youth/unaccompanied youth
- Homeless veterans and their families
- Chronically homeless individuals
- Persons with HIV
- Sheltered and unsheltered homeless

Ramsey County Continuum of Care (CoC) annually conducts a point-in-time study those experiencing homelessness in Ramsey County. Most recently available data is from January 2023. Additionally, every three years since 1991, Wilder Research has conducted a statewide survey of those experiencing homelessness. The most recent study took place on October 26, 2023. That said, point-in-time surveys identify needs and characteristics of homeless residents on a certain day. Wilder Research states that if the point-in-time study was extended over a longer period, many short-term episodes of homelessness would be reported, but relatively few long-term episodes would be captured.

## Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	566	15	671	NO DATA	NO DATA	166
Persons in Households with Only Children	23	0	NO DATA	NO DATA	NO DATA	NO DATA
Persons in Households with Only Adults	723	353	NO DATA	NO DATA	NO DATA	315
Chronically Homeless Individuals	197	250	NO DATA	NO DATA	NO DATA	NO DATA
Chronically Homeless Families	15	2	NO DATA	NO DATA	NO DATA	NO DATA
Veterans	75	15	NO DATA	NO DATA	NO DATA	NO DATA
Unaccompanied Child	73	49	NO DATA	NO DATA	NO DATA	NO DATA
Persons with HIV	87	7	NO DATA	NO DATA	NO DATA	NO DATA

Table 26 - Homeless Needs Assessment

Alternate Data Source Name: Ramsey County CoC

Data Source Comments: Data Source: Point-in-Time Ramsey County CoC 2023

**If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth):**

Definition of Homeless Residents: individuals are considered homeless if they lack a fixed, regular, & adequate nighttime residence and either (a) have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, (b) have a primary nighttime residence that is a supervised, publicly- or privately- operated shelter designated to provide temporary living arrangements (i.e. emergency shelters, transitional housing, battered women's shelters), or (c) are an individual who resided in a shelter or place not meant for human habitation and is exiting an institution where he or she temporarily resided.

Definition of Long-term Homeless Residents: individuals are considered chronically homeless if they have either (a) been homeless for a year or longer or (b) been homeless at least four times in the past three years.

Definition of Homeless Youth: youth (including minors aged 17 and under and young adults aged 18-24) are considered homeless if they 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 street.

Wilder Research's most recent 2023 Minnesota Homeless Study and studies from previous years provide general statistics about populations experiencing homelessness in Minnesota and the Twin Cities,

#### Homeless Families

- Families with children under 18 make up nearly half (48%) of the homeless population in the Twin Cities metro.

- There's been a 19% decrease in the number of children who were homeless with their parents since 2018.

#### Homeless Adults

- More than three-quarters (77%) of people experiencing homelessness identify as a person of color, and nearly half the homeless population identifies as Black (45%) in the Twin Cities metro, even though they make up only 16% of St Paul residents
- In the Twin Cities metro, 19% of homeless adults were diagnosed with substance abuse disorder, 51% reported a physical health condition, 56% reported a significant mental illness
- More than half (51%) of people experiencing homelessness in Minnesota first experienced homelessness before they turned 24.
- People who do not stay in a formal shelter but stay outside, on transit, or temporarily doubled up make up about 18% of experiencing homeless.
- Older adults (age 55+) were the only age group that saw an increase over 2018 (7%). Although older adults are a growing group of people experiencing homelessness, they are still least likely to be homeless compared to their numbers in the overall population of Minnesotans.

#### Homeless Youth/Unaccompanied Youth:

- 60% of homeless youth in Minnesota are living in the Twin Cities
- 36% of homeless youth have lived in a foster home
- 18% of homeless youth identified as lesbian, gay, bisexual or unsure about sexual orientation
- 57% of homeless youth report some type of significant mental illness; 36% report some type of chronic physical health issues
- Children and youth (age 24 and younger) account for 17% of those experiencing homelessness in Ramsey County.
- Since 2018, there was a 19% decrease in the number of children who were homeless with their parents.
- There was a 17% decrease in the number of homeless youth (age 24 and younger) on their own without their parents.

#### Homeless Veterans

- In Ramsey County, 17% of men experiencing homelessness have served in the U.S. Military, compared to 2% of women

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- 46% of Minnesota Veterans experiencing homelessness identify as Native American, Black, Asian, or Hispanic/Latino, which is an overrepresentation compared to Minnesota’s overall Veteran population (less than 10% of the population)
- 87% of Veterans experiencing homelessness in Minnesota reported having at least one serious or chronic disability (mental health condition, substance abuse disorder, chronic medical condition, cognitive impairment, or other condition that limits work or activities of daily living).
- 57% of homeless Veterans are part of the Minnesota Homeless Veteran Registry, a program that connects Veterans experiencing homelessness with housing and services in their community.

### Long-Term (Chronically) Homeless Individuals

- In Ramsey County, 59% of women and 60% of men experiencing homelessness have been without a regular or permanent place to live for a year or more.
- 64% of long-term homeless have a serious mental illness, compared to 54% of other homeless adults
- 25% have a substance abuse disorder diagnosis, compared to 15% of other homeless adults
- 47% of long-term homeless have a condition that limits work, compared to 37% of other homeless adults

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered (emergency shelter)</b>	<b>Sheltered (transitional housing)</b>	<b>Unsheltered (optional)</b>
Black/African American	242	105	127
American Indian or Alaska Native	40	6	32
Asian or Pac Islander	40	5	34
Multiracial	33	5	26
White	230	38	127
<b>Ethnicity:</b>	<b>Sheltered (emergency shelter)</b>	<b>Sheltered (transitional housing)</b>	<b>Unsheltered (optional)</b>
Latinx	42	14	21

**Estimate the number and type of families in need of housing assistance for families with children and the families of veterans.**

**Homeless Families with Children:** According to Saint Paul/Ramsey County CoC 2023 Point-in-Time data, there are 194 households in Ramsey County with at least one adult and one child that are experiencing homelessness, and 17 that are chronically homeless. The 2023 Minnesota Homeless Study conducted by Wilder Research reports a 19% decrease in the number of children homes with their parents since 2018. According to that study, 60% of Ramsey County respondents that have children aged 17 or younger are women. People in families (with children under 18) account for 4 out of 10 people experiencing homelessness in Minnesota and children under age 18 with parents make up 29% of people experiencing homelessness in the Twin Cities Metro. In Ramsey County, 56% of the children living with parents experiencing homelessness are age 5 or younger.

Data collected by Saint Paul Public Schools (SPPS) identified approximately 1,739 children who experienced homelessness in Saint Paul during the 2023-2024 school year. So far in the 2024-2025

school year, over 1,000 students have experienced homelessness. The following narrative is from SPPS staff who work closely with students and families that experience unstable housing:

*For students and their families in St Paul schools, affordable housing is very difficult to find and there are limited choices of available housing. For those with vouchers for section 8 housing, there is limited housing stock and some who run out of time finding their housing and lose their vouchers due to the limited availability. Students and families want to stay in St Paul so that their children can attend SPPS and without housing, this becomes really challenging.*

*Another challenge is with our students and their families seeking shelter. There are over 30 families on the waitlist with Coordinated Access for Housing for families and the waitlist can last up to four weeks. This means that there can be upwards of 28 days for a family to wait and try to piece together a plan for their children while waiting. In Ramsey County at this time, there are only 165 family shelter beds available on any given night, so over 70% of our students are typically doubled up and precariously housed.*

*St Paul students and families struggle to find safe, reliable and adequate housing. Having a concerted look at housing access is necessary to maintain a healthy community and will help our schools stay healthy and will assist with our enrollment levels.*

Wilder Research reports that the median income for people experiencing homelessness is only \$300 per month in the Twin Cities Metro Area. While homeless families may have higher incomes than homeless single adults, private market housing is still an unattainable goal. The average monthly rent for a one-bedroom apartment in the Twin Cities Metro Area is \$1,115, which is 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 can severely impact a child's development. In addition to the trauma of having no stable residence, homeless children often go without necessities, such as medical care, meals, and clothing, and experience learning problems. Most homeless residents cannot secure permanent housing especially when government-assisted housing is limited.

**Homeless Families of Veterans:** According to Saint Paul/Ramsey County CoC 2023 Point-in-Time data, there were 90 veterans experiencing homelessness in Ramsey County. According to the Veterans Experiencing Homelessness – Findings from the 2018 Minnesota Homeless Study, (Wilder Research, January 2020), 56% of women reported that they had children under the age of 18, while 22% of men reported the same. Twenty-five percent of women and 2% of men were accompanied by their children on the night of the study.

### **Describe the Nature and Extent of Homelessness by Racial and Ethnic Group.**

There is an overrepresentation of Native American, Black, and Hispanic/Latino people experiencing homelessness in the Twin Cities metro. According to the 2023 Minnesota Homeless Study Issue Brief, 77% of people experiencing homelessness in the Twin Cities metro identify as a person of color, and 45% of the homeless population identifies as Black or African American, 20% identifying as Hispanic or Latino, 18% as Native American, and 4% as Asian.

In Ramsey County, 56% of women and 49% of men experiencing homelessness identify as Black or African American, while only 13% of the county's population is Black or African American. Nine percent of Ramsey County's population is Hispanic or Latino, while 10% of women and 11% of men experiencing homelessness identify as Hispanic or Latino. One percent of Ramsey County's population are Native American, compared to 16% of the women and 12% of the men experiencing homelessness are Native American. This trend differs for white and Asian population. In Ramsey County, 16% of the population is Asian, compared to the statistic that 5% of women and 7% of men experiencing homelessness are Asian.

### **Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

According to recent Ramsey County CoC Point-in-Time surveys, the number of persons in an emergency shelter has increased each year. In 2021, the number of persons in emergency shelter rose to 1133, an increase of 28 percent. Further, in 2021, the number of unsheltered persons rose to 314. – an increase of 76 percent.

**Sheltered Homelessness-Single Adults:** Over the last few years, Catholic Charities has developed new facilities and services that will greatly improve their ability to reach out and help the community. The Dorothy Day Center campus has two new buildings. The first building, *Higher Ground Saint Paul*, opened in January 2017. This five-story building has emergency shelter and permanent homes for 470 people, along with added space for medical services. The second building, The St. Paul Opportunity Center, or SPOC, opened in October of 2019 and helps to serve the homeless population in Saint Paul by providing 177 affordable apartments as well as a resource center. The facility is open daily and connects people to key services to improve their health, income, housing stability, and overall well-being. This In addition, overflow shelter demands have been so great that the City and Ramsey County have committed to extending the 64-bed winter overflow homeless shelter, now called *Safe Space Shelter*, to be operated year-round by Model Cities.

**Sheltered Homelessness-Homeless Families:** Catholic Charities Family Service Center is the main Ramsey County emergency shelter (65 beds) for homeless families in addition to the 40 shelter beds provided by Project HOPE. The need for housing for families remains great. In 2018, Ramsey County

Coordinated Access received 1,204 total calls from eligible Ramsey County families seeking housing or shelter and 795 families were placed on the waitlist for shelters.

**Unsheltered homelessness:** In years past, it has been difficult to determine the actual number of unhoused people who are unsheltered on a particular day. However, due to the creation of winter warming spaces located throughout areas in St. Paul (with high concentration of homeless individuals in Ramsey County), staff have been better able to accurately capture the numbers of unsheltered in Ramsey County. The CoC’s 2024 Point-in-Time (PIT) survey reports an unsheltered population of 410 – an increase of 23 percent since 2019. Although the PIT count has been enhanced to capture those in warming spaces, as well as outdoor encampments, the annual survey may still miss persons who are doubled-up, sleeping outside, or living in unknown locations not typically meant for human habitation. 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 are needed. More importantly, 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.

**Discussion:**

While the unhoused and unsheltered populations are increasing, there has been improvements in shelter spaces and services. These improvements are still insufficient to meet ideal outcomes that include enough housing and related support services to get everyone on a pathway to stable housing and general well-being.

## **NA-45 Non-Homeless Special Needs Assessment - 91.205 (b,d)**

### **Introduction:**

This section discusses the special needs assessment of Saint Paul residents who are not homeless but require supportive housing or support services. Within the City, many families and individuals struggle with multiple barriers to secure and maintain housing. Consequently, these 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 include:

- Elderly
- Frail Elderly
- Persons with Physical Challenges, Persons with Developmental Challenges, and Persons with Mental Health Challenges
- Persons with Chemical Dependency Issues, such as alcohol or other drug addictions
- Persons with Limited English Proficiency
- Persons with HIV/AIDS

### **Describe the characteristics of special needs populations in your community:**

**Elderly and Frail Elderly:** According to the 2023 5-Year ACS estimates, Saint Paul has 36,352 elderly (age 65 and older) persons, and the State Demographic Center forecasts dramatic growth for Saint Paul elderly during the next 20 years as the "baby boomers" continue to enter retirement age. Saint Paul has 3,574 cost-burdened elderly homeowner households and 4,995 cost-burdened elderly renter households (2016-2020 CHAS). In 2021, Ramsey County provided case management to 1,192 County residents for services for people 65 years old and older who require the level of care provided in a nursing home but choose to live in the community. Saint Paul elderly will need to maintain their homes, make updates, or seek housing alternatives with universal design. Moreover, as elderly live longer, the frail elderly will place significant demands on both institutional and community-based long-term care services (i.e. assisted-care housing or in-home care services).

**Residents with Developmental, Physical, Mental Health Challenges or Persons with Chemical Dependency:** According to 2022 5-Year ACS estimates, Saint Paul has approximately 19,108 residents with a cognitive difficulty. These residents may have difficulty remembering, concentrating, or making decisions because of a physical, mental, or emotional problem. In 2021, Ramsey County provided case management to 3,159 County residents through its Developmental Disability waiver and non-waiver programs, 5,592 County residents through its Community Access for Disability Inclusion waiver program, and 133 County residents through its Brain Injury waiver program. 59% of these residents were under age 55. The 2022 5-Year ACS also estimates Saint Paul has 15,017 residents with an ambulatory difficulty - highlighting the need for accessible-designed housing. In 2023, Ramsey County provided mental health case management to approximately 4,126 individuals for services to provide comprehensive psychiatric treatment and support so that people with serious and persistent mental illness can live in the

community. Residents in recovery from chemical dependency issues need sober housing. In contrast, chronically inebriated residents need a "Housing First", harm-reduction housing program.

**Residents living with HIV/AIDS:** According to Minnesota Department of Health 2023 data, there are 1,137 residents living with HIV/AIDS in Saint Paul.

**Residents with Limited English Proficiency:** According to 2022 5-Year ACS estimates, Saint Paul has approximately 38,771 residents who speak English "less than very well".

### **What are the housing and supportive service needs of these populations and how are these needs determined?**

**Housing and supportive needs for Elderly and Frail Elderly:** Saint Paul elderly and frail elderly residents continue to need affordable housing options, accessible design modifications, and supportive services to support independent living, especially when elderly residents may place significant demands on both institutional and community-based long-term care services. Wilder Research also reports the need to offer multi-lingual and multi-cultural programs since many of Saint Paul's elderly residents are African American, Latino, and Asian-American, which was corroborated by the public engagement and consultation process. For cost-burdened homeowners, home improvement programs and community services, such as utility and rehabilitation assistance, may be needed for the elderly to maintain their homes. That said, cost-burdened renters will always need affordable rental housing. These needs were corroborated through the public engagement and agency consultation process with service providers.

**Housing and supportive needs for persons with Developmental, Physical, Mental Health Challenges, and Persons with Chemical Dependency:** There is a need for affordable housing with support services as well as community-based services and case management. The Minnesota Council on Disability also recommends affordable accessible-designed housing for physically challenged residents with limited incomes. Accessible-designed housing with support services can empower residents to achieve self-sufficiency. The State Mental Health Act encourages community integration for persons with mental health challenges. Affordable housing is a priority concern for individuals with serious and persistent mental illness, especially for those individuals on fixed income whose social security income is insufficient to pay rent. In addition to affordable housing, access to supportive services and treatment opportunities is important for those with mental illness. Persons with chemical dependency need supportive services, affordable sober housing, and safe haven for the chronically inebriated. These needs were corroborated through the agency consultation process.

**Housing and supportive needs for Persons with Limited English Proficiency (LEP):** Community development and social service organizations expressed that Saint Paul's new Americans and immigrant population can experience housing problems due to language barriers, vulnerable residency status, and lack of access to, or knowledge of, resources. Saint Paul's new Americans and newly arrived refugees

need stable affordable housing that is adequate for their family size, which may include accommodating multi-generational living. Since refugees and immigrants are simultaneously learning a new language, new culture, and marketable job skills, these residents need to be able to access housing information, programs, and services in their primary language. Increased culturally relevant outreach and programs are needed to ensure that these residents have equal opportunity to accessing facilities and services. In response, the City and community service providers have multi-lingual staff to provide resources and community organizations offer culturally relevant, multi-lingual support programs and services directed to these populations.

**Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:**

According to Minnesota Department of Health 2023 data, there are 1,137 residents living with HIV/AIDS in Saint Paul. According to the *2020 HIV/AIDS Comprehensive Needs Assessment* of people living with HIV in Minnesota and Minneapolis-St. Paul Transitional Grant Area conducted by the Hennepin County Public Health, Minnesota Department of Human Services, and the Minnesota Council for HIV/AIDS Care and Prevention, 17% of Minnesotans living with HIV reported to have unstable housing, which includes having unsafe and/or unaffordable housing and/or are homeless.

Persons living with HIV/AIDS often have lower incomes than the rest of the population. According to the *2020 HIV/AIDS Comprehensive Needs Assessment*, 41% of the Minnesotans living with HIV are living at or below the poverty level. An estimated 27% of Minnesotans living with HIV received emergency financial assistance and another 22% needed the service but did not access it. According to Saint Paul/Ramsey County CoC 2023 Point-in-Time data, there were 94 persons with HIV/AIDS that experienced homelessness. For medical reasons, persons living with HIV may have difficulty maintaining long-term employment.

Most importantly, persons with HIV/AIDS need affordable housing. Virtually, all adults receiving supplemental security income (SSI) benefits without government housing assistance would qualify 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.

**If the PJ will establish a preference for a HOME TBRA activity for persons with a specific category of disabilities (e.g., persons with HIV/AIDS or chronic mental illness), describe their unmet need for housing and services needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2) (ii))**

**Discussion:**

While the City of Saint Paul is aggressively providing financing for affordable housing and affordable supportive housing, the overall demand remains overwhelming. The City recognizes the diversity of its residents. Housing data for the City demonstrates that the greatest needs and highest housing priorities are affordability, choice, and supply. Consistent with the City's 2040 Comprehensive Plan – Housing Chapter, affordable housing priorities are: preservation and production of rental housing affordable for those at or below 30% of AMI; create homeownership opportunities for households with low and moderate incomes; housing preservation for low-income elderly homeowners between 0-50% of AMI; provide housing for special needs populations. During the next five years, the City will continue to serve low- and moderate-income residents by preserving existing affordable housing, increasing production of affordable housing units, supporting the development of wider variety of housing types to meet a continuum of housing needs. The City will continue to actively work with its partners to produce affordable housing and affordable supportive housing opportunities. The City, County, State, and community agencies are providing support services that encourage independent living, as needed, for persons with special needs.

## **NA-50 Non-Housing Community Development Needs – 91.215 (f)**

### **Describe the jurisdiction’s need for Public Facilities:**

Saint Paul has over 30 recreational facilities (which include senior centers, youth centers, and neighborhood facilities), 4,000 acres of parkland, more than 80 tot lots, a zoo and conservatory, four golf courses, and 13 library facilities located throughout the city. This property and assets require regular maintenance, periodic improvement, expansion, or replacement. Currently, 25 of the 42 recreation center buildings have been evaluated to be of poor quality. The Parks & Recreation Department has estimated the costs of its needed improvements to be approximately \$5.4 million each year to maintain their facility condition sustainability target, in addition to an approximate \$42 million backlog of deferred maintenance for those buildings.

Over the next five years, the Saint Paul Public Library foresees having significant capital improvement needs across its system (estimated \$15-20 million) for deferred maintenance, repairs, equipment replacement, and renovations. Major capital initiatives during this period are encompassed in the Transforming Libraries project which is comprised of construction of a new Hamline Midway Library and large-scale renovation at the Hayden Heights and Riverview Library locations, as well as system-wide technology upgrades and development of dynamic play and learn spaces for youth and families.

The primary source for park and library capital investments is property taxes, but CDBG funding is also used for capital investments in 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.

### **How were these needs determined?**

Each City of Saint Paul department is responsible for assessing its needs. The Parks and Recreation Department worked with a consultant throughout 2022-2023 to develop the City of Saint Paul Parks and Recreation System Plan, which was largely based on community and stakeholder input, policy direction from the City’s 2040 Comprehensive Plan, and innovative research and analysis. Adopted in 2023 with the intended implementation of recommendations for 2024 onwards, this plan serves as a comprehensive guide to physical improvements and modifications to parks, athletic fields, recreation centers, trails and other parks and recreation facilities. In addition, the Department continues to utilize the data to inform capital investment decision-making from the comprehensive asset management study that was completed in 2018 and included an assessment of the current condition of every facility/asset owned by the department and a list of needs with costs for each asset over the next 30 years.

After an extensive community and professional engagement effort, the Saint Paul Public Library adopted the 2024-2027 Strategic Direction to guide the department’s work for the next four years. The department engaged a consultant to develop a Facilities Master Plan. Completed in 2020, the Plan

analyzes how the facilities can best meet programmatic, community, and workflow needs and address structural, design and physical needs for all buildings, grounds, furnishings, and signage. The Plan includes recommendations, priorities, and cost estimates for implementation through 2025.

**Describe the jurisdiction’s need for Public Improvements:**

The City owns and maintains \$3 billion worth of infrastructure, including more than 1,874 miles of streets, 806 miles of sanitary sewer, 450 miles of storm sewer, 107 bridges, and 229 miles of bike lanes. The repair and replacement of this infrastructure is very important to the City, and these types of improvements are predominantly financed with several 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.

**How were these needs determined?**

The Department of Public Works relies heavily on the CIB process to finance its capital plan. The CIB budget is prepared on bi-annual basis. The CIB committee is comprised of 18 Saint Paul citizens representing each of the Minnesota senate districts located in Saint Paul. The committee is charged with hearing project proposal presentations, scoring projects, and offering comments. After review and public hearing, the CIB Committee makes recommendations to elected officials on capital investments over the next two years. These recommendations are transmitted to the Mayor for review and approval by the City Council. The CIB Committee also reviews community partner requests for sub-recipient grants of CDBG funds.

The Department of Public Works has established a five-year plan that is updated and reviewed annually. Public Works has established criterion for inclusion of road improvement projects into the five-year plan. This criterion relies on the pavement condition index score of the road, the average daily traffic, maintenance demand and the age of the street. Other considerations include adjacent development, safety concerns, utility work, small area plans, bike plan and matching funds from other sources.

**Describe the jurisdiction’s need for Public Services:**

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 a significantly greater need for these types of activities in Saint Paul than the City/County collaboration can provide, City funding is also used (including traditionally up to 15 percent of CDBG funds) to provide additional public services for 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. Based on the comments received through the Consolidated Plan agency consultation and public engagement process, the City is also seeing a need for bilingual and culturally relevant services, service-enriched housing, home buyer education, tenant and landlord education and counseling, additional youth services, and better coordination between agencies to allow for greater access to information for residents and business owners.

### **How were these needs determined?**

The City of Saint Paul is divided into 17 defined districts. Each of these districts is represented by a separate 501(c)3 organization known as a District Council. The City of Saint Paul contracts with these organizations for planning and advising on the physical, economic, and social development of their areas; identifying needs; initiating community programs; recruiting volunteers; and sponsoring community events. The City consults with these groups regularly, and additionally reached out as part of the Consolidated Plan development process in November and December 2024, specifically to weigh in on the needs and priorities of their districts. The results of the online survey also revealed public service needs.

City staff also consulted with City Departments, several public service providers, community organizations, and agencies, including Ramsey County, on the status of their current levels of services, unmet needs, and projected needs for the communities they serve.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

The Market Analysis of the Consolidated Plan focuses on the following areas:

- Number and type of housing units within the City;
- Cost of housing;
- Condition of housing;
- Public and assisted housing;
- Homeless facilities and services;
- Special needs facilities and services;
- Barriers to affordable housing;
- Non-housing community developments assets; and
- Needs and market analysis discussion.

## MA-10 Number of Housing Units – 91.210(a)&(b)(2)

### Introduction

Saint Paul has a traditional housing stock that consists of single-family detached homes, single-family attached homes, including townhomes and twinhomes, as well as multi-family housing that includes duplexes, triplexes, apartments, and condominiums. According to 2020 ACS five-year data, Saint Paul’s one-unit detached housing (single-family homes), accounts for 49% of the housing units in the city while low-density housing with 2-4 dwelling units only accounts for 10% (down from 12% five years ago). Seventy percent of the ownership units are three or more bedrooms, while one-bedroom apartments represent 37% and two-bedroom apartments represent 32% of the rental units. Only 20% of rental units have three or more bedrooms. Saint Paul’s housing suppl increased by about 1,500 units over the last decade, the population grew by over 10,000 in about that same time frame (2011-2015 ACS, 2016-2020 ACS).

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	59,755	49%
1-unit, attached structure	5,440	4%
2-4 units	12,735	10%
5-19 units	14,470	12%
20 or more units	29,015	24%
Mobile Home, boat, RV, van, etc.	470	0%
<b>Total</b>	<b>121,885</b>	<b>100%</b>

**Table 27 – Residential Properties by Unit Number**

Data Source: 2016-2020 ACS

### Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	460	1%	5,760	10%
1 bedroom	2,605	4%	20,860	37%
2 bedrooms	14,735	25%	18,125	32%
3 or more bedrooms	40,740	70%	11,455	20%
<b>Total</b>	<b>58,540</b>	<b>100%</b>	<b>56,200</b>	<b>99%</b>

**Table 28 – Unit Size by Tenure**

Data Source: 2016-2020 ACS

**Describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs.**

According to information maintained by HousingLink, a Twin Cities-based non-profit housing advocacy organization, accessed in November 2024, there are 519 properties, including public housing, that have received federal, state, or local financial assistance in Saint Paul. Of the 22,840 housing units at these properties, 19,675 are affordable: 6,379 units for households earning up to 30% of AMI, 3,532 units for up to 50%, 9,141 units for up to 60%, and 593 units for up to 80%. Of the housing units that report the unit type, approximately 9% are efficiencies, 53% are one-bedrooms, 28% are two-bedrooms, 9% are three-bedrooms, and 1% are four- or more bedrooms.

**Provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts.**

According to HousingLink data accessed in November 2024, Saint Paul has approximately 1,485 affordable units that could be lost between 2025 and 2029 from the affordable housing and rent subsidized inventory due to the expiration of contractual affordability requirements or Section 8 contracts. This assessment only represents those units that could potentially be lost due to contract expiration. According to the information maintained by HousingLink, there are six LIHTC-funded housing developments with earliest affordability contractual release between these dates. These properties contain 914 units of affordable housing—40 affordable units for households up to 30% AMI and 874 units for households up to 60% of AMI. HousingLink data identifies five developments that have 611 project-based Section 8 vouchers with contracts set to expire between 2025 and 2029. The City and Minnesota Housing are working and will continue to work with property managers and owners to preserve these affordable and rent-subsidized units.

**Does the availability of housing units meet the needs of the population?**

The available housing units do not meet the overall needs of the population. Overall, the housing units that have the adequate space to accommodate larger households are ownership units while the supply of larger rental units is limited. The converse is true for smaller households, where small rental units are ample, but small ownership units are limited. The CHAS data does not break out available senior housing opportunities or housing that has been designed for the needs of individuals with physical disabilities. Throughout the citizen engagement and agency consultation process, consultation groups identified a need for units that can accommodate low-income households, seniors, and residents needing services and support. Groups also highlighted a need for housing that would allow seniors to age in place. Affordable homeownership opportunities and affordable rental units were also indicated as highly needed.

### **Describe the need for specific types of housing:**

Since the City's population continues to grow, there is a need for all types and sizes of affordable housing. Specifically, there is a need for affordable homeownership units for small families and seniors who want to age in place, as only 4% of the ownership units are 1-bedroom units and 25% are 2-bedroom units. According to 2016-2020 CHAS data, only 46% of small family households earn up to 80% HAMFI and only 67% of large family households earn up to 80% HAMFI. There is a need for more affordable homeownership units that accommodate large families. There is also a need for affordable rental units for larger families, as only 20% of rental units are 3-bedroom units. Larger units are also needed to accommodate multi-generational families with elderly persons living in the household. Universally-designed, affordable, rental and ownership housing is needed for those with disabilities and the growing number of seniors who desire to age in place.

### **Discussion**

The City recognizes the need for more affordable housing units and a diverse stock of housing types to accommodate changing household demographics. The existing housing stock does not meet the overall needs for the population and there is a need for both affordable rental and homeownership units to accommodate small and large families, those with disabilities, and seniors.

## MA-15 Housing Market Analysis: Cost of Housing - 91.210(a)

### Introduction

As described in Section NA-10 of this Plan, one of the predominate housing-related problems in Saint Paul is the cost of housing for its extremely low- to moderate-income households. According to the HUD-reported 2009 Census and 2016-2020 ACS data, the median home value increased by 25% and median rent increased by 22%, while median household income increased by 22%. Although the 2016-2020 estimates were the most recent data provided by HUD, a review of more recent 2018-2022 ACS data reveals an increase in median home value since 2020 to \$264,900 and median rent since 2020 to \$1,174.

This section examines housing cost, rent paid, housing affordability, and monthly rents paid through federal programs.

### Cost of Housing

	Base Year: 2009	Most Recent Year: 2020	% Change
Median Home Value	173,900	217,100	25%
Median Contract Rent	757	925	22%

**Table 29 – Cost of Housing**

**Data Source:** 2000 Census (Base Year), 2016-2020 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	8,385	14.9%
\$500-999	25,330	45.1%
\$1,000-1,499	16,265	28.9%
\$1,500-1,999	4,525	8.1%
\$2,000 or more	1,705	3.0%
<b>Total</b>	<b>56,210</b>	<b>100.0%</b>

**Table 30 - Rent Paid**

**Data Source:** 2016-2020 ACS

### Housing Affordability

Number of Units affordable to Households earning	Renter	Owner
30% HAMFI	7,265	No Data
50% HAMFI	25,135	6,100

Number of Units affordable to Households earning	Renter	Owner
80% HAMFI	43,995	20,800
100% HAMFI	No Data	29,095
<b>Total</b>	<b>76,395</b>	<b>55,995</b>

**Table 31 – Housing Affordability**

Data Source: 2016-2020 CHAS

### Monthly Rent

Monthly Rent (\$)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	1,007	1,149	1,410	1,916	2,209
High HOME Rent	763	915	1,151	1,636	1,828
Low HOME Rent	763	915	1,125	1,300	1,450

**Table 32 – Monthly Rent**

Data Source: HUD FMR and HOME Rents

### Is there sufficient housing for households at all income levels?

There is not sufficient housing for households at all income levels in Saint Paul. The 2016-2020 CHAS data shows that there are only 7,265 rental housing units affordable to households earning 0-30% of AMI with 24,170 households at this income level. For owner-occupied housing, there is a lack of housing that is affordable to households earning 50% of AMI—approximately 6,100 ownership units are affordable to 17,885 households at 30-50% of AMI. This directly correlates to the significant number of households within these groups experiencing housing cost burden.

### How is affordability of housing likely to change considering changes to home values and/or rents?

According to the HUD-reported 2009 Census and 2016-2020 ACS data, the median home value increased by 25% and median rent increased by 22%, while median household income increased by 22% or 0.2% when adjusted for inflation. More recent 2018-2022 ACS data reports an increase in median home value by 22%, an increase in median rent by 27% and an increase in median household income of 17% between 2020 and 2022. With housing costs continuing to rise and wages not increasing at the same rate, housing cost burden is likely to continue to increase in Saint Paul over the next five years.

### How do HOME rents / Fair Market Rent compare to Area Median Rent? How might this impact your strategy to produce or preserve affordable housing?

According to HousingLink, the median rent for Saint Paul in November 2024 is \$1,516 for two-bedroom units and \$1,969 for three-bedroom units, which is \$106 and \$53 greater than HUD's fair market rates for a two-bedroom unit and three-bedroom unit, respectively. This indicates that naturally occurring affordable housing (NOAH) will be increasingly difficult to find and attention to the preservation of affordable housing, especially those units that are contracted with for affordable rents.

According to the 2020 ACS data, the median monthly rent was \$925, which most closely aligns to Fair Market Rent for an efficiency unit and HOME rents for a one-bedroom unit. As there are significantly fewer larger apartments with resulting higher rents, this information could indicate a need to preserve or create larger affordable units with more bedrooms.

## **Discussion**

The predominant housing-related problem in Saint Paul is housing cost burden. Over the last decade, median home values and rents have increased at a level greater than median household incomes are increasing. There is not sufficient housing for households all income levels, specifically rental units affordable to households earning 0-30% of AMI and owner-occupied units affordable to households earning 0-50% of AMI. With housing costs continuing to rise and wages not increasing at the same rate, housing cost burden is likely to continue to increase in Saint Paul over the next five years.

## MA-20 Housing Market Analysis: Condition of Housing – 91.210(a)

### Introduction

The housing portion of the housing and market analysis section provides an overview of the city of Saint Paul’s housing stock. The section examines condition and age of housing units, risk of lead-based paint exposure, and vacant or abandoned buildings and their suitability for rehabilitation. This analysis uses 2016-2020 ACS and CHAS data provided by HUD and vacant housing data generated by the City of Saint Paul’s Department of Safety and Inspections.

### Definitions

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 Condition but 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% of the appraised value of the property after rehabilitation.

The Condition of Units table below displays the number of housing units by tenure, based on the number of “selected conditions” the unit has. A selected condition refers to one of the following problems: (1) lacks complete plumbing facilities, (2) lacks complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%. Housing units with one or more selected conditions may be considered either "standard condition" or "substandard condition but suitable for rehabilitation".

### Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	12,465	21%	25,115	45%
With two selected Conditions	410	1%	2,835	5%
With three selected Conditions	15	0%	125	0%
With four selected Conditions	0	0%	4	0%
No selected Conditions	45,650	78%	28,125	50%
<b>Total</b>	<b>58,540</b>	<b>100%</b>	<b>56,204</b>	<b>100%</b>

**Table 33 - Condition of Units**

Data Source: 2016-2020 ACS

**Year Unit Built**

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	3,260	6%	6,250	11%
1980-1999	4,100	7%	8,710	16%
1950-1979	14,015	24%	21,955	39%
Before 1950	37,165	63%	19,280	34%
<b>Total</b>	<b>58,540</b>	<b>100%</b>	<b>56,195</b>	<b>100%</b>

**Table 34 – Year Unit Built**

Data Source: 2016-2020 CHAS

**Risk of Lead-Based Paint Hazard**

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	51,180	87%	41,235	73%
Housing Units build before 1980 with children present	4,310	7%	1,085	2%

**Table 35 – Risk of Lead-Based Paint**

Data Source: 2016-2020 ACS (Total Units) 2016-2020 CHAS (Units with Children present)

**Vacant Units**

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	367	22	389
Abandoned Vacant Units	NO DATA	NO DATA	NO DATA
REO Properties	NO DATA	NO DATA	NO DATA
Abandoned REO Properties	NO DATA	NO DATA	NO DATA

**Table 36 - Vacant Units**

**Alternate Data Source Name:** Vacant Properties

**Data Source Comments:** Saint Paul Vacant Building List, Saint Paul Open Information Portal, updated 12/27/2024. Class I and II shown under "Suitable for Rehabilitation". Class III shown under "Not suitable for Rehabilitation". Data is not available for Abandoned Vacant Units, REO Properties, and Abandoned REO Properties.

**Need for Owner and Rental Rehabilitation**

The data identifies a need for both owner and rental housing rehabilitation, which was corroborated by stakeholder input during the citizen participation process. The condition information provided through

the 2016-2020 CHAS data identifies that 22% of owner-occupied units and 50% of renter-occupied units have one of the selected conditions: (1) lacks complete plumbing facilities, (2) lacks complete kitchen facilities, (3) more than one person per room, and (4) cost burden greater than 30%. Only 1% of owner-occupied housing units and 5% of renter-occupied housing units have two or more selected conditions. It is estimated that most housing units with a selected condition have more than one person per room or a cost burden greater than 30% and that a very small number of housing units in Saint Paul suffer from the facilities deficits (e.g. lack of plumbing or complete kitchens) reported.

Age of the City's housing stock is an overall indicator for the ongoing need to focus on property maintenance efforts. Eighty-seven percent of owner-occupied units (primarily single-family homes) were built before 1980 with 63% being built before 1950. The age of the single-family housing stock coupled with the level of cost burden experienced by low-to-moderate income owners makes home maintenance issues critically important in the city. From a rental perspective, 73% of the units were built before 1980 with 34% built before 1950. The age and building type of buildings suggests that investments will need to be made in these units to provide decent rental housing stock into the future.

### **Estimated Number of Housing Units Occupied by Low- or Moderate-Income Families with LBP Hazards**

The City has 92,415 housing units that were built before 1980, indicating a Risk of Lead-Based Paint (LBP) Hazard. Approximately 68% of Saint Paul households are low- or moderate-income households earning up to 100% AMI; therefore, approximately, 63,000 of these 92,415 housing units are occupied by low- or moderate-income households.

### **Discussion**

As housing ages, it requires maintenance. If housing maintenance is deferred, it can lead to a decline in the city's housing stock. While maintenance is generally a good investment for property owners, major rehabilitation can sometimes cost more than it adds to the property value. This can create an economic disincentive for property owners to make substantial repairs to older properties. Another concern is that many households cannot afford maintenance for their properties, especially expensive major rehabilitations that may be required. There are both City and community housing rehab programs available with a variety of financial options to assist, many utilizing CDBG funds.

## **MA-25 Public and Assisted Housing – 91.210(b)**

### **Introduction**

The Saint Paul Public Housing Agency (PHA) is an important provider of affordable housing for thousands of Saint Paul households with the greatest need (households at or below 30% of AMI). The PHA owns and manages 418 public housing units and 3,836 units with Project-Based Rental Assistance (PBRA) that were converted from public housing via HUD’s Rental Assistance Demonstration (RAD) program, effective January 1, 2020. The PHA also administers 5,243 Housing Choice Vouchers (as of January 2025). These include 175 Family Unification Program (FUP) vouchers, 318 Mainstream Program/Disability vouchers, 276 Veterans Affairs Supportive Housing (VASH) vouchers and 157 Emergency Housing Vouchers (EHV). PHA has allocated 864 project-based vouchers (PBVs); and more than half of those (510) are in supportive housing developments. In total, the PHA provides over 9,500 affordable homes to more than 21,000 people.

Saint Paul PHA strives to provide excellent property management and maintenance for 16 hi-rises, 4 family housing developments and its 418 scattered site homes. Saint Paul PHA has strict but fair standards for its rental leases. Saint Paul PHA prepares its vacant units to high standards for each new resident. All emergency work orders are performed within 24 hours, and routine work orders in less than three days on average. All apartments are inspected at least twice annually to ensure local codes and HUD's standards are met. Saint Paul PHA's excellent property management and maintenance helps to maintain and improve the city's housing stock and promote neighborhood stability. Saint Paul PHA provides community policing in coordination with the Saint Paul Police Department, assisted living services for frail elderly and disabled residents, and others.

Effective January 1, 2020, most of the public housing units converted, debt-free, to HUD’s Project-Based Rental Assistance (PBRA) program via HUD’s Rental Assistance Demonstration (RAD). The conversion does not constitute “privatization of public housing”, because the PHA continues to own, manage, maintain and improve those former public housing units through long-term PBRA contracts. The initial 20-year contracts, by law, must be renewed; this ensures that the units remain permanently affordable to low-income households. Residents continue to pay 30 percent of their adjusted income towards the rent and will retain the same basic rights as living in PHA-owned housing. The primary benefit is more predictable, reliable funding.

## Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
				Veterans Affairs Supportive Housing	Family Unification Program	Disabled *			
# of units vouchers available	0	0	418	5243	864	4,379	276	175	318
# of accessible units	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
<b>*Includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 37 – Total Number of Units by Program Type**

Data Source: PIC (PIH Information Center)

### Describe the supply of public housing developments:

### Describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan:

The Saint Paul PHA owns and manages a total of 4,273 units comprised of 2,553 hi-rise units (including 19 special purposes units that house police officers or support services offices) and 1,720 family units (both now in Project-Based Rental Assistance/PBRA), and 418 scattered site single family houses and duplexes (still public housing). As explained below, 3,836 former public housing units were converted to PBRA via HUD’s Rental Assistance Demonstration (RAD) effective January 1, 2020.

All the PHA’s public housing and PBRA units are in good to excellent physical condition. The PHA has consistently achieved "High Performer" status under HUD's Public Housing Assessment System and a “Superior” rating in the initial HUD Management and Occupancy Review (MOR) in the Multifamily program. Saint Paul PHA properties continue to be managed to the highest possible standards, including thorough and uniform applicant eligibility determination, fair lease enforcement, regular preventative maintenance, prompt responses to maintenance work orders,

full occupancy, timely turnover of vacant units, and accurate reporting of financial data and all other components of quality property management and maintenance.

Many PHA units have been improved over the last five years, including the following:

- From 2020-2025, the PHA has completed 244 vacant unit modernizations in public housing units, which have included projects such as kitchen and bathroom remodels, electrical and plumbing upgrades, flooring replacements, and painting. Additionally, the PHA has completed capital improvements including siding replacements at 10 units, window replacements at 81 units, roof replacements at 113 units, retaining wall replacements at 28 units, driveway replacements at 19 units, and furnace/boiler replacements at 90 units.
- Installation of new plumbing at Front Hi-Rise (151 units).
- Exterior modernization of family dwelling units at Mt. Airy Homes. As of 12/31/2021, all 273 units in 91 buildings have been completed.
- Elevator modernization at Edgerton Hi-Rise, Valley Hi-Rise, Exchange Hi-Rise, Neill Hi-Rise, Central Hi-Rise, Cleveland Hi-Rise, and Dunedin Hi-Rise.

In addition to HUD funding, the PHA received financial assistance for these projects from the Minnesota Housing Finance Agency and the Federal Home Loan Bank of Des Moines.

**Public Housing Condition**

Public Housing Development	Average Inspection Score
Scattered	96b

**Table 38 - Public Housing Condition**

**Describe the restoration and revitalization needs of public housing units in the jurisdiction:**

The PHA’s 5-Year Capital Plan identifies how the PHA will renovate/modernize public housing units (using HUD Capital Fund Program (CFP) grants). The emphasis is on improvements for life safety and residents’ quality of life. The PHA plans to start rehabilitation of the PHA’s Central Duplex development, including roofing replacement, window replacement, exterior repairs, kitchen and bathroom modernization, new flooring and doors, plumbing upgrades, unit painting, concrete sidewalk replacements, landscaping and playground improvements. Staff plan to perform the Central Duplex Modernization work in multiple phases using a portion of each future CFP grant until all the work is complete.

The PHA also plans to continue to complete capital improvements at scattered site during unit vacancy. These projects vary based on the individual needs of the property and include things like kitchen and bathroom remodels, electrical and plumbing upgrades, and the replacement of flooring, siding, windows, roofs, retaining walls, driveways, and furnace/boilers replacements.

The PHA has maintained its High Performer status under HUD’s Public Housing Assessment System (PHAS) for 32 consecutive years.

As stated above, the Saint Paul PHA has converted most of its public housing units with traditional Capital Fund subsidies and Operating Fund subsidies to a long-term contract with HUD under the Project-Based Rental Assistance (PBRA) program.

**Describe the public housing agency's strategy for improving the living environment of low- and moderate-income families residing in public housing:**

- Saint Paul PHA promotes fire safety and life safety as well as preserving the asset of public housing facilities. Saint Paul PHA maintains high quality and timely design, bidding and construction utilizing “green and sustainable” principles to conserve energy and water while protecting the environment to the greatest possible.

Furthermore, as part of its Capital Fund Program (CFP) Action Plan, Saint Paul PHA consults with its staff, residents, PHA Resident Advisory Board, PHA’s Hi-Rise President’s Council, and individual Resident Councils to inform them how Saint Paul PHA is using its Capital Fund Program funds; seek their input for future grant applications; and provide updates on ongoing and upcoming CFP work.

**Discussion:**

**Public Housing:** The Saint Paul PHA owns and manages a total of 4,273 units comprised of 2,553 hi-rise units (including 19 special purposes units that house police officers or support services offices) and 1,720 family units (both now in Project-Based Rental Assistance/PBRA), and 418 scattered site single family houses and duplexes (still public housing). As explained below, 3,836 former public housing units were converted to PBRA via HUD’s Rental Assistance Demonstration (RAD) effective January 1, 2020.

The PHA’s rental units are consistently fully occupied (over 99%). Saint Paul PHA has maintained its “High Performer” status under HUD’s Public Housing Assessment System (PHAS) for 29 consecutive years. Saint Paul PHA manages its properties to the high standards, including thorough and uniform applicant eligibility determination, fair lease enforcement, regular preventative maintenance, prompt response to maintenance work orders, full occupancy and timely turnover of vacant units, timely and accurate reporting of financial data, and all other components of quality property management and maintenance.

Saint Paul PHA follows its Five-Year Action Plan and an annual plan to use its HUD Capital Fund Program (CFP) grants, approximately \$11 million annually prior to the RAD conversion, to maintain and to renovate its family and hi-rise apartments. Similar work will continue in the PBRA buildings and units using Housing Assistance Payment (HAP) funding. The work includes creating new hi-rise community rooms and kitchens, and enlarging community centers on PHA family housing developments.

Still, it is important to note that Saint Paul PHA needs stable federal funding to maintain its High Performer status. The PHA anticipates that the PBRA-HAP funding will provide that stability and predictability, that was lacking in public housing.

**Publicly-Assisted Affordable Housing:** For non-Saint Paul PHA housing, the City provides financing for the preservation, renovation, or new construction of rental housing affordable at or below 60% of area median income – using a combination of financing, including low-income housing tax credits, federal funds including CDBG and HOME, state housing dollars, City TIF, and other City funds. Still, with limited

financial capacity, the City must partner with HUD, Minnesota Housing Finance Agency, and private foundations to finance affordable housing developments.

It should also be noted that the City needs stable federal funding, such as CDBG and HOME, to construct and preserve affordable housing in Saint Paul.

## MA-30 Homeless Facilities and Services – 91.210(c)

### Introduction

### Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	439	NO DATA	278	828	NO DATA
Households with Only Adults	204	NO DATA	292	849	NO DATA
Chronically Homeless Households	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Veterans	NO DATA	NO DATA	NO DATA	NO DATA	NO DATA
Unaccompanied Youth	15	NO DATA	21	0	NO DATA

**Table 39 - Facilities and Housing Targeted to Homeless Households**

**Data Source:** Ramsey County Housing Inventory Count (HIC), MN HMIS

**Describe mainstream services, such as health, mental health, and employment services to the extent those services are used to complement services targeted to homeless persons**

To ensure full range of services, without duplication, Saint Paul has a coalition of community services including HousingLink, Ramsey County Family Homelessness Prevention Assistance Program Advisory Committee, Ramsey County Continuum of Care (CoC), and affordable supportive housing providers. The City of Saint Paul, in partnership with Ramsey County is launching the new “Familiar Faces” Programming to further coordination along with the City’s Homeless Assistance Response Team.

**Short Term Emergency Financial Assistance for rent, utility payments or other emergencies which threaten the loss of housing:**

Agencies/Programs include: City of Saint Paul planning underway for new emergency rental assistance, Ramsey County Social Services, St. Paul Foundation – Community Sharing Fund, City of Saint Paul Mortgage Foreclosure Prevention Program, Sewer Abatement fund, Community Action Programs –utility assistance, Salvation Army Heat Share, HouseCalls, United Way.

**Homelessness Prevention Programs that assist households secure and maintain housing:**

Agencies/Programs include: Saint Paul Public Library Outreach, Saint Paul Home Rehab Loan Programs, Dispute Resolution Center, Southern Minnesota Regional Legal Services (SMRLS) legal representation (tenant/rights, fair housing, emergency assistance).

**Homelessness Prevention Services that address basic needs:**

Food: Community Food pantries, CAP-utility assistance, free meals at Saint Paul Opportunity Center, Neighborhood House and faith communities.

Health Care: Health service programs include Community Clinics in Saint Paul such as Minnesota Community Care (formerly West Side Community Health Services), Open Cities Health Center, United Family Medicine, and Family Tree Clinic. These facilities can provide primary and preventative care, mental health services, and dental services to people who experience barriers to care, including those who experience homelessness. Programs through these clinics also include health screenings at the City’s emergency shelters. AIDS and STD testing and treatment are provided by area organizations, including Family Tree Clinic, Face to Face Clinic, JustUs Health, and Saint Paul - Ramsey County Public Health. Health Care for the Homeless provides medical services to homeless residents. Saint Catherine University Master of Nursing-Entry Level Nursing students conduct supervised in-home services to residents of the YWCA Saint Paul’s transitional housing program.

Furniture Programs: Goodwill, St. Vincent de Paul, Disabled Americans, Bridging.

Personal Care: Showers and laundry services at Saint Paul Opportunity Center and Health Care for the Homeless.

Job and Employment Training: Ramsey County Workforce Solutions, City's Right Track summer youth program, Goodwill Industries (employment and training).

Educational: Saint Paul Public Schools Title 1 partners with many community agencies to ensure that homeless students are transported to their school of origin. Additionally, Title 1 provides some tutoring and related educational services to children living in transitional housing.

Mental Health Services: Ramsey County Community Services, RADIAS Health (formerly South Metro Human Services), MN Department of Human Services, Adult Rehabilitative Mental Health Services (ARMHS).

**List and describe services and facilities that meet the needs of homeless persons, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. If the services and facilities are listed on screen SP-40 Institutional Delivery Structure or screen MA-35 Special Needs Facilities and Services, describe how these facilities and services specifically address the needs of these populations.**

**Homeless Adults:** There is a constant need for emergency shelter beds for homeless individuals as well as supportive services, including permanent supportive housing opportunities and medical respite.

The City and Ramsey County currently partners with 3 single adult shelter providers (Catholic Charities, Higher Ground Shelter, Model Cities, Safe Space Shelter, and Union Gospel Mission. Ramsey County partners with 2 family shelter providers (Catholic Charities, Family Service Center and Beacon Interfaith, Provincial House. Shelter Capacity is typically full and as a result unsheltered homelessness is increasing in Ramsey County. Ramsey County CoC is working to strengthen service delivery offered at traditional homeless service shelters and day centers and offer new programs such as Familiar Faces. The Familiar Faces program will serve individuals who are frequent utilizers of emergency response and who have not been served well in traditional emergency response settings. Familiar Faces will provide personalized, intensive support and service connection to address the unique needs of everyone within the "Familiar Faces" group.

**Homeless Families:** There is a constant need for emergency shelter beds for homeless families in addition to transitional housing, permanent supportive housing, and domestic violence facilities. Wilder Research (*Homelessness in Minnesota - 2015 results*, November 2016) reports that almost half of all homeless children are age 5 or younger and 78% of homeless families with children are single parent-headed households. Family homelessness is often considered to be caused by a shortage of affordable rental housing and by poverty. The federal monthly Temporary Assistance to Needy Families (TANF), implemented locally as the Minnesota Family Investment Program (MFIP), cash allowances have not increased since 1986 and are insufficient to pay for a modest apartment. Homeless families often are

more vulnerable due to the lack of job skills and employment, domestic violence, and mental health issues and often require a continuum of services provided in a structured, supportive setting.

The City, working in collaboration with Ramsey County, allocates ESG funds to various organizations, such as Catholic Charities - Family Service Center, the YWCA transitional housing, and the YWCA rapid re-housing for families. Theresa Living Center transitional housing also assists single women and single-parent families, and Lutheran Social Services Life Haven provides transitional housing for teenaged parents. In addition, the City has provided capital funding to Casa Guadalupana for building improvements, and is currently working with YWCA St. Paul to fund capital improvements for transitional housing for families.

**Homeless Youth:** There is a constant need for culturally-sensitive and age-appropriate emergency shelter beds for homeless youth. Wilder Research Center and homeless youth service providers recognize that official numbers of homeless youth significantly under-represent the total number of youths who are experiencing homelessness since homeless youth often “couch-hop” or stay temporarily with an acquaintance or relative. This is partly due to the lack of youth-specific shelters and housing programs.

The City allocates ESG funds to Lutheran Social Services Safe House (emergency youth shelter), Salvation Army Booth Brown House (emergency youth shelter), and Face to Face *Safe Zone* (drop-in center and rapid re-housing services for homeless youth).

## MA-35 Special Needs Facilities and Services – 91.210(d)

### Introduction

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

- Elderly
- Frail Elderly
- Persons with Physical Challenges
- Persons with Developmental Challenges
- Persons with Mental Health Challenges
- Persons with Chemical Dependency Issues, such as alcohol or other drug addictions
- Persons with HIV/AIDS and their families
- Public Housing residents

**Including the elderly, frail elderly, persons with disabilities (mental, physical, developmental), persons with alcohol or other drug addictions, persons with HIV/AIDS and their families, public housing residents and any other categories the jurisdiction may specify, and describe their supportive housing needs**

Saint Paul elderly and frail elderly residents need accessible design modifications and supportive services to support independent living, especially when elderly residents may place significant demands on both institutional and community-based long-term care services. Legislative directives (Olmstead decision) require that special needs residents seek independent living arrangements. Thus, there is a need for affordable housing with support services, including affordable accessible-designed housing for physically challenged residents, supportive housing programs for persons with mental health challenges, and sober housing and safe haven "Housing First" programs for chronically-inebriated. In Saint Paul, there are a wide variety of housing options ranging from independent living and housing with support services, such as, but not limited to:

- **Independent living** (housing with support services).
- **City's Home Rehab Programs** (home improvements, energy conservation, accessibility).

- **Minnesota Homeownership Center’s (MNHOC) Mortgage Counseling** (explains reverse mortgages).
- **Affordable Rental Housing** (publicly-assisted affordable housing).
- **ADA-designed housing** (accessible units in compliance with ADA).
- **Saint Paul PHA's Assisted Living Programs** (PHA-Congregate Housing Services and PHA/Wilder Assisted Living Program that assist frail or disabled residents at risk of nursing home placement). Payment is made by client reimbursement, Alternative Care, Elderly Waiver funds and/or Minnesota Supplemental Assistance.
- **PHA /Accessible Space New Beginnings - Brain Injury Program** (24-hour personal care attendant service and support services for residents who sustained brain injuries).
- **PHA /Accessible Space, Inc.** (housing with 24-hour personal care attendant service and support services for residents with mobility impairments and/or complications from diabetes).
- **HUD Section 811 Program** (service-enriched housing for older adults and physically-challenged residents so they can live more independently).
- **Congregate living facilities and assisted living facilities** (private market and affordable congregate living facilities-service-enriched housing for older adults and younger disabled persons).
- **Nursing facilities** (long-term care facilities providing nursing services, rehabilitative care and assistance meeting daily living needs of individuals with physical disabilities).
- **State of Minnesota Home and Community-Based Services (HCBS) waiver programs** (environmental modifications and housing placement assistance).
- **Case management services** (Ramsey County Social Services provides case management services to residents with developmental disabilities, residents with chemical dependency, residents with mental health challenges).
- **ARC Minnesota** (services to persons with developmental disabilities).
- **CBDG-funded Block Nurse Program**

**Describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing**

The City of Saint Paul is launching its new Familiar Faces programming, which focuses on providing shelter and services for those cycling in and out of institutional settings. Ramsey County Social Services provides supportive services to individuals with mental illness. For residents leaving mental health treatment facilities, there are some housing subsidies being administered by the County with its partners, including RADIAS Health (formerly South Metro Human Services), Mental Health Resources, and Guild, Inc. Ramsey County Continuum of Care works closely with County staff and State Department of Human Services to ensure that there are housing solutions in place before a resident is discharged from a mental health treatment facility. Additionally, the Saint Paul Opportunity Center features partner

organizations, such as Catholic Charities, Ramsey County, and Minnesota Community Care, to provide physical, mental and chemical healthcare services, housing search and placement services, access to Veteran's benefits, SNAP, Medical Assistance, and other supports. The County also administers the state-funded Housing Support Program, which aims to reduce and prevent people from living in institutions or becoming homeless.

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.

**Bridges Rental Assistance Program:** Bridges, a statewide program, 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.

**Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. 91.315(e)**

Saint Paul has residents that are not homeless but have special needs that require supportive services to allow them to remain in their current housing situations or find supportive housing. While Ramsey County is the primary provider of most social services, the City will continue to provide funding for public services, including supportive services that assist those with special needs. Additionally, the City finances multi-family affordable housing developments that must also comply with ADA requirements - which provides additional opportunities for persons with physical challenges. It is anticipated that the City will continue to do so during the next year. The City is also continuing to explore options for supportive housing with community agencies and may be working with private housing developers and non-profit housing developers to develop senior housing alternatives. Goals of this Consolidated Plan include Development of New Housing, which includes housing for special needs and Public Services, which includes supportive services.

**For entitlement/consortia grantees: Specify the activities that the jurisdiction plans to undertake during the next year to address the housing and supportive services needs identified in accordance with 91.215(e) with respect to persons who are not homeless but have other special needs. Link to one-year goals. (91.220(2))**

Saint Paul has residents that are not homeless but have special needs that require supportive services to allow them to remain in their current housing situations or find supportive housing. While Ramsey County is the primary provider of most social services, the City will continue to provide funding for public services, including supportive services that assist those with special needs. Additionally, the City finances multi-family affordable housing developments that must also comply with ADA requirements - which provides additional opportunities for persons with physical challenges. It is anticipated that the City will continue to do so during the next year. The City is also continuing to explore options for supportive housing with community agencies and may be working with private housing developers and non-profit housing developers to develop senior housing alternatives. Goals of this Consolidated Plan include Development of New Housing, which includes housing for special needs and Public Services, which includes supportive services.

## **MA-40 Barriers to Affordable Housing – 91.210(e)**

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

Housing data for Saint Paul demonstrates that the greatest needs and highest housing priorities are affordability, choice, and supply. Consistent with the City’s 2040 Comprehensive Plan-Housing Chapter, affordable housing priorities include preservation and production of rental housing affordable for those at or below 30% of AMI; create homeownership opportunities for households with low and moderate incomes, 60-80% AMI; housing preservation for low-income elderly homeowners between 0-50% of AMI; provide housing for special needs populations.

The 2040 Comprehensive Plan supports affordable housing development and Policy H-32 states “Continue to use City/HRA resources to support affordable rental housing citywide with at least 30 percent of the total rental units (both market-rate and affordable) financially assisted by the City/HRA being affordable to households earning 60 percent or less of AMI with at least: 10% of all units being affordable to households earning 30% of AMI; 10% of all units being affordable to households earning 50% of AMI; and 10% of all units being affordable to households earning 60% of AMI.”

The most significant barriers for households securing affordable housing units are insufficient income and the lack of affordable housing units. The greatest gap in affordable housing units is for household with income below 30% AMI. Not only is the supply of units few, but many of the units are occupied by households that could afford a unit at a higher rent. Barriers for developing affordable housing include high costs and lack of funding and available land in a built-up city. While some of the barriers to producing affordable housing are beyond the control of local government, local policies like regulatory codes, fees, and zoning regulations may hinder the development of or increase the cost of housing.

From a financing perspective, affordable housing development requires multiple funding sources including the City local funds, TIF LIHTC, State dollars, federal funding from HUD (CDBG, HOME), and redevelopment property acquired and assembled by public entities. To keep pace with increasing demand for affordable housing and to balance development to ensure locational choice, continued federal and state funding is needed. The lack of sufficient funding and insufficient allocation of LIHTCs has negative bearing on the City's ability to provide and invest in affordable housing. The City receives only about 36% of the CDBG funding it received in 1975. Similarly, the City receives about 75% of the HOME funding it received in 2000. The City’s LIHTC allocation also continues to shrink.

## MA-45 Non-Housing Community Development Assets – 91.215 (f)

### Introduction

This section discusses the non-housing community development assets and needs in terms of employment sectors and business activity, workforce and infrastructure needs, workforce training initiatives, and economic development initiatives. The City of Saint Paul works to support businesses that create jobs and ensure that city residents are competitive for those jobs. This work is funded with a combination of discretionary City dollars and state and federal funding, including CDBG funds for eligible activities.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	389	73	0	0	0
Arts, Entertainment, Accommodations	16,582	17,355	13	12	-1
Construction	3,286	4,676	3	3	1
Education and Health Care Services	33,249	53,578	26	37	11
Finance, Insurance, and Real Estate	9,601	13,644	7	9	2
Information	2,795	3,402	2	2	0
Manufacturing	12,155	7,556	9	5	-4
Other Services	5,352	7,033	4	5	1
Professional, Scientific, Management Services	15,790	11,788	12	8	-4
Public Administration	0	0	0	0	0
Retail Trade	11,838	10,402	9	7	-2
Transportation and Warehousing	3,816	1,382	3	1	-2
Wholesale Trade	4,825	6,517	4	5	1
Total	119,678	137,406	--	--	--

**Table 40 - Business Activity**

**Data Source:** 2016-2020 ACS (Workers), 2020 Longitudinal Employer-Household Dynamics (Jobs)

## Labor Force

Total Population in the Civilian Labor Force	166,235
Civilian Employed Population 16 years and over	157,990
Unemployment Rate	4.97
Unemployment Rate for Ages 16-24	15.17
Unemployment Rate for Ages 25-65	3.38

**Table 41 - Labor Force**

Data Source: 2016-2020 ACS

Occupations by Sector	Number of People
Management, business and financial	43,570
Farming, fisheries and forestry occupations	6,820
Service	17,945
Sales and office	31,555
Construction, extraction, maintenance and repair	7,385
Production, transportation and material moving	7,710

**Table 42 – Occupations by Sector**

Data Source: 2016-2020 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	95,529	71%
30-59 Minutes	33,739	25%
60 or More Minutes	5,169	4%
Total	134,437	100%

**Table 43 - Travel Time**

Data Source: 2018-2022 ACS

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	10,230	745	8,955
High school graduate (includes equivalency)	22,890	1,455	8,075

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Some college or associate's degree	33,020	1,725	7,195
Bachelor's degree or higher	60,145	1,585	6,795

**Table 44 - Educational Attainment by Employment Status**

Data Source: 2016-2020 ACS

**Educational Attainment by Age**

	Age				
	18-24 yrs	25-34 yrs	35-44 yrs	45-65 yrs	65+ yrs
Less than 9th grade	460	2,206	3,189	4,473	3,680
9th to 12th grade, no diploma	2,920	1,670	2,116	2,207	883
High school graduate, GED, or alternative	7,781	9,143	8,561	15,311	8,890
Some college, no degree	13,860	6,719	8,337	9,879	8,188
Associate's degree	2,727	3,519	2,727	4,148	1,587
Bachelor's degree	5,284	19,390	8,721	15,792	8,409
Graduate or professional degree	376	8,483	10,733	13,696	7,969

**Table 45 - Educational Attainment by Age**

Data Source: 2018-2022 ACS

**Educational Attainment – Median Earnings in the Past 12 Months**

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	24,883
High school graduate (includes equivalency)	28,973
Some college or associate's degree	36,262
Bachelor's degree	50,134
Graduate or professional degree	67,921

**Table 46 – Median Earnings in the Past 12 Months**

Data Source: 2016-2020 ACS

**Based on the Business Activity table above, what are the major employment sectors within your jurisdiction?**

The major employment sectors include Education and Health Care Services (employs 33,249 employees), Arts, Entertainment, Accommodations (employs 16,582 employees), Professional, Scientific, Management Services (employs 15,790 employees), Manufacturing (employs 12,155 employees) Retail Trade (employs 11,838) and Finance, Insurance and Real Estate (employs 9,601 employees).

**Describe the workforce and infrastructure needs of the business community:**

The reported 2016-2020 ACS unemployment rate of 4.97% is outdated. The State of Minnesota Department of Employment and Economic Development (DEED) reports an unemployment rate for 3.1% in October 2024. This low unemployment rate means that businesses in growing sectors are having difficulties attracting and retaining talent. In Saint Paul, this low unemployment rate also masks racial disparities in unemployment. According to the 2022 ACS 5-Year estimates, the City's overall unemployment was 5.0%, while the unemployment rate was 8.2% for the Black or African Americans population and 16.5% for the American Indian and Alaska native population.

These disparities persist. The Metropolitan Council has identified Areas of Concentrated Poverty (ACP50) – Census Tracts where at least half of the residents are people of color and at least 40% of the residents live below 185% of the federal poverty line – and has committed to using its public resources to catalyze investment in these areas. Saint Paul's ACP50 areas show a concentration of the highest percentages by Census Block Group of households without a car, families living in poverty, non-English speaking households, severely cost-burdened households, and population 25 years and older with no bachelor's degree. The ACP50 areas also exhibit the lowest high school graduation rates in Saint Paul. The City's 2040 Comprehensive Plan supports the equitable geographic allocation of public funding and investment (especially for land use, housing, transportation, community wealth creation, public utilities and parks) to ensure that residents in these areas have the resources they need to thrive and prosper.

The State of Minnesota Department of Employment and Economic Development (DEED) Regional Industry Employment Projections for the Twin Cities Planning Region (accessed in December 2024) projects the greatest industry employment growth from 2022 to 2032 to occur in Health Care & Social Assistance (9.2% growth), Professional Services & Management of Companies (9.1% growth), Wholesale Trade (7.8% growth), Transportation & Warehousing (7.7% growth), and Information (7.7% growth)

Challenges for many of these growing industries relate to the availability of talent, skills, and competencies demanded by employers in the changing economy and technology growth. Labor shortages and racial disparities in training/educational outcomes also remain a challenge for the region, which can impact the ability to grow the regional economy in an inclusive way, sharing the benefits of increased prosperity. Employers need to revise hiring practices and increase well-rounded and representative employment. While academic institutions and training partners need to undertake initiatives to support different learning models and ongoing skill building.

In 2017, the City of Saint Paul launched a tech sector growth initiative called Full Stack that uses City funds for scholarships to low-income residents to tech credentialing programs with high replacement rates and significant increases in hourly wages. In other employment sectors, the City works with Ramsey County and other partner organizations to provide employment and training services to businesses and job seekers.

Infrastructure needs of businesses also continue to grow more complex and infrastructure ages. The need for optic fiber and other high-speed access to the internet connections and data analysis will continue to put pressure on existing systems. Other infrastructure needs of businesses include transit expansion, roadway and utility upgrades to aging infrastructure, freight transportation, and land development to support job growth and creation. Plans are underway for transit lines serving Saint Paul and the surrounding metro area, connecting workers to jobs more efficiently.

**Describe any major changes that may have an economic impact, such as planned local or regional public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.**

The City supports initiatives to provide business assistance and develop strategies aimed at building an environment where more innovative businesses can locate, start up, and continue to grow. Ongoing initiatives include:

**Full Stack** – A public/private partnership co-led by the City and St. Paul Area Chamber of Commerce, provides services to help tech/innovation sector businesses start-up/scale up and attract, retain, and expand tech/innovation jobs. Workforce Innovation and Opportunity Act (WIOA) dollars granted to Ramsey County have supported scholarships and wrap-around services since 2019. The State of MN has provided grant funds to augment City and Federal dollars, and the City is pursuing foundation funds as well.

**Minimum Wage Ordinance** – Sets the lowest hourly pay rate for work done in Saint Paul. The minimum wage varies based on a business's size and increases in phases. The City will require businesses of all sizes to pay their employees a minimum wage of \$15 an hour by 2027.

**Open for Business** – A one-stop shop for start-up and existing businesses to get information and leverage resources to starting a business in Saint Paul; connection with information and resources to start, move or expand a business; and help from a Business Project Facilitator as a guide through the permitting and licensing process of opening, expanding or moving to the City.

**Commercial Corridor Pilot Fund** – The HRA is exploring a more flexible new grant fund to advance the economic well-being of the City of Saint Paul by supporting commercial corridors

citywide. The fund will build capacity at business-support organizations to enhance their commercial corridors by planning events, marketing and promotion, supporting individual business needs, and making infrastructure or streetscape improvements.

**How do the skills and education of the current workforce correspond to employment opportunities in the jurisdiction?**

There is a need for a skilled and educated workforce in Saint Paul. There are eleven colleges and universities located within City boundaries, which are a strength of the region. However, despite very low unemployment rates overall in both Saint Paul and the region, unemployment rates are much higher and labor force participation rates are much lower for people of color. At the same time, employers have difficulty recruiting and retaining staff with the needed skills and job posting boards demonstrate tens of thousands of unfilled jobs at any given time.

The State of Minnesota Department of Employment and Economic Development (DEED) Twin Cities Planning Region Occupations in Demand data indicates a variety of in-demand occupations requiring different levels of education required, ranging from “less than high school” to “bachelor’s degree or higher”. However, many of the higher-income occupations require skills training and other educational programs. There is a general need to increase the number of people with bachelor’s degrees and two-year degrees (Associate’s and technical degrees) and skill credentialing programs.

**Describe any current workforce training initiatives, including those supported by Workforce Investment Boards, community colleges and other organizations. Describe how these efforts will support the jurisdiction's Consolidated Plan.**

Ramsey County is the lead agency that handles job training for Saint Paul. The City will continue to work with the County as its partner. The Workforce Innovation Board (WIB) of Ramsey County, a legislatively mandated Workforce Board that works to help maintain the economic health of Ramsey County, identifies current and emerging workforce issues and needs, creates partnerships to serve the needs of businesses and job seekers, and oversees publicly funded workforce programs in Ramsey County. Workforce services are offered by Ramsey County Workforce Solutions, the Minnesota Department of Employment and Economic Development (DEED), and a network of dedicated partner organizations. Workforce Solutions is overseen by the WIB and provides employment and training services to businesses and job seekers in Ramsey County. These efforts support the City’s Consolidated Plan by

providing thousands of Saint Paul residents with employment resources and job skill training. In 2023, Ramsey County Workforce Solutions provided service to 7,274 Saint Paul residents.

Other workforce training opportunities and business development services are available through Full Stack Saint Paul, Construction Careers Foundation, YWCA Saint Paul, Latino Economic Development Center, Neighborhood Development Center, local Chambers of Commerce and Trade Associations, as well as other community organizations and community colleges.

**Does your jurisdiction participate in a Comprehensive Economic Development Strategy (CEDS)?**

No.

**If so, what economic development initiatives are you undertaking that may be coordinated with the Consolidated Plan? If not, describe other local/regional plans or initiatives that impact economic growth.**

While not a CEDS, the goals identified in the 2040 Comprehensive Plan that focus on economic development includes efforts to improve the economic well-being and quality of life of a community by creating and/or retaining jobs and supporting or growing incomes and the tax base. In Saint Paul, economic development is a critical component of meeting our equity, diversity and growth goals, especially as we seek out innovative economic models for our culturally rich neighborhoods.

**Neighborhood STAR** - The Neighborhood STAR Program provides grants for physical (capital) improvement projects in Saint Paul neighborhoods. Projects must be neighborhood-based, designed in partnership with community stakeholders, and clearly address problems, needs and opportunities in Saint Paul. Proposals can be for either a project or program that results in capital improvements in Saint Paul. Innovative proposals are encouraged. Eligible applicants include any public, private, nonprofit, or for-profit organization located in or doing business in Saint Paul. Neighborhood STAR is funded by Saint Paul's half-cent sales tax.

**Cultural STAR** - The Cultural STAR Program provides grants and loans to Saint Paul cultural projects and organizations. Most projects are located in the [Saint Paul Cultural District](#) (bordered by I-94 to the north, the Lafayette Bridge to the east, the Mississippi River to the south, and Chestnut Road to the west). Cultural STAR grows Saint Paul's economy by strengthening the arts and cultural sector and supporting downtown as a vital cultural center. The Cultural STAR Program is funded by Saint Paul's half-cent sales tax.

The four major goals of the Cultural STAR Program are:

- Build and diversify audiences
- Promote a broad range of cultural offerings
- Produce a long-term impact
- Leverage additional financial support

The City also supports other regional economic development initiatives which are coordinated with the Consolidated Plan. Greater MSP is a regional economic development effort that brings the regional planning focus on development. This effort takes as given that economic development in the region supports all the communities in the region. Thrive MSP is a vision for the Twin Cities region that includes strategies for creating regional economic competitiveness and promoting equity, which align with the City's priorities.

## **Discussion**

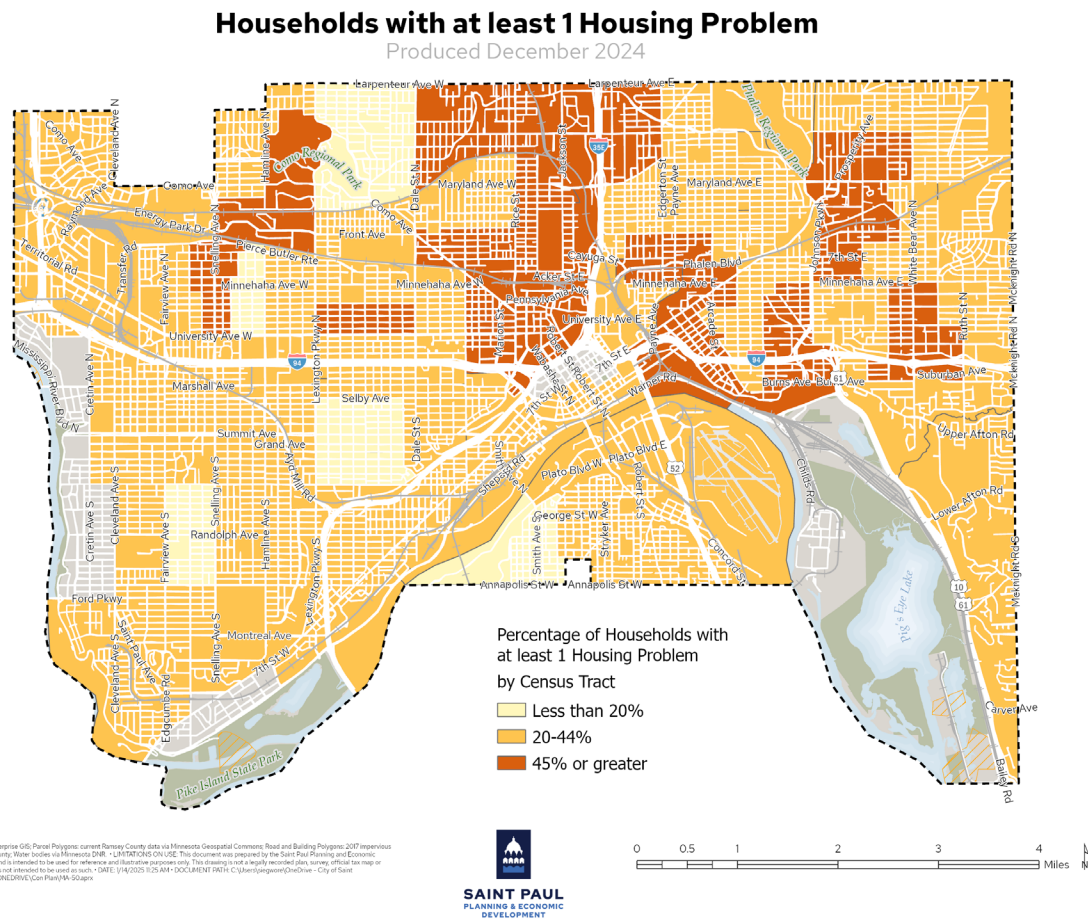
The City and its subgrantees have used CDBG funding to assist about 35 businesses over the last five years, and it is anticipated that we will continue to fund economic development activities over the next five years. Projects are carried out by series of subrecipients and the City's Planning and Economic Development department to provide small businesses funding for façade improvements, rehabilitation, and code correction. The activities help to retain and attract businesses to the city and create jobs for city residents. The businesses that are assisted with CDBG funding must either have a low/moderate income service area or create jobs for low/moderate income persons. CDBG dollars under the Public Service spending category are also invested in the City's youth workforce development internship program. The City also invests local dollars in commercial real estate development and business loans to support job creation and tax base growth and places a strong priority on investing City contracting dollars in doing business with certified Disadvantaged Business Enterprises. The State of Minnesota also provides loans and grants to support job growth.

# MA-50 Needs and Market Analysis Discussion

## Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

2017-2021 CHAS data includes location of households experiencing one or more housing problems (lacks kitchen or plumbing, more than one person per room, or cost burden greater than 30%). Shown in Map MA-50-1 below, there are areas in Saint Paul where concentrations of households with housing problems exist. These are census tracts where 45% or more households experience at least one housing problem, which are primarily located in the central northern part of the city, which includes along the northern segment of Interstate 35E (I-35E) in the North End and Payne-Phalen neighborhoods, portions of neighborhoods close to downtown including Dayton’s Bluff, Frogtown, and Summit-University neighborhoods, and pockets of Greater East Side, Battle Creek/Highwood Hills, Como Park, and Hamline-Midway near Snelling Avenue. Many of these parts of the city contain some of oldest housing stock and most affordable rents.

**Map MA-50-1: Households with at least 1 Housing Problem**



**Are there any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated? (include a definition of "concentration")**

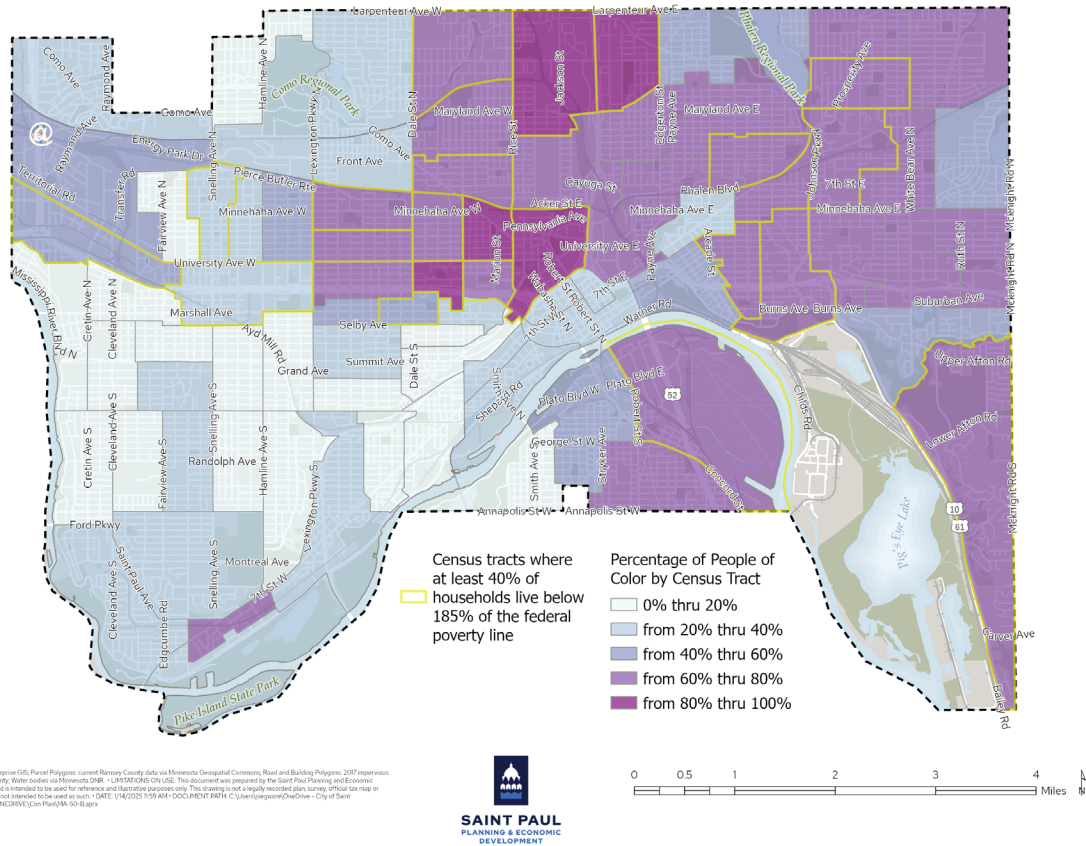
Shown in Map MA-50-2 below, there are areas in Saint Paul where concentrations of minorities and low-income households are located. These concentrations are in the central part of the city just outside of downtown, including the neighborhoods of Dayton's Bluff, West Side, Frogtown, and Summit-University, along the northern segment of I-35E in the North End and Payne-Phalen neighborhoods, the east side neighborhoods, along I-94 and Highway 10.

This map is informed by 2023 ACS 5-year data and indicates census tracts where at least 40% of the population has incomes below 185% of the federal poverty threshold and where at least 60% of the population is people of color. These areas also have the highest percentages by census tract of carless households, cost-burdened households, and population without a college degree, and track patterns of historic redlining and housing discrimination. Recent immigrants from countries from around the world over the last decade has followed this historic residential pattern for people of color and has contributed to the concentration of racial and ethnic communities. Furthermore, the lack of availability of lower cost housing in higher-income parts of the city has also contributed to the concentration.

**Map MA-50-2: Racial and Ethnic Minorities and Low-Income Census Tracts**

**Racial and Ethnic Minorities and Low-Income Census Tracts**

Developed in January 2025



DMA CREDITS: St. Paul Enterprise GIS, Parcel Polygons current Ramsey County data via Minnesota Geospatial Commons, Road and Building Polygons, 2017 reversion surface (dataset: Ramsey County, Older) codes via Minnesota DNR - LUMINAIRGIS ON USE. This document was prepared by the Saint Paul Planning and Economic Development Department and is intended to be used for reference and illustrative purposes only. This drawing is not a legally recorded plan, survey, official tax map or engineering schematic and is not intended to be used as such. DATE: 1/14/2025 1:59 AM - DOCUMENT PATH: C:\Users\jgreenwood\OneDrive - City of Saint Paul\Documents\GIS\PRO GREDRAW\CityPlan\MA-50-04.aprx

**What are the characteristics of the market in these areas/neighborhoods?**

In general, these areas are locations where the most affordable housing options are available. Rents and home values are lower than other areas in the city. These are also areas of older homes that often suffer from deferred maintenance, absentee owners, and areas of disinvestment. Several of these areas are currently experiencing reinvestment, particularly in the areas adjacent to the Green Line, Allianz Field at University and Snelling, Metropolitan State University, and revitalizing commercial corridors, which are described in more detail below.

**Are there any community assets in these areas/neighborhoods?**

These areas benefit from a variety of investments in public transportation, housing, and other development. A major community asset for the neighborhoods along University Avenue is the Green

Line, Saint Paul's first light rail line that connects downtown Saint Paul to downtown Minneapolis, and the development that has occurred along the corridor as a result. United Village, guided by the Snelling Midway Redevelopment Site Master Plan, is also a community asset with Allianz Field, the Minnesota United FC Major League Soccer Stadium, inclusive playground, 'The Calling' sculpture, and planned future development at University Avenue and Snelling Avenue. Additional community assets in these areas include the Rice Street commercial corridor and the Trout Brook Nature Sanctuary for the North End neighborhood, Phalen Creek, Lake Phalen, Phalen Village, and the Payne Avenue corridor for the Payne-Phalen and Greater East Side neighborhoods, Swede Hollow Park, the Bruce Vento Nature Sanctuary, and East 7<sup>th</sup> Street corridor for the Dayton's Bluff neighborhood, White Bear Avenue corridor for the Greater East Side neighborhood, and Battle Creek Regional Park and Sun Ray Shopping Center for the Battle Creek/Highwood Hills neighborhood.

### **Are there other strategic opportunities in any of these areas?**

Many of these areas are designated as Opportunity Zones by the City of Saint Paul Department of Planning and Economic Development. Through the Tax Cuts and Jobs Act of 2017, Congress incentivized investment in lower-income areas through the Opportunity Zones program. The program provides tax relief for investors who re-invest their unrealized capital gains into specific low-income communities. By providing tax breaks to investors, the program attracts investment dollars into low-income communities. The City works in partnership with Opportunity Funds, developers, investors, and the community to leverage capital gains equity and other investments in projects that meet City and community values.

Like the Cultural Destination Areas, Opportunity Zones are full of community assets that present strategic opportunities for redevelopment. In the St. Anthony Park Neighborhood, the Creative Enterprise Zone is an emerging mixed-use neighborhood with creative and industrial uses and the Frogtown and Summit-University neighborhood includes the Green Line East Focus Area that is poised for growth and investment to reflect the diverse culture of the area's residents. The North End neighborhood includes the North End Nexus Focus Area, an area that provides opportunities for coordinated redevelopment with Roseville and Maplewood in the area surrounding the intersection of Rice Street and Larpenteur Avenue and redevelopment of vacant or underutilized industrial sites. The Rice-Larpenteur Vision Plan provides a strategy to manage future growth of the area surrounding that intersection. The Dayton's Bluff and Greater East Side neighborhoods includes the Phalen Corridor Focus Area, which has seen significant revitalization, while presenting additional opportunities for redevelopment, especially at the East 7th and Arcade business district. The Gold Line East Opportunity Zone in the heart of the city's East Side and is planned for denser development in tandem with the Gold Line Bus Rapid Transit (BRT) line connecting Saint Paul and the eastern suburbs along I-94. The West Side neighborhood contains City Center and Riverfront Focus Area, which includes the West Side Flats area adjacent to the Mississippi River and home to the city's riverfront esplanade. The West Side Flats Master Plan and Development Guidelines set a framework for reinvestment in the West Side neighborhood that includes sites for new housing and job opportunities.

In addition, leveraging planned and future transit improvements within these neighborhoods to help spark reinvestment and provide connection to residents and jobs is a key strategic opportunity. Many transit investments are planned outside of the associated neighborhoods around the Green Line. Slated to open in 2025, the Gold Line BRT has stations in the Dayton's Bluff and Battle Creek/Highwood Hills neighborhoods and is expected to help drive transformations in the land use and market conditions nearby. The Purple Line BRT is a proposed transit line between downtown Saint Paul and Maplewood, with stations locations in the Payne-Phalen neighborhood and near Dayton's Bluff and being evaluated in the Greater East Side neighborhood.

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

### **Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

According to the State of Minnesota Office of Broadband Development, broadband refers to Internet connections that can transfer data and information (like web pages) at high speeds. Broadband service is delivered through the fiber and coaxial networks of cable providers; DSL service over the telephone network; optical fiber to the home or business; mobile and fixed wireless systems; and satellite connections. Broadband plays a vital role in connecting people to employment, health care, education, and the global economy.

According to State of Minnesota Office of Broadband Development 2019 data, 99.98% of Ramsey County households have broadband availability or access to at least 100Mbps download/20Mbps upload speeds. Statewide, this percentage is 88.03%. The Office of Broadband Development also provides data on underserved broadband service areas (defined as having wireline broadband of at least 25Mbps download and 3Mbps upload but less than 100Mbps download and 20Mbps upload) and unserved broadband service areas which is defined as having broadband service of at least 25Mbps download and 3Mbps upload and via a wired connection. As shown in Map MA-60-1, there are few areas in Saint Paul that are unserved and underserved in terms of wired access to broadband. While some of these areas lie within areas in which 50% of households have incomes below 60% of the Area Median Gross Income (AMGI) or census tracts that have a poverty rate of 25% or more, most are not developable residential land apart from the Highland Bridge development site, which is currently being developed as a mixed-use community.

While Saint Paul is well connected regarding access to wired connectivity infrastructure, other barriers exist, including the cost of internet service and devices and digital literacy. Many Saint Paul households are unable to afford the cost of internet service as well as the devices, including a modem and computer, tablet, or smart phone required to access the service. In addition, many households lack digital literacy about how to connect to broadband and use a computer and/or the importance of broadband in staying connecting to family and friends, employment, health care, education, and the global economy.

There are organizations that are working towards reducing barriers to broadband connectivity by providing low-cost internet and computers to low-income households. PCs for People is a non-profit organization with a mission to offer affordable technology to provide a bridge across the digital divide that offers employment and educational opportunities to low-income individuals and non-profits. PCs for People offers low-cost computers and nationwide high-speed LTE internet service for households

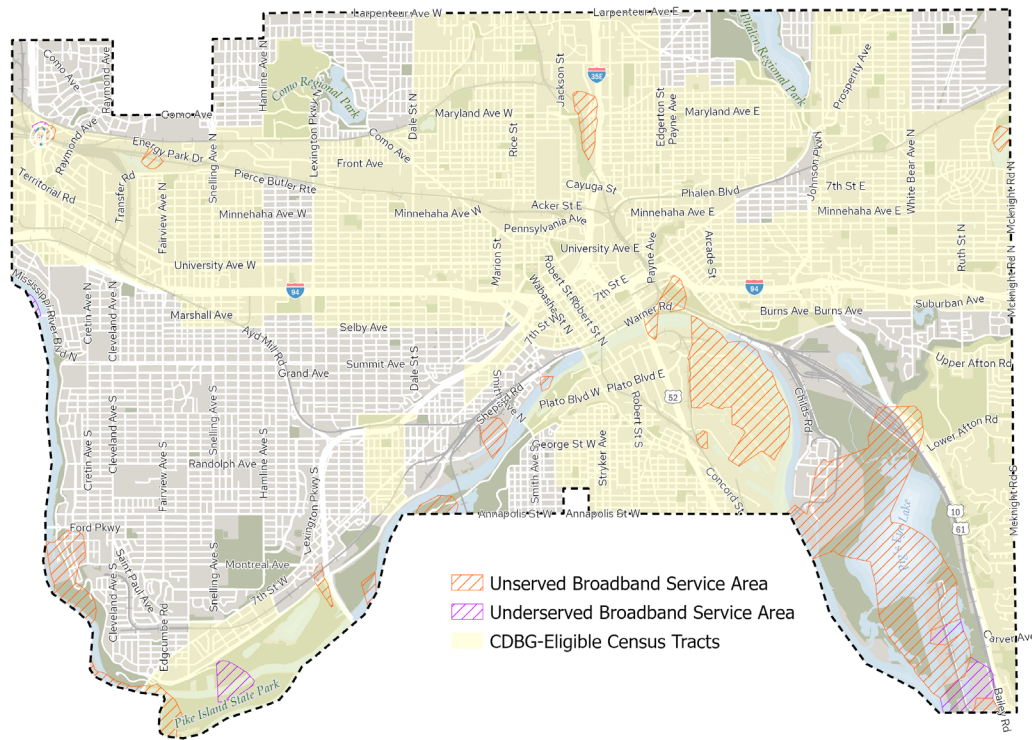
under 200% of the federal poverty level, 60% of area median income, or enrolled in an income-based government assistance program. Comcast’s Internet Essentials Program offers low-cost computers and affordable home internet to households that are eligible for public assistance programs such as the National School Lunch Program, Housing Assistance, Medicaid, SNAP, SSI, and others, and they recently lowered those eligibility requirements to reach a greater number of people. Saint Paul Public Libraries and other community organizations offer computer classes and technology help, as well as a mobile internet bus that can visit residents in needed areas of the city.

In addition, Saint Paul Public Libraries provide free wireless internet access and public internet computers that do not require a library card to use at all Library locations, as well as trained staff to provide computer assistance and classes. Saint Paul residents can also check out a wireless internet hotspot for free, high-speed Internet service.

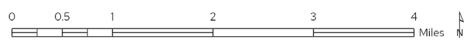
**Map MA-60-1: Unserved and Underserved Broadband Service Area**

### Unserved and Underserved Broadband Areas

Developed in January 2025



DATA CREDITS: St. Paul Enterprise GIS Parcel Polygons current Ramsey County data via Minnesota Geospatial Commons, Road and Building Polygons 2017 Impervious Surface dataset, Ramsey County, Water Bodies via Minnesota DNR - LAKES AND RIVERS. This document was prepared by the Saint Paul Planning and Economic Development Department and is intended to be used for reference and illustrative purposes only. This drawing is not a legally recorded plan, survey, official tax map or engineering schematic and is not intended to be used as such. DATE: 1/14/2025 10:22:09 AM | SOURCE: ENR | PATH: C:\Users\jgordon\OneDrive - City of Saint Paul\Documents\GIS PROJ ONE DRIVE\Cen Plan\MA-60 Broadband.aprx



**Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

According to the Office of Broadband Development, there are eight broadband providers in Saint Paul that provide at least 100Mbps download/20Mbps upload speeds. There are a variety of providers that offer fiber, fixed wireless, cable, and DSL. The largest providers for the city are Comcast Xfinity and CenturyLink. Increased competition can lead to lower service costs for customers.

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

The City of Saint Paul has been experiencing climate change for many years and increased natural hazard risks as a result. Building on decades of Saint Paul's framework for community resilience, the City developed a Climate Action & Resilience Draft Plan (CARP), which focuses on achieving carbon neutrality in city operations by 2030, and citywide by 2050 with a suite of targets and actions to decrease emissions across every sector in the city. It also identifies ways to cultivate long-term resilience, enhance the natural infrastructure of the city, and promotes a vision for Saint Paul's future with diminished threats of climate change.

The CARP references a report from the Interagency Climate Adaptation Team prepared by the Minnesota Pollution Control Agency, which identifies warmer summers and winters and more frequent and intense weather events as the hallmarks of climate change in Saint Paul, which can impact health, livability, landscape, and the environment. The report states that the frequency and severity of extreme cold conditions are declining rapidly, adding that the heaviest snowstorms have also become larger even as winter has warmed. Heavy downpours in Minnesota are now twice as frequent as they were a hundred years ago, and scientists expect events like these to become an increasingly common part of our daily lives.

In April of 2016, Saint Paul-Ramsey County Public Health developed a climate change vulnerability assessment, which identified populations and geographic areas that may be particularly vulnerable to climate hazards. As documented in the CARP, the climate hazards likely to impact Saint Paul are:

**Extreme Heat Events:** Heatwaves are expected to become more common by the middle of the 21st century. Extreme heat will be exacerbated in urban areas where impervious pavement and limited vegetation result in the urban heat island effect.

**Poor Air Quality:** Air pollutants, such as ozone, particulate matter, and allergens pose acute and chronic respiratory and cardiovascular threats. Rising temperatures and changes in precipitation patterns may lead to increased air pollution. Increased frequency of wildfires in the western United States and Canada have also impacted local air quality.

**Changes in Precipitation:** Increased precipitation has already been observed in Minnesota and is likely to increase into the future. This increase occurs in all seasons, but spring and summer are becoming wetter at a faster rate than fall and winter. Changes in precipitation patterns will likely lead to more river and flash flooding.

**Ecological Changes:** Vector-borne disease transmission is expected to increase due to changes in the distributions of ticks, mosquitoes, and other insect vectors because of warming temperatures and

changing precipitation patterns. Diseases include West Nile Virus, Lyme disease, and human anaplasmosis. The urban forest is directly impacted by invasive species like Emerald Ash Borer, that can lead to changes in the canopy and reduce the benefits that a healthy forest provides.

In 2019, the City updated the All-Hazard Mitigation Plan which addresses how to mitigate against hazards such as dam/levee/floodwall failure, damaging winds/thunderstorms, drought, extremely heat/cold, flood, human infectious disease, landslide/slope failure, severe winters storm, tornado, urban fire/wildfire. Hazard mitigation planning ultimately helps to protect Saint Paul residents. By working with city, county, state, and federal departments and agencies, we can identify vulnerabilities and develop strategies to reduce or eliminate the effects of a potential hazard.

**Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

A natural hazard due to climate change that may impact housing occupied by low- and moderate-income households is flooding. The risk of flash flooding varies across Saint Paul and is influenced by topography, watershed, and land use. Areas that are more susceptible to flash flooding tend to be low-lying with high levels of impervious surfaces, like roads and parking lots. Areas with greater biomass and vegetation coverage, as well as higher elevation, are at a relatively lower risk.

Saint Paul has a long history of flood events. Based on historical occurrences, federal disaster declarations, and analysis of impacts and consequences, flooding is one of the most frequent and costliest natural hazards impacting Saint Paul. With the availability of flood mitigation assistance in recent years, large tracts of the flood-prone riverfront have been mitigated by relocating structures from repetitively flooded areas and converting areas to permanent open space and recreational sites. Saint Paul faces risks and vulnerabilities associated these heavy precipitation events that will continue to increase in frequency and duration as the climate changes. Although Saint Paul's previous flood mitigation projects have reduced the impacts of flooding along the Mississippi River, the area's topography continues to make it prone to flooding and flash flooding during significant rain events.

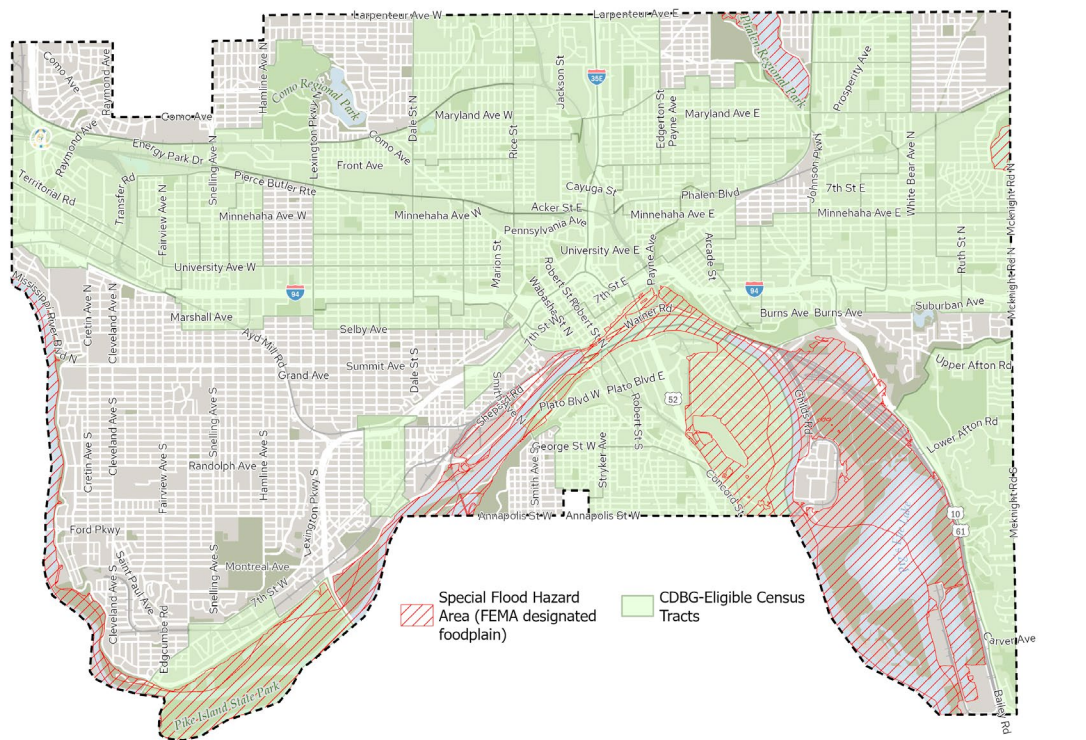
Floods often cause damage to homes and businesses if they are placed in natural flood plains of rivers. Floods can result in partial or complete loss of facilities. Most property losses occur to residential structures, which would cause an economic hardship for people who do not have flood insurance. Flooding events may also result in a temporary loss of power and/or phone service lasting from a few hours to several days. Results of these impacts often complicate communications with responders, which could affect availability of personnel and the ability to continue operations at acceptable levels.

People and buildings located in or near a floodplain are at the greatest risk, and although there is still a risk, people and businesses located outside of a floodplain are at a lower risk. The density of downtown is a vulnerable aspect in the event of a major flooding event for both residents, visitors, and responders

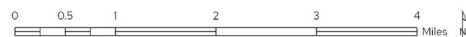
as flooding is dangerous to navigate in and around. Vulnerable populations identified by the City include people who speak limited English, the elderly, lower socioeconomic status, disabled (physical and mental) and people who do not have access to traditional methods of communication to receive warnings (i.e., no TV, radios or internet; or are vision or hearing impaired).

The City has conducted modeling on historic flooding events and continues to monitor the risk of flooding by evaluating and understanding infrastructure. Based on this analysis, Saint Paul’s highest risk areas for flooding are those near the Mississippi River, particularly in the FEMA designated floodplain which includes areas like Lowertown, Childs Road, Barge Channel Road, and Harriet Island. The Capitol Region Watershed District additionally delineated inundation area adjacent to Trout Brook Interceptor and Como Golf Course. Outside of these areas, risk of flooding in Saint Paul is largely dependent on circumstances. As shown in Map MA-65-1 below, some of the areas of highest risk to flooding (Special Flood Hazard Areas designated by FEMA) are also areas occupied with CDBG-eligible census tracts (with at least 51% low/moderate income persons). However, most of these areas are industrial or park land, and there are very few residential properties located within the floodplain.

### Flood Hazard Areas Produced January 2025



DATA CREDITS: St. Paul Enterprise GIS; Parcel Polygons current Ramsey County data via Minnesota Geospatial Commons; Road and Building Polygons: 2017 Impervious surface dataset, Ramsey County, State; bodies via Minnesota DNR - LIMITATIONS ON USE: This document was prepared by the Saint Paul Planning and Economic Development Department and is intended to be used for reference and illustrative purposes only. The mapping is not a legally recorded plan, survey, official engineering schematic and is not intended to be used as such. DATE: 1/14/2025 1:07 AM - DOCUMENT PATH: C:\Users\jgasper\OneDrive - City of Saint Paul\Documents\GIS\PRO\GRC\DWG\CenPlan\MA-65.aprx



# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

Saint Paul is an older, fully developed city with infrastructure, housing, and commercial properties that are in constant need of repair and replacement. As described in the needs assessment, the City also has several other housing and community development needs for its residents. The process of prioritizing these improvements, addressing needs, and allocating scarce resources is a difficult task. The City utilizes plans, policies, and resident and organizational input to help make these decisions. The priorities reflect the needs of the entire City and assume that all funding sources, including HUD funding, will not change significantly over the next five years. The City will undertake a variety of strategies to address its priority needs:

- Continue to provide community services through an institutional delivery structure based on strong partnerships among public, private, and non-profit partners. The City, Ramsey County, and community service agencies work together to use community-wide gaps analysis to assess needs and provide comprehensive services to assist unhoused residents and residents with special needs.
- Address barriers to affordable housing through city policies and initiatives, including creating and preserving housing that is affordable at all income levels; addressing racial, social and economic disparities in housing; creating infrastructure needed to stabilize housing; funding an Affordable Housing Trust Fund; and funding down payment assistance for first-time homebuyers. Recent zoning changes will also allow more creative housing density on existing residential lots, like ADUs.
- Address homelessness by working with Ramsey County and the Ramsey County CoC to ensure that comprehensive homelessness prevention and rapid rehousing services can be provided to all people experiencing homelessness. The City and County work to provide funding support to emergency shelters, transitional housing services, street outreach to residents experiencing homelessness, homelessness prevention resources, and rapid re-housing programs that support the needs of residents experiencing homelessness or those at risk of becoming homeless. Saint Paul non-profit organizations and service providers maintain community outreach, drop-in centers, meals, and other direct services to reach out to residents experiencing homelessness and those at-risk of becoming homeless. In addition, Ramsey County provides programs and counseling to previously institutionalized or homeless residents through partnerships with non-profit service providers to aid in the transition to permanent housing, and the City has provided financing for supportive housing facilities citywide.
- Address lead-based paint hazards by complying with HUD regulations concerning lead-based paint (LBP), including notifying applicants of the lead requirements, performing lead screening,

requiring abatement by certified workers, and completing clearance testing on HUD-funded housing projects.

- Work towards reducing poverty by implementing programs and policies with a goal of reducing the number of families living in poverty, funding youth workforce activities and public services, and working with partners such as Ramsey County and community organizations to carry out programs that aid businesses and create jobs for low/moderate income persons.

## SP-10 Geographic Priorities – 91.215 (a)(1)

### Geographic Area

Table 47 - Geographic Priority Areas

Area Name:	Citywide
Area Type:	Other
Other Target Area Description:	Other
HUD Approval Date:	
% of Low/ Mod:	
Revital Type:	
Other Revital Description:	
Identify the neighborhood boundaries for this target area.	
Include specific housing and commercial characteristics of this target area.	
How did your consultation and citizen participation process help you to identify this neighborhood as a target area?	
Identify the needs in this target area.	
What are the opportunities for improvement in this target area?	
Are there barriers to improvement in this target area?	

### General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Investments are allocated city-wide based on needs. The highest-need areas are identified on the attached map image that shows the CDBG-qualified areas, where at least 51% of persons are low/moderate income persons. The City has a strong focus on racial and social equity and reducing disparities. The City’s Comprehensive plan prioritizes a wide distribution of opportunities in education, employment, housing, health and safety, and creating opportunities for all residents to achieve their highest potential. The Comprehensive Plan also includes policies about public investments:

- Policy H-56. Improve the stability and health of communities of concentrated disadvantage by implementing placed-based investments, such as public infrastructure, improvements and maintenance.

- Policy LU-3. Prioritize public investments in areas of concentrated poverty as defined by the Metropolitan Council.

## SP-25 Priority Needs - 91.215(a)(2)

### Priority Needs

1	<b>Priority Need Name</b>	Preservation of existing affordable housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Rental Housing Rehabilitation
	<b>Description</b>	Working with public- and private-sector affordable housing providers to preserve existing, contractually obligated, affordable housing that is set to expire between 2025 and 2030; providing housing rehabilitation assistance for existing affordable housing units.
	<b>Basis for Relative Priority</b>	It is one of the City's top housing priorities to preserve affordability in existing units. About 88% of the residential units in Saint Paul were built before 1980. The age of existing housing suggests that rehabilitation is needed to provide decent, affordable housing into the future. This was corroborated through the citizen participation process and agency consultation.
2	<b>Priority Need Name</b>	Development of new affordable housing
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Public Housing Residents
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Development of New Housing
	<b>Description</b>	Supporting the development of new affordable housing for low/moderate income households.

	<b>Basis for Relative Priority</b>	The housing market analysis demonstrates that there is not sufficient affordable housing for households at all income levels in Saint Paul. For households earning 0-30% AMI, there are only 7,265 rental units and more than three times as many households in need of that housing. The need for affordable housing development was corroborated through the citizen participation process and agency consultation.
<b>3</b>	<b>Priority Need Name</b>	<b>Support stable, affordable, and well-maintained homeownership;</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Low Moderate Large Families Families with Children Elderly
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Homeowner Housing Rehabilitation
	<b>Description</b>	Providing access to low-interest loans and down-payment assistance for new/prospective homeowners and housing rehabilitation assistance for homeownership units.
	<b>Basis for Relative Priority</b>	The housing market analysis demonstrates that 87% of owner-occupied units (primarily single-family homes) were built before 1980 with 64% being built before 1950. The age of the single-family housing stock coupled with the level of cost burden experienced by low-to-moderate income owners makes home maintenance issues critically important in Saint Paul. In addition, it was evident through the citizen participation process and agency consultation that many Saint Paul residents would like to be able to age in place, making ongoing maintenance a priority for many homeowners.
<b>4</b>	<b>Priority Need Name</b>	<b>Emergency shelters, unsheltered prevention and support services;</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Chronic Homelessness Individuals Mentally Ill Chronic Substance Abuse Veterans Victims of Domestic Violence Unaccompanied Youth

	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Homeless Prevention
	<b>Description</b>	Supporting the development and operation of emergency shelters, increased shelter beds, and transitional housing opportunities; providing services such as low- and no-interest rehabilitation loans, credit counseling, emergency rental assistance, mortgage foreclosure prevention, and other short-term emergency financial assistance to keep families in their current housing or prevent them from becoming unhoused; providing rapid re-housing services for those currently experiencing homelessness to help obtain housing quickly and to stay housed; and connection to supportive services for mental health, substance use treatment, and employment resources.
	<b>Basis for Relative Priority</b>	Ramsey County CoC cites homeless prevention and rapid re-housing as priorities for ESG funds. The Homeless Needs Assessment section demonstrates that there is a need for more supportive services for chronically homeless individuals, more rapid re-housing for those who are recently homeless, and more resources for homeless prevention for those at risk of becoming homeless. The homeless needs assessment also demonstrates a need for more shelter beds and warming spaces, especially for families. Ramsey County CoC cites shelter capacities, and assessors and navigators for the Coordinated Entry System, as priorities. Families with dependent children experiencing homelessness is also cited as the priority group. This was corroborated through the agency consultation process and the citizen participation process.
5	<b>Priority Need Name</b>	<b>Public services, including tenant and landlord education;</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development Extremely Low Low Moderate Large Families Families with Children
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Public Services
	<b>Description</b>	Providing additional public services that supplement existing services, including health services, senior services, crime prevention, community organizing, youth employment training, other youth services, and landlord and tenant education on issues related to maintenance of rental housing units and tenant and landlord responsibilities.

6	<b>Basis for Relative Priority</b>	Through the non-homeless special needs assessment and non-housing community development asset analysis, it was evident that there is an increasing need for public services for Saint Paul residents. Services related to health, youth, education, and workforce skills are needed. Tenants and landlords who can access education on requirements for tenants' rights and housing maintenance can improve housing outcomes across the city. The City's Department of Safety and Inspections holds monthly workshops for landlords on property maintenance, safety standards, and city permit requirements. This was corroborated through the citizen participation and agency consultation process.
	<b>Priority Need Name</b>	Fair Housing and anti-discrimination efforts
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Mentally Ill Chronic Substance Abuse Veterans Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Victims of Domestic Violence
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	
	<b>Description</b>	Supporting activities that Affirmatively Further Fair Housing and provide legal assistance to residents who have housing discrimination claims and/or are at risk of losing their housing.

	<b>Basis for Relative Priority</b>	Housing discrimination can be a significant barrier for individuals and families seeking affordable housing. While discrimination is often difficult to detect, discrimination against persons based on race/ethnicity, familial status, language, gender, age, disability, and receipt of public assistance can prevent access to safe and decent housing. In 2019, the City formed a new Office of Financial Empowerment (OFE), including a full-time Fair Housing Coordinator who works with several City departments and residents as well as with the regional Fair Housing Implementation Committee to establish policies, regulations, and programs to proactively ensure that Saint Paul residents do not experience housing discrimination and to affirmatively further fair housing. The OFE developed a Fair Housing strategy framework with overarching goals of decreasing housing displacement, increasing housing access, and focusing on Affirmatively Furthering Fair Housing. Work in four core areas will help achieve these goals: Preservation and Production, Education and Engagement, Enforcement and Compliance, and Tenant Protections. When housing discrimination occurs, the City’s Human Rights and Equal Economic Opportunity (HREEO) Department investigates complaints. The City also supports Southern Minnesota Regional Legal Services (SMRLS), which provides legal assistance to tenants at-risk of losing their housing, and the City has signed on to a national effort to increase equity in housing, hiring, and other avenues. The importance of supporting Fair Housing and anti-discrimination efforts was corroborated during the citizen participation process and agency consultation.
13	<b>Priority Need Name</b>	<b>Pre-development support, including lead-based paint abatement, acquisition, demolition, and clearance of property;</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Families with Children
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Remediation of Substandard Properties
	<b>Description</b>	Identify properties for development or rehabilitation; Purchase and/or demolish and/or dispose of and/or clear vacant, underutilized, and/or hazardous properties. Address the HUD regulations on lead-based paint hazards in federally owned housing and housing receiving federal assistance.
	<b>Basis for Relative Priority</b>	The lead-based paint found in many homes and buildings built before 1978 are a health risk, especially for young children. Addressing lead-based paint hazards and increasing access to housing without these hazards is important for the long-term health of city residents. Vacant buildings and nuisance properties can pose a threat to the public health and safety of City residents. Since Saint Paul is fully developed with limited land available, rehabilitation or removal of these properties can be important for neighborhood redevelopment and revitalization.
10	<b>Priority Need Name</b>	<b>Improve public infrastructure, city facilities, and community spaces;</b>
	<b>Priority Level</b>	high

	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Public Improvements
	<b>Description</b>	Renovation of existing public facilities in need of improvement; repair and replacement of infrastructure in the public realm such as sidewalks, streets, and sewer improvements. Pedestrian and bicycle infrastructure improvements. Library and community gathering space improvements, events, and programming for young people and elderly residents, and all ages in between.
	<b>Basis for Relative Priority</b>	Although public infrastructure and facilities were highly rated by survey respondents and community input, the City of Saint Paul has a variety of other funding sources that are used for infrastructure and facility projects. However, events and programming for all ages, community gathering spaces, and improved bicycle and pedestrian infrastructure, were rated as highly needed throughout the citizen participation process.
<b>11</b>	<b>Priority Need Name</b>	<b>Economic development and job growth</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Economic Development
	<b>Description</b>	Economic development activities including job creation; small business education and façade improvements; energy conservation improvements; leasehold improvements; and increased commercial and industrial development citywide.
	<b>Basis for Relative Priority</b>	The Saint Paul Comprehensive Economic Development Strategy include expanding business attraction, retention, and expansion activities; support innovative entrepreneurship and small business development; build and market the Saint Paul brand; direct new development to high-priority geographies and sites in the City; invest in Downtown; and align resources around spotlight neighborhoods. The City’s anti-poverty strategy and economic development initiatives include supporting businesses and building an environment where more innovative businesses can locate, start up, and continue to grow. The importance of economic development efforts and business support was corroborated through the agency consultation process and citizen participation.
<b>15</b>	<b>Priority Need Name</b>	<b>Community outreach and engagement;</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development

	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	Community Engagement
	<b>Description</b>	Outreach to underserved populations regarding community needs and available programs, services, and resources. Improved communication and engagement with communities regarding the City’s services, projects, and programs.
	<b>Basis for Relative Priority</b>	Through the citizen participation and agency consultation process, it was evident that more outreach and improved communication is needed, especially to historically underserved communities. It was learned that many residents and businesses do not know about the programs and services available to them, and lack the ability to share their needs efficiently with the City.
12	<b>Priority Need Name</b>	<b>Community planning needs</b>
	<b>Priority Level</b>	High
	<b>Population</b>	Non-housing Community Development
	<b>Geographic Areas Affected</b>	Other
	<b>Associated Goals</b>	
	<b>Description</b>	Promoting the social, physical, and economic wellbeing of residents, property owners, and business owners through implementation of the Comprehensive Plan and neighborhood plans, administering zoning and land use regulations, completing HUD-required environmental reviews for property investments, and providing local data and mapping resources.
	<b>Basis for Relative Priority</b>	Planning efforts support the goals of the Consolidated Plan and its implementation priorities, strategies, and programming.

Table 48 – Priority Needs Summary

**Narrative (Optional)**

## SP-30 Influence of Market Conditions – 91.215 (b)

### Influence of Market Conditions

<b>Affordable Housing Type</b>	<b>Market Characteristics that will influence the use of funds available for housing type</b>
Tenant Based Rental Assistance (TBRA)	The City of Saint Paul does not participate in this program. The Saint Paul Public Housing Agency undertakes this type of activity.
TBRA for Non-Homeless Special Needs	The City of Saint Paul does not participate in this program. The Saint Paul Public Housing Agency undertakes this type of activity.
New Unit Production	Through analysis completed in both the Housing Needs Assessment and Market Assessment portion of this Consolidated Plan, the City has a substantial need for housing affordable to low-income households. The 2016-2020 CHAS data shows that there are only 7,265 rental housing units affordable to households earning 0-30% of AMI with 24,170 households at this income level. For owner-occupied housing, there is a lack of housing that is affordable to households earning 50% of AMI—approximately 6,100 ownership units are affordable to 17,855 households at 30-50% of AMI.
Rehabilitation	87% of owner-occupied units (primarily single-family homes) were built before 1980 with the majority (63%) being built before 1950. The age of the single-family housing stock coupled with the level of cost burden experienced by low-to-moderate income owners makes home maintenance issues critically important in the city. 73% of rental units were built before 1980 with 34% built before 1950. Property maintenance and rehabilitation of is critical to ensure the ongoing stability and revitalization of the City's neighborhoods.
Acquisition, including preservation	In areas where reinvestment is needed, the use of strategic property acquisition and either demolition or rehabilitation is critical to facilitate community revitalization efforts.

**Table 49 – Influence of Market Conditions**

**SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)**

**Introduction**

The City expects to receive funding allocations in 2025 similar to its 2024 allocations: \$6,765,326 in CDBG funding, \$1,534,711 in HOME funding, and \$591,281 in ESG funding. In addition, the City estimates using about \$800,000 in CDBG program income and approximately \$500,000 in HOME program income. Program income is directly generated from a CDBG or HOME program funded activity, such as loan repayments. Because the federal budget allocations for 2025 are not yet passed upon drafting this Plan, the City has a contingency plan for different funding amounts. Should the City receive an amount higher or lower than the estimates from last program year, all activities will be adjusted in direct proportion to the difference in actual allocations.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Admin and Planning</li> <li>• Economic Development</li> <li>• Housing</li> <li>• Public Improvements</li> <li>• Public Services</li> </ul>	6,765,326	234,674	0	7,000,000	35,000,000	Assumes steady funding.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Homebuyer assistance</li> <li>• Homeowner rehab</li> <li>• Multifamily rental new construction</li> <li>• Multifamily rental rehab</li> <li>• New construction for ownership</li> <li>• TBRA</li> </ul>	1,534,711	206,225	0	1,740,936	8,704,682	Assumes steady funding.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	<ul style="list-style-type: none"> <li>• Conversion and rehab for transitional housing</li> <li>• Financial Assistance</li> <li>• Overnight shelter</li> <li>• Rapid re-housing (rental assistance)</li> <li>• Rental Assistance Services</li> <li>• Transitional housing</li> </ul>	591,281	0	0	591,281	2,956,405	Assumes steady funding.

Table 50 - Anticipated Resources

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

HUD requires that all participating jurisdictions (PJ) match, with non-federal funds, no less than 25 cents for each dollar of HOME funds spent on affordable housing. The City will continue to leverage private and public funds for HOME-funded affordable housing and accumulate additional match.

ESG grant regulations require that grant funds be matched 100 percent or dollar for dollar. If any match is federal, the laws governing a

particular source of federal funds must not prohibit these funds from being used as match to ESG. Additionally, if the ESG funds are used to satisfy match requirements of another federal program, then funding from that program may not be used as match for ESG.

Match requirements will be satisfied, as follows, when paid with non-ESG funds:

- In-kind donations
- Private donations
- Private foundation grants/funds
- Unrestricted federal, state, and local funds

The City actively pursues and/or requires developers to apply for State funding programs to include Minnesota Housing Finance Agency, Minnesota State General Obligation (GO) Bonds, the Minnesota Department of Employment and Economic Development (DEED), Metropolitan Council, and the Federal Home Loan Bank's Affordable Housing program. Private funding comes from foundations, fund raising, conventional loans, and developer cash and equity. City funding may include the local Housing Trust Fund, Housing and Redevelopment Authority (HRA) funds, LIHTC, TIF, Conduit Revenue Bonds, local sales tax dollars (STAR program), and discounted City/HRA owned land.

**If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The City owns property which may be suitable for development and offers these properties for sale for redevelopment through request for proposal process or other mechanisms to solicit competitive offers.

**Discussion**

Saint Paul strategically leverages financing tools including TIF, housing revenue bonds, LIHTCs, Federal and State Historic Tax Credits, Housing and Redevelopment Authority (HRA) tax levy dollars, HRA earned income and private development dollars, with the State and regional funding programs listed above, to maximize the investment impact. The City's work in housing affordability and stability is specifically oriented to deepening and widening the positive impact for the most disadvantaged residents. The City's business and job growth investments are targeted toward jobs that combine low barriers to entry with a living wage and clear career ladder opportunities.

In addition to Federal, State and local affordable housing investment vehicles noted above, Saint Paul has several programs directed toward holistic community development including job growth. These include:

The Neighborhood STAR Program provides grants for physical (capital) improvement projects in Saint Paul neighborhoods. Projects must be neighborhood-based, designed in partnership with community stakeholders, and clearly address problems, needs and opportunities in Saint Paul. Eligible applicants include any public, private, nonprofit, or for-profit organization located in or doing business in Saint Paul.

The Cultural STAR Program provides grants and loans to Saint Paul cultural projects and organizations. Most projects are in the Saint Paul Cultural District (bordered by I-94 to the north, the Lafayette Bridge to the east, the Mississippi River to the south, and Chestnut Road to the west). Cultural STAR grows Saint Paul's economy by strengthening the arts and cultural sector and supporting downtown as a vital cultural center. Cultural STAR and Neighborhood STAR is funded by Saint Paul's half-cent sales tax.

Saint Paul has a growth strategy focused on transit. Policy LU-1 of the 2040 Comprehensive Plan states, "Encourage transit-supportive density and direct the majority of growth to areas with the highest existing or planned transit capacity." Transit station areas are designated as Neighborhood Nodes, which are intended to be areas of higher intensity mixed-use development that support walkable access to jobs and services. There is currently one operating LRT line and one BRT line and one streetcar line and three BRT lines in the planning stages. Development, including higher density and affordable housing, is supported along these transit routes through planning, regional and state grants and city resources.

## SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
Ramsey County Social Services	Government	Homelessness, Non-homeless special needs	Jurisdiction
Saint Paul Public Housing Agency	PHA	Public Housing	Jurisdiction
City of Saint Paul Department of Planning and Economic Development	Government	Economic Development, Planning, Neighborhood improvements	Jurisdiction
Saint Paul Housing and Redevelopment Authority	Redevelopment authority	Economic Development, Ownership, Rental	Jurisdiction
Ramsey County Workforce Innovation Board	Other	Economic Development	Region
Ramsey County Continuum of Care	Continuum of care	Homelessness	Jurisdiction

**Table 51 - Institutional Delivery Structure**

### Assess of Strengths and Gaps in the Institutional Delivery System

**Availability of services targeted to homeless persons and persons with HIV and mainstream services**

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
<b>Homelessness Prevention Services</b>			
Counseling/Advocacy	X	X	X
Legal Assistance	X	X	X
Mortgage Assistance	X	X	
Rental Assistance	X	X	X
Utilities Assistance	X	X	X

Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics	X	X	
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X	X	
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS	X	X	X
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X	X	
Other			
Other			

Table 52 - Homeless Prevention Services Summary

**Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)**

The City Homeless Assistance Response Team (HART) is a service-based street outreach approach to strategically address the needs of those experiencing homelessness. In coordination with Ramsey County and service providers, HART aligns City and County resources to ensure that every individual can be connected to services. The program includes a new response strategy to receiving calls and managing encampments and increased coordination among service agencies to provide assessments, support, and resources. The City, County, and partner organizations continue to look for better ways to work collaboratively and efficiently and align strategies to comprehensively approach outreach and service gaps.

The City, in partnership with Ramsey County and partner organizations, developed the Familiar Faces pilot project. Intended to more effectively assist individuals with most frequent interaction with emergency services such as police, EMS, and fire. The Familiar Faces program integrates mental health and county case management services into the existing outreach programs. Familiar Faces offers a more efficient crisis support, shelter, and wrap-around service planning model.

The City and Ramsey County coordinate in partnership with Ramsey County Continuum of Care (CoC). The ESG program provides funding for homelessness initiatives which include homelessness prevention services, street outreach services, supportive services, shelter operations, and rapid re-housing

programs. The City will continue to partner with Ramsey County CoC Governing Committee, and Ramsey County Family Homelessness Assistance Program (FHAP) Committee to implement *Heading Home Ramsey* – a comprehensive plan to end homelessness in Ramsey County. The City and County CoC will continue to partner with the State's Veterans Homelessness Advisory Committee to develop housing initiatives for homeless veterans.

ESG-funded community agencies provide resources to homeless or at-risk of being homeless citizens. For single adults, Higher Ground Saint Paul provides emergency shelter while providing supportive services, such as mental health counseling, during the day. Catholic Charities' Family Service Center provided emergency shelter for families for up to 60 days – allowing time for families to seek more permanent housing. The City also owns St. Paul Residence, providing supportive housing for chronically inebriated residents. Transitional housing is provided through the YWCA St. Paul (housing with supportive services for single-parent families), Theresa Living Center (housing for single women and single-parent families), Lutheran Social Services (LSS) Life Haven (housing for teen parents). Ain Dah Yung provides culturally-response emergency shelter for urban American Indian young adults; Face to Face's SafeZone - day drop-in center/supportive services and RRH; and LSS's Safe House - transitional housing services.

Housing services are complemented by community-based services for residents experiencing homelessness, such as Listening House (drop-in for homeless adults) and Interfaith Action's Project Home Day Center (a day center for families experiencing homelessness). The YWCA St. Paul collaborates with Ramsey County Coordinated Entry, Public Housing Agency, Ramsey County Workforce Solutions, Saint Paul Public Schools and other partners to provide safe affordable housing; comprehensive support services; employment and educational training; and health & wellness initiatives to advance the mission of eliminating racism and empowering women. The First Lutheran Church Wellness Center (community nursing care to homeless citizens or citizens living in extreme poverty) emerged from a collaboration among First Lutheran Church, Metro State College, RADIUS Health and other East Side service providers.

For homelessness prevention, HouseCalls (a collaboration of Minnesota Community Care and St. Paul-Ramsey County Health Department) and East Side Family Center – Neighborhood House provides emergency financial assistance, including emergency utility assistance. Southern Minnesota Regional Legal Services provides legal assistance to tenants-at-risk of losing their housing.

**Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above**

The City, Ramsey County Community Services, Ramsey County CoC, Saint Paul PHA, and community service providers provide support services responsive to the needs of special populations, persons experiencing homelessness (individuals, families, youth, and underserved populations), and veterans.

The City/County allocate federal and state funds to provide street outreach, homelessness prevention, and rapid re-housing services to adults, families, youth, and underserved populations facing homelessness. The County provides services for elderly, frail elderly, developmentally challenged, physically challenged, mental health challenged, persons with HIV, and persons with chemical dependency. Saint Paul PHA provides support services for elderly, frail elderly, persons with a brain injury, and persons with physical challenges.

As the major social service provider, Ramsey County allocates federal and state funds to community agencies that serve residents experiencing homelessness and residents with special needs. On the other hand, Saint Paul and the State of Minnesota finance the preservation or new construction of affordable housing and supportive housing in Saint Paul. Together, the County (provider of social services) and the City (builder of affordable housing) can respond to needs of residents experiencing homelessness and residents with special needs. In the past, in face of overwhelming need of shelters, organizations have worked together to take action. The City, Ramsey County, Model Cities, Catholic Charities, and Saint Paul Foundation worked together to open an additional overflow emergency shelter to meet the increasing demands of single homeless adults. Catholic Charities, MHFA, the City, and private donors worked together to develop the new Dorothy Day Center, Higher Ground Saint Paul and Dorothy Day Residence, which provides shelter beds and supportive housing units.

Through collaboration with City Departments, the Office of Financial Empowerment, and additional stakeholders, the City continues to explore tenant protections to reduce evictions, ways to increase housing, and increase resident access to stable housing.

The City, Ramsey County, and community agencies work together to provide comprehensive services to assist residents experiencing homelessness and residents with special needs. Gaps in service delivery include the lack of sufficient funds to pay for the necessary services and the lack of sufficient targeted outreach to residents that may benefit from services.

### **Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs**

The City's institutional structure and service delivery system includes working with its partners to design service programs that work to address the needs of city residents. The City, in partnership with Ramsey County, the Public Housing Authority and social services agencies, collaboratively use community-wide gaps analysis to develop service protocols that are responsive to the needs of individuals, families, youth, and underserved populations such as residents with limited English proficiency and veterans. Still, gaps in the delivery of services occur including the lack of sufficient funds and sufficient targeted outreach to residents that may benefit from services.

The City will continue to grow its collaborative working partnerships to address the community's needs with limited financial resources. Saint Paul will continue to coordinate services with Ramsey County (the primary public service provider in the City), and the Saint Paul Public Housing Agency (the administrator of public housing and housing choice vouchers in Saint Paul), and community nonprofit organizations. In the past, these partnerships have also included the private sector as well as coordination with institutional private and public health care providers.

In response to the lack of sufficient outreach to residents that may benefit from services, the City restructured its street outreach program from an enforcement-based approach to a service-based approach to strategically address the needs of those experiencing homelessness in a team called the Homeless Assistance Response Team. In coordination with Ramsey County and other service providers, this approach aligns City and County resources to ensure that every individual can be connected to services. The program includes a response strategy to receiving calls and managing homeless encampments and increased coordination among service agencies to provide assessments, support, and resources. The City is also partnering with Ramsey County to launch a new program called Familiar Faces to address the complicated needs of individuals experiencing homelessness who have been caught in cycles of institutional or correctional facilities. The City, Ramsey County, and partner organizations continue to look for better ways to work collaboratively and efficiently and align their strategies to comprehensively approach outreach and service gaps.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeless Prevention	2025	2030	Homeless	Citywide	Homeless prevention	ESG: \$2,956,405	Homelessness Prevention: 15,000 Persons Assisted
2	Development of New Housing	2025	2030	Affordable Housing	Citywide	Development of new affordable housing	CDBG: \$1,100,000 HOME: \$7,834,214	Rental units constructed: 75 Household Housing Unit
3	Rental Housing Rehabilitation	2025	2030	Affordable Housing	Citywide	Preservation of existing affordable housing	CDBG: \$6,100,000	Rental units rehabilitated: 130 Household Housing Unit
4	Homeowner Housing Rehabilitation	2025	2030	Affordable Housing	Citywide	Support stable, affordable, safe homeownership	CDBG: \$10,660,000	Homeowner Housing Rehabilitated: 255 Household Housing Unit
5	Public Services	2025	2030	Non-Housing Community Development	Citywide	Public service needs	CDBG: \$415,000	Public service activities other than Low/Moderate Income Housing Benefit: 15,000 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Community Engagement	2025	2030	Non-Housing Community Development	Citywide	Community outreach to underserved populations	CDBG: \$1,725,000	Public service activities other than Low/Moderate Income Housing Benefit: 906,500 Persons Assisted
7	Youth Employment	2025	2030	Non-Housing Community Development	Citywide	Public service needs	CDBG: \$2,700,000	Public service activities other than Low/Moderate Income Housing Benefit: 1,290 Persons Assisted
8	Economic Development	2025	2030	Non-Housing Community Development	Citywide	Economic development and job growth	CDBG: \$1,825,000	Businesses assisted: 75 Businesses Assisted
9	Remediation of Substandard Properties	2025	2030	Non-Housing Community Development	Citywide	Acquisition, demolition, and clearance of property	CDBG: \$700,000	Buildings Demolished: 85 Buildings
10	Public Improvements	2025	2030	Non-Housing Community Development	Citywide	Public facilities and infrastructure	CDBG: \$2,750,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 35,625 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	NRSA - Railroad Island/Hamms	2025	2030	Affordable Housing Non-Housing Community Development	Citywide	Preservation of existing affordable housing Development of new affordable housing Support stable, affordable, safe homeownership Economic development and job growth	CDBG: \$25,000	Homeowner Housing Added: 10 Household Housing Unit

Table 53 – Goals Summary

**Goal Descriptions**

1	<b>Goal Name</b>	Homeless Prevention
	<b>Goal Description</b>	Homeless prevention, shelter operations, essential services, street outreach, rapid re-housing.

2	<b>Goal Name</b>	<b>Development of New Housing</b>
	<b>Goal Description</b>	Address the need for affordability of decent housing by supporting the development of new housing.
3	<b>Goal Name</b>	<b>Rental Housing Rehabilitation</b>
	<b>Goal Description</b>	Address the need of sustaining decent housing by providing rehabilitation assistance to rental housing occupied by low/moderate-income households.
4	<b>Goal Name</b>	<b>Homeowner Housing Rehabilitation</b>
	<b>Goal Description</b>	Address the need of sustaining decent housing by providing rehabilitation assistance to homeowner housing occupied by low/moderate-income households.
5	<b>Goal Name</b>	<b>Public Services</b>
	<b>Goal Description</b>	Improve the availability of a suitable living environment by funding public service activities.
6	<b>Goal Name</b>	<b>Community Engagement</b>
	<b>Goal Description</b>	Address the sustainability of a suitable living environment by providing funding for public information & crime prevention programs.
7	<b>Goal Name</b>	<b>Youth Employment</b>
	<b>Goal Description</b>	Address the availability of economic opportunity by providing employment opportunities and training to city youth.
8	<b>Goal Name</b>	<b>Economic Development</b>
	<b>Goal Description</b>	Address the sustainability of economic opportunity by assisting businesses with rehabilitation or economic development activities.

9	<b>Goal Name</b>	<b>Remediation of Substandard Properties</b>
	<b>Goal Description</b>	Address the sustainability of a suitable living environment by acquiring or demolishing substandard properties.
10	<b>Goal Name</b>	<b>Public Improvements</b>
	<b>Goal Description</b>	Address the sustainability of a suitable living environment by renovating existing public facilities in need of improvements.
11	<b>Goal Name</b>	<b>NRSA - Railroad Island/Hamms</b>
	<b>Goal Description</b>	Direct targeted investments for housing and economic development to the Railroad Island/Hamms area neighborhood revitalization strategy area.

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)**

## **SP-50 Public Housing Accessibility and Involvement – 91.215(c)**

### **Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)**

It is the policy of the Saint Paul PHA to fully comply with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act and Title II of the Americans with Disabilities Act. The PHA has not been required to execute a Voluntary Compliance Agreement (VCA).

PHA also maintains 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 as well as the PHA Central Administrative Office building meets all Section 504 ADA requirements.

### **Activities to Increase Resident Involvements**

**Resident Advisory Board** - As required by the Public Housing Reform Act of 1998 (QHWRA) since 1999, the SPPHA has convened a Resident Advisory Board (RAB) annually to update an Annual Agency Plan. The RAB membership has been comprised of the following:

- All members of the Hi-Rise Presidents Council (16 Hi-Rise buildings).
- All members of the Family Residents' City-Wide Residents Council (16 members, including the 4 officers from each of the 4 family housing developments).
- Section 8/HCV representatives who volunteered for the RAB.
- Two PHA Commissioners - 1 Commissioner represents the hi-rise residents, and 1 Commissioner represents residents of the family housing developments and scattered site homes.

Each year PHA Senior Management has met with the RAB, including the Hi-Rise Presidents Council and the Family City-Wide Residents' Council, to discuss PHA policy changes, the Annual and 5-Year Agency Plan, and Capital Improvements. The PHA Resident Initiatives Department and the Resident Councils work together to form new partnerships with community service agencies for the benefit of residents.

The PHA annually updates its Agency Plan for the fiscal year; staff reviews the plan with the RAB and representatives from tenant advocacy organizations. The draft is then released for public comment and a public hearing is held in mid-November.

In Calendar Year 2020 and thereafter, only the PHA's 418 units remaining in the public housing program will be covered by the Agency Plan. The PBRA program does not have a comparable requirement.

**Section 3** – To promote economic opportunities, the PHA implements the Federal Section 3 mandate, to the greatest extent possible, by hiring qualified PHA residents and qualified Section 3 businesses.

Section 3 provides employment and other economic opportunities generated using HUD funds to be directed to low- and very low-income citizens and businesses owned by PHA residents or other low-income persons. PHA has provided job skills training and employment opportunities for residents using a HUD Resident Opportunities and Self Sufficiency (ROSS) Grant. Thanks to the ROSS Grant Coordinators' hard work, public housing residents have been able to access job skills training and attend hiring fairs at PHA community centers. PHA residents were provided Workplace Essentials training by Avivo (formerly Minnesota Resource Center). Twenty (20) PHA residents have successfully completed small business training provided by African Economic Development Solutions (AEDS). Moving forward, these graduates will have access to unlimited counseling in business development, marketing insights, general support and financial advice, leads, and Sharia banking if relevant.

**Is the public housing agency designated as troubled under 24 CFR part 902?**

No

**Plan to remove the 'troubled' designation**

**Not applicable.** In 2019, the PHA earned HUD's High Performer rating for the 29th consecutive year under HUD's Public Housing Management Assessment Program (PHMAP). SPPHA has also maintained HUD High Performer status under HUD's Section 8 Management Assessment Program (SEMAP) for 23 years.

As explained elsewhere, the PHA has a continual need for stable Federal funding to maintain its high standards. The PHA received approval from HUD to convert most its public housing properties under the RAD Program. The debt-free conversion to Project-Based Rental Assistance (PBRA) is effective January 1, 2020.

## **SP-55 Barriers to affordable housing – 91.215(h)**

### **Barriers to Affordable Housing**

Housing policy must be thought of in the context of economic development (building household income/net worth), transportation (connecting people to jobs) and land use (locating parks, jobs, education and essential services near housing). City Council passed resolution 18-1204 to create and preserve housing affordable at all income levels; address racial, social and economic disparities in housing; create infrastructure needed to stabilize housing; fund an Affordable Housing Trust Fund (HTF); and continue to fund down payment assistance for first-time homebuyers. The resolution is a public acknowledgement that housing, especially affordable housing, is a City priority.

The most significant barriers for households securing affordable housing units are insufficient income and the lack of affordable housing units. The greatest gap in affordable housing units is for household with income below 30% AMI. Not only is the supply of units few, but many of the units are occupied by households that could afford a unit at a higher rent. Barriers for developing affordable housing include high costs and lack of funding and available land in a built-up city. While some of the barriers to producing affordable housing are beyond the control of local government, local policies like regulatory codes, fees, and zoning regulations may hinder the development of or increase the cost of housing.

From a financing perspective, affordable housing development requires multiple funding sources including the City local funds, TIF LIHTC, State dollars, federal funding from HUD (CDBG, HOME), and redevelopment property acquired and assembled by public entities. To keep pace with increasing demand for affordable housing and to balance development to ensure locational choice, continued federal and state funding is needed. The lack of sufficient funding and insufficient allocation of LIHTCs has negative bearing on the City's ability to provide and invest in affordable housing. The City receives only about 36% of the CDBG funding it received in 1975. Similarly, the City receives about 75% of the HOME funding it received in 2000. The City's LIHTC allocation also continues to shrink.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

There are about 18,000 publicly assisted affordable housing units within Saint Paul; roughly 9,400 are subsidized through the PHA. The City finances preservation, rehabilitation and construction of affordable housing citywide using city-owned and discounted County-owned land and local, state, and federal funds and financing tools - LIHTCs, Federal and State Historic Preservation Tax Credits, and issuing Housing Revenue bonds.

City Council Resolution 18-1204 outlines a broad range of actions to support greater housing supply and stability, including efforts to create and preserve housing affordable at all income levels; address racial, social and economic inequalities in housing; create infrastructure to stabilize housing; fund an Affordable Housing Trust Fund; and continue to fund down payment assistance for first-time homebuyers. The Resolution also called for housing funded through the HRA to accept Section 8 vouchers; added points to the LIHTC scorecard for senior housing; and increased use of Tenant Remedies Actions.

Over the last five years, Saint Paul has amended its zoning code to support housing development and reduce barriers to affordable housing. Requiring a minimum number of off-street parking can increase the cost of development and in 2021, the City eliminated these zoning requirements. City Council passed Ordinance 23-43 which eliminated single-family-only zoning districts and updated zoning regulations to reduce barriers to allow increased housing density, diversify housing options, and incentivize providing rental units affordable at 60% of AMI, ownership units at 80% of AMI, units with three or more bedrooms, and for retaining an existing residential structure. The City will continue to remove barriers to housing development through updates to the zoning code and develop resources, including a “new development toolkit” and pre-approved to help facilitate the building process.

Saint Paul voters approved a Residential Rent Stabilization ordinance in 2021 which took effect in May 2022 and modifications in effect January 2023. The rent-control ordinance limits rent increases within a 12-month period to 3% of the existing monthly rent, with a few exceptions, including for housing that is affordable. With more than 50% of residents as renters, the purpose of the ordinance is to retain or create new affordable rental housing particularly for lower income households and those on a fixed income. This ordinance is being evaluated.

The City has established sustainable building regulations to increase the environmental and financial sustainability of development. Upfront investments in energy efficiency increases costs of new construction/major renovation but results in structures that are more sustainable and energy efficient which cost less to operate and maintain over time, which directly benefits LMI tenants.

In the past two years, CDBG funding was provided for community land trust housing to extend homeownership opportunities to lower income residents, and City and State allocated funds for deferred down-payment assistance loans designed to make homeownership possible for lower income residents by reducing private mortgage requirements. City preserves Naturally Occurring Affordable Housing through the 4(d) program which gives rental property owners an approximate annual property tax rate reduction of 80% and grant assistance for rehabilitation for units that remain affordable at 50% or 60% AMI for the next 10 years. The City also supports Naturally Occurring Affordable Housing through a Rental Rehab program.

Affordable housing is an important element of redevelopment with City investment in infrastructure. At the former Twin Cities Ford assembly plant, the Highland Bridge redevelopment is required to include 760 income-restricted affordable housing units, or 20% of the proposed 3,800 total units. 380 affordable to households earning 30% AMI, 190 affordable at 50% AMI and 190 affordable at 60% AMI. The redevelopment of the former Hillcrest golf course, The Heights, includes the production of 91 units (or more than 10% of the total units) to be affordable to households with income at 30% AMI or below, while 93 units (10.3% of the total number of units) will be restricted to households with income at 50% AMI, and 343 units (38.2% of the total number of units) will be restricted to households

## **SP-60 Homelessness Strategy – 91.215(d)**

### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The CoC and Ramsey County are actively exploring strategies to reduce the number of persons becoming homeless in the community by focusing on strategic homeless prevention efforts and the Coordinated Entry System (CES). The CES is designed to assess and connect people to available housing options.

In 2022, the CoC developed a new Prevention and Tenant Stability workgroup. The workgroup has undergone a multi-month gaps analysis process and has the following recommendations:

1. Work closely with the county's Emergency Assistance department and other prevention resources such as the Minnesota Housing Prevention and Assistance (FHPAP) programming to break down silos and make rental assistance more expeditious.
2. Bring on more landlords; and
3. Develop centralized websites and dashboards- streamlining all prevention resources

Since 2020, the CoC's Coordinated Entry Workgroup has implemented a series of initiatives that originated from recommendations from the Ramsey County 2020 CES Evaluation to improve outcomes. These include 1) Having Coordinated Entry Assessors provide trauma-informed care. The training, which occurred in September 2023, emphasized trauma-informed care, client choice, confidentiality, administration of the assessment, entering assessments into the Homeless Management Information System (HMIS), and coordinating with Day One Services, a statewide network of domestic sexual assault, human trafficking and youth and advocacy programs in Minnesota. 2) Developing the Transfers, Reviews and Accommodations in Coordinated Entry (TRACE) Committee. The TRACE Committee meets on an as needed basis and approves and prioritizes the clients to be considered first for eligible vacancies. A main gap (identified by community) is individuals and families requesting a transfer or identifying domestic violence situations while on housing weren't always getting the warm hand-off and access to safety planning services, as the two systems (DV and housing) are often too siloed. With the advent of a new DV Coordinated Entry-specific project, the community can confidently provide more adequate safety planning. 3) Revised its Anti-discrimination policy. The policy applies to staff, volunteers, and contractors, including CoC and ESG-funded agencies. This policy requires agencies comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws. 4) Incorporating Coordinated Entry-specific monitoring visits with CoC-funded organizations, which began in 2023. 5) Evaluating new project applications using the CoC Program Rating and Ranking Tool created primarily for Coordinated Entry and the Homeless Management Information System (HMIS) projects. The tools cover CoC threshold requirements, project performance measures, responses to local e-SNAPS applications, annual monitoring results, alignment with HUD NOFO policies and CoC Needs Assessment. 6) Conduct a CES policy review to identify existing policies that people with lived experience of homelessness,

providers, and CES Priority List Manager identify as creating barriers to access to CES and housing referral; 7) remove people from the priority list who have not been in contact with providers/CES priority list staff or show up in the City/Ramsey County HMIS for several years; 8) increase the number of people being assessed; 9) with post-assessment provide more connections to mainstream services (housing financial assistance, employment, landlord mediation), and 10) increase new landlord engagement/collaborations with the goal to create and increase housing options and reduces the wait time for housing.

The CoC and the City continue to actively engage people with lived experience of homelessness, homeless service providers, domestic violence service providers, and other community partners that serve the homeless population through regular meetings. These meetings provide a better understanding of the needs of both sheltered and unsheltered persons experiencing a housing crisis.

All ESG and HUD funded program staff are trained in conducting CES assessments and the HMIS intake process. At the program-level, for both ESG and other HUD funded programs, there is a requirement for specific documentation (per project and funding type) that must be included in a client's file: initial intake, eligibility forms, income verification, housing barriers matrix, housing stabilization plan, exit forms, etc. process. At the program-level, for both ESG and other HUD funded programs, there is a requirement for specific documentation (per project and funding type) that must be included in a client's file: initial intake, eligibility forms, income verification, housing barriers matrix, housing stabilization plan, exit forms, etc.

It is through this process that people experiencing homelessness and their providers can determine the best path to resources (health care, financial services, employment, support services, housing, etc.) to resolve the housing crisis and establish the necessary services to promote self-sufficiency and housing stability.

For example, a system gap identified in the 2020 and 2021 HHR Needs Assessment was the need for an outreach program specifically for families. Through City ESG funding, Ramsey County contracted with a provider to operate an outreach program specifically for this activity. The service needs for families are far different than other subpopulations of homeless and a dedicated family-specific outreach program was the best approach to meet the needs of marginalized families within the community.

### **Addressing the emergency and transitional housing needs of homeless persons**

The City has a Joint Powers Agreement through August 2026 with the County to allocate its ESG funds to partially fund emergency shelters, transitional housing services, street outreach to residents experiencing homelessness, homelessness prevention, and rapid re-housing programs that support the needs of homeless or those at risk of becoming homeless.

Youth - Salvation Army Booth Brown House: ESG funding helps support the operations of a youth emergency shelter. Programs serve homeless youth aged 18-21 and permanent

supportive housing is provided for youth aged 16-21. A comprehensive array of support services and case management from basic needs, life-skills classes, access to mainstream benefits, and ongoing services to support education, job training, and housing stability are provided.

Single Adults - Catholic Charities Higher Ground: ESG funding helps support the daily operations emergency shelters which target single adults. Basic needs and advocacy services are provided. The shelters are located close to Catholic Charities St. Paul Opportunity Center which provides residents with easy access to daily meals, county resources, on-sight health care, veterans services, and with access to public transportation. ESG funding also supports the low-barrier shelter for single men and women known as Model Cities' Safe Space.

Families - Catholic Charities Family Service Center and Interfaith Project Home: ESG funding supports daily shelter operations and essential services. Program services include shelter space, shower, laundry, meals, on-site medical and dental services, transportation assistance, housing navigation, transportation assistance, connections to benefits and advocacy. Children's services include mentoring, tutoring, and early childhood education. Note the Family Service Center is in Maplewood but serves full CoC area, benefiting the population experiencing homelessness in the CoC, primarily in the City of Saint Paul Transitional Housing: ESG funded programs such as street outreach and emergency shelter provide Coordinated Entry System (CES) assessments to determine the best housing option to meet the needs of the client. In some cases, clients need a Housing First model with time-limited supports to move on to self-sufficiency which is met through a transitional housing program.

New in 2023, the CoC prioritized the concept of a Single Point of Entry (SPE) into emergency shelter. This is a key, trauma informed practice that eases a homeless person's experience with securing a shelter bed. In short, customer service representatives will be available day and evenings and weekends to hold shelter beds- this replaces the current fragmented practice that currently makes clients participate in a nightly lottery or wait until 10 pm to find out if they have a bed.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.**

The City's ESG and County CoC programs work together to fund community services, including homelessness prevention programs. vision is to align local, state, and federal funding streams through the CoC with Ramsey County as the lead agency. Additionally, the City's CDBG funds have been allocated to the Block Nurse Program which utilizes volunteer and professional staff to help seniors remain safely in their homes with an enhanced quality of life.

Providers within the CoC, community service partners such as the Minnesota Assistance Council for Veterans, public service partners such as Ramsey County, Metro Transit Homeless Action Team, and SPPS work collaboratively to serve the needs of chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. Within the ESG-funded street outreach, emergency shelter, and homeless prevention programs, assessors are trained to facilitate a client's transition from homelessness to permanent housing. Permanent housing options may include rapid re-housing (RRH), permanent supportive housing (PSH), other permanent housing, and private/market rental housing. The City's St. Paul Residence provides permanent supportive housing for those with late-stage chronic alcoholism and for long term homeless residents using the Housing First Model.

According to the Heading Home Ramsey CoC 2024 Needs Assessment, there were 2,255 Ramsey County households on one of the three priority Coordinated Entry System (CES) lists in August of 2024. These are clients that have been assessed and are waiting for a housing referral based on the needs identified during assessment. The average time someone must wait on the priority list before being referred is around 220 days or seven months.

Considering the gap in the number of housing options available versus the need (i.e., people waiting), assessors are trained to determine the severity of the clients' level of need, which may prioritize them for housing. Additionally, during the engagement and assessment process, information is gathered to determine a client's unique immediate and ongoing service needs, identify assets and barriers to housing, and develop a plan to reduce the amount of time that a client is homeless. Ultimately, the desired outcome is to assist the client with ongoing support services to further housing stability and reduce the likelihood of returning to homelessness.

Saint Paul uses CDBG funds, HOME Funds, and Low-Income Housing Tax Credits, as appropriate, to construct or preserve affordable housing, including developing or preserving supportive housing for long-term homeless residents.

**Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving**

**assistance from public and private agencies that address housing, health, social services, employment, education or youth needs**

Ramsey County provides programs and counseling to previously institutionalized or homeless individuals through partnerships with nonprofit service providers to aid in the transition to permanent housing. This network provides emergency assistance, cash and food assistance, health insurance, security deposits, childcare, job training, transportation, medical/dental care, mental health counseling, chemical dependency treatment, life skills training, and job search assistance. City and CoC coordinate with services providers and county corrections staff to provide assessments and referrals to the Coordinated Entry System (CES) to prioritize people for services, i.e., emergency assistance, prevention, employment services, and housing.

Face to Face – Homeless Prevention: The target population is unaccompanied youth aged 18-24 at-risk of homelessness. Overall program demographics are youth of color, 15% have a long-term disability, nearly a third have children, and many have been in foster care or have experienced domestic violence.

The program provides both short-term and medium-term rental assistance based on individual need. On-going case management is provided to support employment, navigate insurance, WIC, achieve personal goals, and help youth find and retain permanent housing. Prevention assistance advances outcomes - reducing both the number of homeless youth and the number who become homeless for the first time.

Individuals and families at risk-of homelessness due to extremely low-income, discharged from institutions or age out of foster care, and/or currently receiving other public, non-profit or private sector services may be directed to prevention services by contacting United Way 211, calling providers directly or accessing HHR's website for resource and intake information.

New in 2023, the Single Point of Entry (SPE) project also includes the development of two diversion case managers. So, any individual new to shelter access will be engaged with diversion tactics designed to prevent or mitigate entry into shelter or long-term shelter stays.

## **SP-65 Lead based paint Hazards – 91.215(i)**

### **Actions to address LBP hazards and increase access to housing without LBP hazards**

The City continues to comply with HUD regulations concerning lead-based paint (LBP), including notifying applicants of the lead requirements, performing lead screening, requiring abatement by certified workers, and completing clearance testing on HUD-funded housing projects. The City will also continue to work with Ramsey County through referrals to its Lead Window Replacement Program for homes and rental units with young children (most at risk of lead poisoning), identified lead paint issues, and whose gross household income is at or below 80% AMI. The program is available to both owner-occupied housing and rental property owners.

### **How are the actions listed above related to the extent of lead poisoning and hazards?**

Research indicates that the greatest lead risk to children is from the lead dust from deteriorated paint on windowsills, 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.

The required Lead Risk Assessment will identify all and any potential lead hazards present in the home and garage. All potential lead hazards are written into the scope of work for lead hazard reduction work with a final lead clearance test performed to confirm lead dust levels are below the regulatory dust-lead hazards standard.

### **How are the actions listed above integrated into housing policies and procedures?**

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.

#### **Rehabilitation Programs:**

- Applicants receive the required lead-based paint information and understand their responsibilities.
- Staff properly determine whether proposed projects are exempt from some or all lead-based paint requirements.
- The level of federal 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.

### **Continuation of integrated housing policies and procedures**

#### **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.

## **SP-70 Anti-Poverty Strategy – 91.215(j)**

### **Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families**

Critical to reducing poverty is workforce development and skills training and access to economic opportunity. The City's strong partnership with Ramsey County combines Workforce Innovation and Opportunity Act (WIOA) funds with state and local funds through a Joint Powers Agreement. Most of the workforce development investments are managed by Ramsey County Workforce Solutions and overseen by a City-County Workforce Innovation Board (WIB). The City invests directly in youth internships, scholarships for technology certification programs, workforce counseling and programs that support businesses and create jobs for low/moderate-income persons.

Department of Human Rights and Equal Economic Opportunity (HREEO) - deals with discrimination issues and provides access to economic opportunities through inclusive contracting practices and workforce development policies. The HUD Section 3 Program gives low-income and public housing residents and businesses a connection to jobs, training and contracting opportunities. The City of Saint Paul is also the lead agency for the Twin Cities Section 3 Collaborative, which comprises of Saint Paul and Minneapolis, Minneapolis Public Housing Authority, Ramsey, Hennepin and Anoka Counties and Community Development Agencies of Washington and Dakota Counties.

Full Stack – a public-private collaboration with a renewed focus on using the power of tech and innovation to leverage equitable, sustainable, resilient economic development in Saint Paul.

Minimum Wage Ordinance – sets the lowest hourly pay rate for work done in Saint Paul. The minimum wage varies based on a business's size and increases in phases. The City will require businesses of all sizes to pay their employees a minimum wage of \$15 an hour by 2027.

Office of Financial Empowerment - Saint Paul established the Office of Financial Empowerment (OFE) in 2019 because economic inequality is a whole-city crisis that demands a whole-city response. OFE is working deliberately to help a new generation of Saint Paul residents repair those generational injustices and build equitable economic power for decades to come.

- OFE welcomes every new baby to our city with \$50 in a college savings account — a small but powerful investment in each child's boundless potential — through the CollegeBound Saint Paul program. CollegeBound also provides opportunities for families to grow the account and earn bonus deposits through engaging in the program or completing activities related to the development of their child or their family's financial stability.
- OFE leads the City's strategy around guaranteed income which provides monthly unrestricted cash to eligible families with children with CollegeBound accounts. The People's Prosperity Pilot provided 150 families with \$500 a month for 18 months, and research results showed positive trends in employment, physical and mental health, and other indicators of well-being and

quality of life. The current program CollegeBound Boost provides 333 families with \$500 for 24 months.

- OFE oversees the Medical Debt Reset Initiative, which is a partnership with national nonprofit Undue Medical Debt to acquire and cancel an estimated \$110 million in medical debt for Saint Paul residents. Medical debt poses a large financial burden for many individuals and families, and by easing this burden, the City helps residents build health and wealth in their communities.
- OFE manages the LOCAL Fund which uses shared ownership models to build local economic wealth among Saint Paul residents and small businesses. The LOCAL Fund aims to achieve healthy and sustainable neighborhoods through recovery of vacant and abandoned properties and to mitigate the enduring economic impacts of the pandemic on small businesses.

Open for Business – a one-stop shop for start-up and existing businesses to get information and leverage resources. The program provides a pocket guide (in several languages) to starting a business in Saint Paul; connection with information and resources to start, move or expand a business; and help from a Business Project Facilitator as a guide through the permitting and licensing process of opening, expanding or moving to the City.

### **How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan**

Saint Paul has programs and policies with 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. Human/public service activities which help 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, Diversionary Work Program, medical assistance, childcare 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 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.

## **SP-80 Monitoring – 91.230**

**Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements**

The City's Grants Management division of the Planning and Economic Development Department serves as the City's overall grant administrator ensuring compliance with all pertinent CDBG, HOME and ESG program regulations and requirements and ensuring all activities meet intended goals, including timely expenditure of funds. The City uses an outside consultant to assist in monitoring its CDBG subgrantees and to ensure that HOME-assisted units meet rent, occupancy, income and property standards requirements through the property's affordability period. Listed below are the major components of the City's ongoing monitoring system.

**Proposal Reviews** – All projects and programs proposed to receive HUD funding are reviewed by staff to determine if the activity is eligible, meets a national objective, and is in conformance with the Consolidated Plan.

**Contracts** – All non-City entities receiving CDBG, HOME or ESG funding are required to enter into a written agreement with the City. This agreement identifies all applicable federal, state and local regulations and compliance requirements associated with the activity. The agreement identifies specific activities to be carried out, timeline for carrying out the activities, and a detailed budget.

**Desk Monitoring** – Each time a reimbursement is requested for either a City or subgrantee administered activity, documentation of the expenses, and a report which updates the progress and accomplishments of the activity must be included. Reimbursement requests are reviewed for accuracy by the City project manager and accounting staff before reimbursements are made.

**On-Site Monitoring** – In addition to using an outside consultant, City staff conducts site visits to subgrantees receiving HUD funds for 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. On-site monitoring examines subgrantees' financial systems and controls, cost reasonableness of activities, income and program 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 annually. The CAPER details the progress and accomplishments of CDBG, HOME and ESG funded activities. CAPER data is taken from report forms submitted with each project or program

reimbursement request, which allows for tracking progress of HUD-funded activities on an on-going basis. The City also updates the HUD reporting system (IDIS) throughout the year.

**Labor Standards and Section 3** – The City monitors contract compliance for labor standards and Section 3 through B2GNow, which has a certification portal for CERT (a small business certification program recognized by Hennepin County, Ramsey County, the City of Minneapolis and the City of Saint Paul and certifies Minority-Owned Business Enterprise (MBE), Women-Owned Business Enterprise (WBE), and Small Business Enterprise (SBE)). Once a business certifies, the certification carries over to the compliance module, enabling contractors to search for certified subs. The system audits projects monthly to confirm payments to subcontractors. The Department of Human Rights and Equal Employment Opportunity (HREEO) staff monitor all compliance. Payment approval goes through HREEO, and HREEO holds draws until contractors are compliant. For Section 3, the City uses the same compliance monitoring program through B2GNow to ensure compliance.

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

The City expects to receive funding allocations in 2025 similar to its 2024 allocations: \$6,765,326 in CDBG funding, \$1,534,711 in HOME funding, and \$591,281 in ESG funding from HUD in 2025. In addition, the City estimates using about \$235,000 in CDBG program income and approximately \$206,000 in HOME program income. Program income is directly generated from a CDBG or HOME program funded activity, such as loan repayments. Because the federal budget allocations for 2025 are not yet passed upon drafting this Plan, the City has a contingency plan for different funding amounts. Should the City receive an amount higher or lower than the estimates from last program year, all activities will be adjusted in direct proportion to the difference in actual allocations and program income estimates will be re-evaluated.

The City has identified State, local, and private resources expected to be available to leverage and/or match HUD funding to address priority needs and the objectives put forward in the Strategic Plan. These resources may include:

- Local Housing Trust Fund
- Sales Tax Revitalization program (STAR) – ½ cent sales tax for community development investments
- Housing and Redevelopment Authority (HRA) revenues
- City Tax Increment Financing, Low-Income Housing Tax Credits Issuance of Housing Revenue and 501(c)3 Conduit Revenue Bonds
- Continuum of Care resources
- Private match for ESG investments
- Private match for HOME capital investments
- Minnesota Department of Employment and Economic Development (DEED) business loans and brownfield remediation and

- development grants
- Minnesota Housing Finance Agency (MNFA)
- Metropolitan Council brownfield remediation and community development grants

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Admin and Planning</li> <li>• Economic Development</li> <li>• Housing</li> <li>• Public Improvements</li> <li>• Public Services</li> </ul>	6,765,326	234,674	0	7,000,000	35,000,000	Assumes steady funding.
HOME	public - federal	<ul style="list-style-type: none"> <li>• Acquisition</li> <li>• Homebuyer assistance</li> <li>• Homeowner rehab</li> <li>• Multifamily rental new construction</li> <li>• Multifamily rental rehab</li> <li>• New construction for ownership</li> <li>• TBRA</li> </ul>	1,534,711	206,225	0	1,740,936	8,704,682	Assumes steady funding.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	<ul style="list-style-type: none"> <li>• Conversion and rehab for transitional housing</li> <li>• Financial Assistance</li> <li>• Overnight shelter</li> <li>• Rapid re-housing (rental assistance)</li> <li>• Rental Assistance Services</li> <li>• Transitional housing</li> </ul>	591,281	0	0	591,281	2,956,405	Assumes steady funding.

**Table 54 - Expected Resources – Priority Table**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

HUD requires that all participating jurisdictions (PJ) match, with non-federal funds, no less than 25 cents for each dollar of HOME funds spent on affordable housing. The City again received a match reduction of 50 percent due to fiscal distress and is required to match each dollar spent with 12.5 cents of non-federal match. The City will continue to leverage private and public funds for HOME-funded affordable housing and

accumulate additional match.

ESG grant regulations require that grant funds be matched 100 percent or dollar for dollar. If any match is federal, the laws governing a particular source of federal funds must not prohibit these funds from being used as match to ESG. Additionally, if the ESG funds are used to satisfy match requirements of another federal program, then funding from that program may not be used as match for ESG.

Match requirements will be satisfied, as follows, when paid with non-ESG funds:

- In-kind donations
- Private donations
- Private foundation grants/funds
- Unrestricted federal, state, and local funds

The City actively pursues and/or requires developers to apply for State funding programs to include Minnesota Housing Finance Agency, Minnesota State General Obligation (GO) Bonds, the Minnesota Department of Employment and Economic Development (DEED), Metropolitan Council, and the Federal Home Loan Bank's Affordable Housing program. Private funding comes from foundations, fund raising, conventional loans, and developer cash and equity. City funding may include the local Housing Trust Fund, Housing and Redevelopment Authority (HRA) funds, LIHTC, TIF, Conduit Revenue Bonds, local sales tax dollars (STAR program), and discounted City/HRA owned land.

**If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The City owns property which may be suitable for development and offers these properties for sale for redevelopment through request for proposal process or other mechanisms to solicit competitive offers.

**Discussion**

The City expects to receive funding allocations in 2025 similar to its 2024 allocations: \$6,765,326 in CDBG funding, \$1,534,711 in HOME funding, and \$591,281 in ESG funding from HUD in 2025. In addition, the City estimates using about \$235,000 in CDBG program income and approximately \$206,000 in HOME program income. Program income is directly generated from a CDBG or HOME program funded activity, such as loan repayments. Because the federal budget allocations for 2025 are not yet passed upon drafting this Plan, the City has a contingency plan for different funding amounts. Should the City receive an amount higher or lower than the estimates from last program year, all activities will be adjusted in direct proportion to the difference in actual allocations and anticipated Program Income may be adjusted. The City expects to meet matching dollar requirements from various City and developer sources, and expects to use City-owned property for development in certain cases.

## **Annual Goals and Objectives**

### **AP-20 Annual Goals and Objectives**

#### **Goals Summary Information**

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Homeless Prevention	2025	2030	Homeless	Citywide	Homeless prevention	ESG: \$591,281	Homelessness Prevention: 3,000 Persons Assisted
2	Development of New Housing	2025	2030	Affordable Housing	Citywide	Development of new affordable housing	CDBG: \$220,000 HOME: \$1,566,843	Rental units constructed: 15 Household Housing Unit
3	Rental Housing Rehabilitation	2025	2030	Affordable Housing	Citywide	Preservation of existing affordable housing	CDBG: \$1,220,000	Rental units rehabilitated: 25 Household Housing Unit
4	Homeowner Housing Rehabilitation	2025	2030	Affordable Housing	Citywide	Support stable, affordable, safe homeownership	CDBG: \$2,132,000	Homeowner Housing Rehabilitated: 50 Household Housing Unit
5	Public Services	2025	2030	Non-Housing Community Development	Citywide	Public service needs	CDBG: \$83,000	Public service activities other than Low/Moderate Income Housing Benefit: 3,000 Persons Assisted
6	Community Engagement	2025	2030	Non-Housing Community Development	Citywide	Community outreach to underserved populations	CDBG: \$345,000	Public service activities other than Low/Moderate Income Housing Benefit: 181,300 Persons Assisted
7	Youth Employment	2025	2030	Non-Housing Community Development	Citywide	Public service needs	CDBG: \$540,000	Public service activities other than Low/Moderate Income Housing Benefit: 250 Persons Assisted
8	Economic Development	2025	2030	Non-Housing Community Development	Citywide	Economic development and job growth	CDBG: \$365,000	Businesses assisted: 15 Businesses Assisted
9	Remediation of Substandard Properties	2025	2030	Non-Housing Community Development	Citywide	Acquisition, demolition, and clearance of property	CDBG: \$140,000	Buildings Demolished: 17 Buildings

10	Public Improvements	2025	2030	Non-Housing Community Development	Citywide	Public facilities and infrastructure	CDBG: \$550,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1000 Persons Assisted
11	NRSA - Railroad Island/Hamms	2025	2030	Affordable Housing Non-Housing Community Development	Citywide	Preservation of existing affordable housing Development of new affordable housing Support stable, affordable, safe homeownership Economic development and job growth	CDBG: \$5000	Homeowner Housing Added: 2 Housing Units

Table 55 – Goals Summary

**Goal Descriptions**

1	Goal Name	Homeless Prevention
	Goal Description	Homeless prevention, shelter operations, essential services, street outreach, rapid re-housing.
2	Goal Name	Development of New Housing
	Goal Description	Address the need for affordability of decent housing by supporting the development of new housing.

3	<b>Goal Name</b>	<b>Rental Housing Rehabilitation</b>
	<b>Goal Description</b>	Address the need of sustaining decent housing by providing rehabilitation assistance to rental housing occupied by low/moderate-income households.
4	<b>Goal Name</b>	<b>Homeowner Housing Rehabilitation</b>
	<b>Goal Description</b>	Address the need of sustaining decent housing by providing rehabilitation assistance to homeowner housing occupied by low/moderate-income households.
5	<b>Goal Name</b>	<b>Public Services</b>
	<b>Goal Description</b>	Improve the availability of a suitable living environment by funding public service activities.
6	<b>Goal Name</b>	<b>Community Engagement</b>
	<b>Goal Description</b>	Address the sustainability of a suitable living environment by providing funding for public information & crime prevention programs.
7	<b>Goal Name</b>	<b>Youth Employment</b>
	<b>Goal Description</b>	Address the availability of economic opportunity by providing employment opportunities and training to city youth.
8	<b>Goal Name</b>	<b>Economic Development</b>
	<b>Goal Description</b>	Address the sustainability of economic opportunity by assisting businesses with rehabilitation or economic development activities.
9	<b>Goal Name</b>	<b>Remediation of Substandard Properties</b>
	<b>Goal Description</b>	Address the sustainability of a suitable living environment by acquiring or demolishing substandard properties.

10	<b>Goal Name</b>	<b>Public Improvements</b>
	<b>Goal Description</b>	Address the sustainability of a suitable living environment by renovating existing public facilities in need of improvements.
11	<b>Goal Name</b>	<b>NRSA - Railroad Island/Hamms</b>
	<b>Goal Description</b>	Direct targeted investments for housing and economic development to the Railroad Island/Hamms area neighborhood revitalization strategy area.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The project summary information provides a description and funding amount for each of the projects the City plans to undertake in program year 2025 with CDBG, HOME, and ESG program funding. The Capital Improvement Budget Committee (CIB) recommended capital projects through the two-year 2024-2025 capital improvement budget process, see Attachments A and C.

#### Projects

#	Project Name
1	Acquisition Activities
2	Clearance Activities
3	Neighborhood Non-Profits
4	Community Engagement
5	Youth Employment
6	Housing Construction
7	Single-Unit Rehabilitation
8	Multi-Unit Rehabilitation
9	Commercial Corridor and Citywide Economic Development
10	Public Facilities Activities
11	Emergency Solutions Grant Activities
12	Planning and Administration
13	NRSA Railroad Island/Hamms

**Table 56 – Project Information**

#### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Capital project priorities for CDBG funding were recommended by the Capital Improvement Budget (CIB) Committee. Recommendations were based upon consolidated plan priority needs and goals, strength of proposals, staff rankings, public input, and available resources. The primary obstacle to addressing underserved needs continues to be the reduction in funding available and the increasing demand for services and affordable housing (single-family, multi-family, for sale and rental).

HOME program funding partially finances the development of new affordable housing citywide. Through CDBG program funding, HOME and local sources, single-family development is planned for the upcoming year to provide much needed homeownership opportunities and fill the gap in available decent, safe, affordable housing for households below 80% AMI. The primary obstacle is limited or

decreasing funding and developable land.

The City's ESG grant is administered in coordination with Ramsey County Housing Stability Department, whose staff plays a pivotal role in Heading Home Ramsey (HHR), CoC, leadership, data, and evaluation support staff, and nongovernmental homeless services providers.

## AP-38 Project Summary

### Project Summary Information

1	<b>Project Name</b>	<b>Acquisition Activities</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Remediation of Substandard Properties
	<b>Needs Addressed</b>	Pre-development support, including lead-based paint abatement; acquisition, demolition, and clearance of property
	<b>Funding</b>	CDBG: \$220,000
	<b>Description</b>	Funds are requested for the HRA to acquire strategic, hazardous and/or blighted properties for reuse as determined by input and support from the applicable recognized community organizations representing the neighborhood in which the property is located.
	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will have an indirect benefit to neighboring residents.
	<b>Location Description</b>	Activities are available to eligible properties citywide.
	<b>Planned Activities</b>	Acquisition of vacant, underutilized properties, and related demolition and/or relocation costs. This funding has historically been used for larger development sites. Substandard structures will be cleared, and the sites will be redeveloped.
2	<b>Project Name</b>	<b>Clearance Activities</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Remediation of Substandard Properties
	<b>Needs Addressed</b>	Pre-development support, including lead-based paint abatement; acquisition, demolition, and clearance of property
	<b>Funding</b>	CDBG: \$140,000

	<b>Description</b>	Citywide, multi-year program to provides resources to clear buildings are considered nuisance properties, and/or pose a threat to public health and safety. Properties must have been 1) vacant for at least one year; or 2) vacant and unfit for habitation for at least 90 days. These structures are typically identified on the City's vacant building list. The program is administered by City Code Enforcement staff in the Department of Safety and Inspections.
	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will have an indirect benefit to neighboring residents.
	<b>Location Description</b>	Activities will be carried out citywide on a spot-by-spot basis.
	<b>Planned Activities</b>	Demolition of vacant buildings considered nuisance properties that pose a threat to public health and/or safety.
<b>3</b>	<b>Project Name</b>	<b>Neighborhood Non-Profits</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public Services
	<b>Needs Addressed</b>	Public services, including tenant and landlord education
	<b>Funding</b>	CDBG: \$83,000
	<b>Description</b>	Public service activities could include fair housing activities, community engagement, domestic violence prevention, criminal restorative justice, health care, employment training, conflict resolution, and emergency shelter.
	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 3,000 low/moderate income persons will be assisted through programs funded with CDBG.
	<b>Location Description</b>	Activities will be carried out citywide.

	<b>Planned Activities</b>	Assistance to public service programs administered by nonprofit organizations throughout the City. Programs could include services for children, youth, families, senior citizens, domestic violence prevention, citizen participation, conflict resolution, emergency shelter, and community restorative justice.
4	<b>Project Name</b>	<b>Community Engagement</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Community Engagement
	<b>Needs Addressed</b>	Community outreach and engagement
	<b>Funding</b>	CDBG: \$345,000
	<b>Description</b>	The program provides funding for District Councils in Planning Districts 1-8, 11, and 17 for crime prevention, community outreach and development, and policy development activities. The program also receives City General Fund local funding.
	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	CDBG funds will be used for activities in the CDBG-eligible areas of the city. Approximately 181,300 low- to moderate-income residents will be assisted with the CDBG funds. Local funding is available for non-CDBG eligible areas.
	<b>Location Description</b>	CDBG-eligible districts 1-8, 11, and 17.
<b>Planned Activities</b>	Crime prevention, community development, and policy development activities.	
5	<b>Project Name</b>	<b>Youth Employment</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Youth Employment
	<b>Needs Addressed</b>	Public services, including tenant and landlord education
	<b>Funding</b>	CDBG: \$540,000
	<b>Description</b>	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.

	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Youth from approximately 250 low/moderate-income families will benefit from employment training and internships.
	<b>Location Description</b>	All City of Saint Paul youth from low- to moderate- income households are eligible to participate.
	<b>Planned Activities</b>	Services income remedial education, classroom and occupational skills training, and part-time employment.
<b>6</b>	<b>Project Name</b>	<b>Housing Construction</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Development of New Housing NRSA- Railroad Island/HAMMS
	<b>Needs Addressed</b>	Development of new affordable housing
	<b>Funding</b>	CDBG: \$220,000 HOME: \$1,566,843
	<b>Description</b>	This project will produce new units of housing either by rehabilitating vacant structures or with new construction activities, both of which may include acquisition, demolition and relocation.
	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 15 low/moderate-income families will benefit from the investment in newly constructed affordable rental units.
	<b>Location Description</b>	Project sites to be determined.
	<b>Planned Activities</b>	New units of housing either by rehabilitating vacant structures or with new construction activities, both of which may include acquisition, demolition and relocation.
<b>7</b>	<b>Project Name</b>	<b>Single-Unit Rehabilitation</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Homeowner Housing Rehabilitation
	<b>Needs Addressed</b>	Support stable, affordable, and well-maintained homeownership

	<b>Funding</b>	CDBG: \$2,132,000
	<b>Description</b>	The City and local CDCs administer loan programs that assist low-income households to rehabilitate their homes by addressing CDBG-eligible uses (i.e. building code enforcement, lead paint abatement, hazardous waste treatment, handicap accessibility, energy improvements, and window, roof and siding replacement, etc.). Funds are also used for emergency repair of water/sewer lines, deficient furnaces and water heaters.
	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 50 low/moderate-income households will benefit from this activity.
	<b>Location Description</b>	CDBG-eligible households throughout the City are eligible for this activity.
	<b>Planned Activities</b>	Financing to assist income-eligible owner occupants of single-family and duplex properties.
8	<b>Project Name</b>	<b>Multi-Unit Rehabilitation</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Rental Housing Rehabilitation
	<b>Needs Addressed</b>	Preservation of existing affordable housing
	<b>Funding</b>	CDBG: \$1,000,000
	<b>Description</b>	Assist in financing the preservation, rehabilitation or new production of affordable housing. Implement CDBG and HOME eligible activities related to acquisition and related costs (e.g. relocation, demolition, site preparation, and adjacent public improvements), rehabilitation, new construction, and related costs that are part of the total development cost of a housing project.
	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 25 low/moderate-income households will benefit from this activity.
	<b>Location Description</b>	Projects will be selected throughout the city.

	<b>Planned Activities</b>	Financing to assist in the preservation, rehabilitation or new production of affordable housing.
<b>9</b>	<b>Project Name</b>	<b>Commercial Corridor and Citywide Economic Development</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Economic Development
	<b>Needs Addressed</b>	Economic development and job growth
	<b>Funding</b>	CDBG: \$365,000
	<b>Description</b>	Activities carried out by the City or its CDC partners to assist businesses with expansion, property acquisition, rehabilitation, energy conservation improvements, leasehold improvements, and development citywide.
	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The activity will assist businesses that either serve low- to moderate-income areas or create jobs for low- to moderate-income persons. It is estimated that 15 businesses will be assisted.
	<b>Location Description</b>	This activity is available to eligible businesses citywide.
	<b>Planned Activities</b>	Activities to assist businesses with expansion, property acquisition, rehabilitation, energy conservation improvements, leasehold improvements, and development citywide.
<b>10</b>	<b>Project Name</b>	<b>Public Facilities Activities</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Public Improvements
	<b>Needs Addressed</b>	Improve public infrastructure, city facilities, and community spaces
	<b>Funding</b>	CDBG: \$550,000
	<b>Description</b>	Citywide facilities improvements and activities for publicly owned or non-profit owned facilities open to the general public. Activities may include infrastructure improvements; neighborhood facilities such as libraries, parks, and playgrounds; or facilities for persons with special needs such as facilities for people experiencing homelessness.
	<b>Target Date</b>	12/31/2026

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Number of families that will benefit from activities will depend on the specific activities and their service areas.
	<b>Location Description</b>	Eligible projects city wide.
	<b>Planned Activities</b>	Activities include facilities improvements and activities such as infrastructure improvements, neighborhood facilities, or facilities for persons with special needs.
<b>11</b>	<b>Project Name</b>	<b>ESG25SaintPaul</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Homeless Prevention
	<b>Needs Addressed</b>	Emergency shelters, unsheltered prevention and support services
	<b>Funding</b>	ESG: \$591,281
	<b>Description</b>	Activities to include homeless prevention, shelter operations, essential services, street outreach, rapid re-housing, and ESG administration. Funding for emergency shelter operations and street outreach will not exceed 60% of ESG funding award and no more than 7.5% for administrative costs. Ramsey County will manage the City's ESG program under the terms of a Joint Powers Agreement.
	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 3,000 individuals and families experiencing homelessness or at risk of homelessness will be assisted.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Activities include homeless prevention services, emergency shelters operating costs, essential services, street outreach, rapid re-housing, and ESG administration.
<b>12</b>	<b>Project Name</b>	<b>Planning and Administration</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Community Engagement
	<b>Needs Addressed</b>	Community planning needs

	<b>Funding</b>	CDBG: \$1,400,000 HOME: \$174,094
	<b>Description</b>	Funding for: management, coordination, oversight, and monitoring of the CDBG and HOME programs; costs included in the City's approved Indirect Cost Plan; planning activities in CDBG eligible areas of the City; environmental and historic reviews of HUD funded projects.
	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This activity will indirectly benefit all low/moderate-income households citywide.
	<b>Location Description</b>	This activity will not benefit a physical location.
	<b>Planned Activities</b>	Funds are budgeted to pay salary and operating costs for overall administration and coordination of budget development, citizen participation, reporting, and compliance for Consolidated Plan grants. Staff includes Managers, Financial Analysts, Compliance Coordinators, IDIS Coordinator, and Administrative Support.
<b>12</b>	<b>Project Name</b>	<b>NRSA Railroad Island/Hamms</b>
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Development of new housing
	<b>Needs Addressed</b>	Development of new affordable housing
	<b>Funding</b>	CDBG: \$5,000
	<b>Description</b>	Targeted activities related to work done within the boundaries of the NRSA serving Railroad Island/Hamms
	<b>Target Date</b>	12/31/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	TBD - specific projects will be assigned. We estimate 2 properties, at minimum will be assisted within the NRSA, but subrecipient contracting will determine exact amount of funds and homeowner housing units assisted.
	<b>Location Description</b>	Boundaries of this NRSA reflect the census tracts community of Railroad Island and adjacent Hamms redevelopment site

<b>Planned Activities</b>	Funds for subrecipients budgeted for CDBG activities in their service areas will be moved into the project to reflect location in the NRSA when applicable. One subrecipient selected through the CIB process undertakes several housing development related activities in the Railroad Island community and those activities will be tracked for NRSA reporting and a workplan developed in its subrecipient agreement.
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## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

None of the 2025 activities have an address-specific location. All the activities described in the AAP are programs which are available citywide or have service areas that include one or more neighborhoods (districts) in the city. A map showing the areas of the city with at least 51% low/moderate income persons is titled as CDBG-Eligible Census Tracts is in Attachment D All activities providing an area benefit being carried out in PY 2025-26 will have a service area that is located primarily in a shaded portion 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 sub-grantees are available to income eligible households located in the neighborhoods served by the sub-grantee.

Activities carried out for the ESG program through Ramsey County are available citywide and are part of broader Continuum of Care area coordination of resources.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Citywide	100

**Table 57 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

By allocating investments citywide, the City is working to prevent additional concentrations of low income and minority populations through targeted affordable housing development which will provide expanded access to economic, employment, and housing options for low- and moderate-income residents citywide.

### **Discussion**

HUD funding will continue to be used for housing activities citywide. Public infrastructure projects in low- and moderate-income areas will utilize CDBG funds in conjunction with local (local bonds, TIF) and state funds (state municipal aid, Minnesota Department of Transportation), providing improvements citywide for the benefit of all residents.

A portion of CDBG funds will be targeted as appropriate to the Railroad Island/Hamms Neighborhood Revitalization Strategy Area.

The ESG funding activities are available citywide and benefit Saint Paul, but as part of CoC resource coordination will include some beneficiaries residing outside of the City of Saint Paul but within the broader CoC area. As the City of Saint Paul includes most people experiencing homelessness in the broader CoC, the proportion of beneficiaries residing outside of the City is expected to be reasonable, documented as practicable, and will not include a specific percentage of funds that would be targeted.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

This section indicates the number of affordable units that are estimated to be provided through HOME and CDBG funding.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	95
Special-Needs	0
Total	0

**Table 58 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	20
Rehab of Existing Units	75
Acquisition of Existing Units	0
Total	0

**Table 59 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

In 2025, the City estimates providing funding for the construction of 15 new affordable rental units through HOME and CDBG. It is estimated that CDBG will fund the construction and/or the acquisition/rehabilitation/resale of 5 homeownership units. The City will continue its citywide owner-occupied home rehab program as well as continuing to fund and work with its non-profit partners resulting in an estimated 50 owner-occupied homes rehabilitated – a strategic effort to preserve affordable housing. CDBG funding will also be available for the rehabilitation of existing affordable rental

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Saint Paul Public Housing Agency (PHA) is an important provider of affordable housing for thousands of Saint Paul households with the greatest need (households at or below 30% of AMI).

The PHA owns and manages 418 public housing units and 3,836 units with Project-Based Rental Assistance (PBRA) that were converted from public housing via HUD's Rental Assistance Demonstration (RAD) effective January 1, 2020. The PHA also administers 5,243 Housing Choice Vouchers (as of January 2025). These include 175 Family Unification Program (FUP) vouchers, 318 Mainstream Program/Disability vouchers, 276 Veterans Affairs Supportive Housing (VASH) vouchers and 157 Emergency Housing Vouchers (EHV). PHA has allocated 864 project-based vouchers (PBVs); and more than half of those (510) are in supportive housing developments. In total, the PHA provides nearly 9,500 affordable homes to more than 21,000 people.

The Annual Agency Plan for Federal FY 2025 (PHA's Fiscal Year 2026, beginning April 1, 2025), and the Five-Year Capital Fund Plan are available on the PHA website at: <http://www.STPHA.org/>.

The PHA has maintained its High Performer status under HUD's Public Housing Assessment System (PHAS) for 32 consecutive years. The PHA does not administer HOPE VI activities or Mixed-Finance Modernization and Development. PHA has also maintained its High Performer status under HUD's Section 8 Management Assessment Program (SEMAP) for 23 consecutive years. The PHA successfully implements and administers current agreements for Project-Based Vouchers (PBV); including PBV in supportive housing that supports the State of Minnesota, Ramsey County, and the City of Saint Paul with their plans to end homelessness.

### **Actions planned during the next year to address the needs to public housing**

**Remaining Public Housing Program** – 418 scattered site single family homes and duplexes remain in the public housing program. The PHA is committed to preserving these homes as safe, affordable, quality housing for low-income families. The current PHA Annual Agency Plan notes that the PHA is exploring asset repositioning strategies for these homes to increase funding to preserve and maintain them as deeply affordable housing.

**Capital Improvements** – PHA will use HUD Capital Fund Program funds (for public housing units) and Housing Assistance Payments (HAP) for PBRA units, to renovate and modernize them with emphasis on fire and life safety improvements and sustainable designs to conserve energy and water. PHA will continue to seek grants and forgivable loans from Minnesota Housing, Ramsey County, and the City of

St. Paul, as well as other sources.

**Project-Based Vouchers (PBV)** – PBVs awarded by the PHA subsidize rental units in privately-owned mixed-income, supportive housing and other affordable housing developments, in collaboration with community partners-City, Ramsey County, St. Paul Foundation, and others. PHA Board will consider staff's recommendations for awarding more vouchers for PBV use.

In the coming year the PHA will continue administering HCVs from special HUD programs:

- VASH-Assists homeless veterans receiving services from the Veterans Administration
- Mainstream Program - Housing Opportunities for Persons with Disabilities. Assists households that include persons with disabilities, in collaboration with several community social service agencies.
- Family Unification Program Vouchers (FUP) - In collaboration with Ramsey County's Child Protection Unit, helping families secure stable housing and be unified with their children. FUP also serves 18–24-year-olds who have aged out of or left foster care at age 16 or older, who are homeless or at risk of becoming homeless.
- Emergency Housing Vouchers (EHV) – The PHA received EHV vouchers from HUD in 2021. Working with partner agencies, the PHA issued the vouchers to individuals and families who are homeless or at risk of homelessness, fleeing domestic violence, etc., in accordance with the requirements in the “American Rescue Plan Act.” These vouchers cannot be reissued after 9/30/2023.

**Tenant Protection/Preservation Vouchers (TPV)** – Prevent displacement of low-income residents when a previously-subsidized rental property is no longer subject to income-restrictions.

**Public Housing Waiting List** – The Public Housing waiting list opened 4/21/2022 and closed 6/20/2022. As of 1/1/2025 there were 5,544 applicants on the Multifamily/PBRA waiting list for apartments in hi-rises and family townhome developments. The public housing waiting list (1,901 applicants) is for single family homes and duplexes. Even when waiting lists are closed, the PHA still accepts applications for 2 programs with special services in PHA-owned housing: Congregate Housing Services Program (CHSP) and the Wilder Customized Living Services program, both provide services to allow for independent living.

**HCV waiting list** – Opened for applications for 1 week in November 2024. By a random computer drawing, 1,200 applicants were placed on the waiting list from 7,700 applications received. The PHA expects the 1,200 to be served in 1-2 years. As of 1/1/2025, about 1,700 applicants remained on the waiting list. When the regular HCV waiting list is closed, clients can still apply for vacancies at some housing projects with PBVs. Those vacancies are offered through the Ramsey County Coordinated entry. PHA describes other referral-based applications in the “How to Apply” section for HCVs on the PHA's

website.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

The PHA's Resident Services and Resident Initiatives Departments support Resident Councils in every hi-rise and family housing development. Each Resident Council works to increase resident involvement in their public housing communities and empower residents to take action to achieve personal goals of self-sufficiency. The leaders of the individual Resident Councils meet regularly as the Hi-Rise Presidents Council and the Citywide Residents Council.

Since 1999, the Saint Paul Public Housing Agency (PHA) Board of Commissioners has established the PHA's Resident Advisory Board (RAB) with membership to be comprised of:

- Section 8 representatives who volunteered for the RAB in response to mailings and flyers.
- Resident representatives from the PHA's Public Housing scattered site single family homes and duplexes.
- Two PHA Commissioners who are Public Housing residents – 1 Commissioner represents hi-rise residents, and 1 Commissioner represents family residents. RAB membership fluctuates due to changes residents moving out of public housing or leaving the Section 8 program, etc. RAB meeting agendas are sent to all RAB members and Southern Minnesota Regional Legal Services, Inc. (SMRLS).

The PHA actively encourages discussions about planning capital improvements and PHA policies. During the year, PHA Senior Management meets with members of the RAB to discuss any significant PHA policy changes, the PHA Annual Plan, and PHA Capital Improvements. Additionally, the PHA's Resident Initiatives Department and Resident Councils work together to form new partnerships with community and supportive service agencies.

**Section 3** - PHA provides economic opportunities for low-income residents, to the greatest extent feasible, by hiring qualified Section 3 PHA residents, contracting with Section 3 businesses, and including Section 3 requirements in all contracts. The PHA's Resident Initiatives Department also identifies resources and services to provide Section 3-related education and training to public housing residents.

**Family Self-sufficiency Program (FSS)** - Is a PHA resident initiative which includes working with various departments and resident councils to identify new partnership opportunities and/or collaborations to encourage resident economic development and self-sufficiency.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be**

## **provided or other assistance**

Not applicable.

In 2023 (the last year for which the PHA has received a score), the PHA earned HUD's High Performer rating for the 32nd consecutive year under HUD's Public Housing Assessment System (PHAS). SPPHA has also maintained HUD High Performer status under HUD's Section 8 Management Assessment Program (SEMAP) for 23 years.

## **Discussion**

The PHA has achieved High Performer status continuously for both its public housing and Section 8 Housing Choice Voucher Program.

The PHA has a continual need for stable Federal funding to maintain its high standards. As explained above, the PHA received approval from HUD to convert most of its public housing properties to Project-Based Rental Assistance (PBRA) under the RAD Program, effective January 1, 2020. The PHA's near-portfolio-wide RAD conversion was debt-free. In RAD, units move to PBRA (a Section 8 platform) with a long-term contract that, by law, must be renewed. This ensures that the units remain permanently affordable to low-income households. Residents continue to pay 30 percent of their income towards the rent and retain the same basic rights as living in PHA-owned housing. This program simply shifts units from the Public Housing program to the PBRA program. The PHA's RAD conversion is not "privatization" of public housing, since the same public agency will continue to own, manage, maintain and improve the properties.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

Those most at risk of homelessness are youth, older adults, and veterans. The region sees large and persistent racial disparities, with African Americans 8.7 times, Native Americans 14.5 times, and Latinx 2 times as likely to experience homelessness than white residents. The City also sees a high rate of new immigrants in the unsheltered population. The primary causes of homelessness are lack of affordable housing and living wage jobs with low barriers to entry, chronic health and mental health issues, and the ripple effects caused by discrimination in housing and other systemic factors that add barriers for many residents. In the 2023 Point in Time (PIT) count, the largest population increases included homeless families and homeless Asian families in particular.

The City continues work with weekly with the homeless outreach teams including Breaking Free and People, Inc. The City and County partner with Metro Transit's Homeless Action Team which provides street outreach, support, and resources to help homeless residents access emergency shelter at Safe Space and other permanent housing options.

Catholic Charities Higher Ground provides supportive housing units and an Opportunity Center with wrap around services. Weekly street outreach activities include locations such as the George Latimer and Rondo libraries, and the Opportunity Center. The St. Paul Residence continues to provide permanent supportive housing for low-income, long-term homeless adults, using the Housing First model. Saint Paul also has residents that are not homeless but have special needs that require supportive services to allow them to remain in their current housing situations or find supportive housing. The City will continue to provide funding for supportive services that assist those with special needs. Saint Paul's CDBG funds are allocated to the Block Nurse Program which utilizes volunteer and professional staff to help the elderly remain safely in their homes with an enhanced quality of life. Additionally, the City finances multi-family affordable housing developments that must comply with ADA requirements. The City is partnering with the County, housing providers, and private/non-profit developers to plan for the expansion of supportive housing supply and services.

A variety of housing options ranging from independent living and housing with supportive services are available for residents with special needs. Services for the elderly, frail elderly, and persons with disabilities include independent living programs, the City's Home Rehab Programs, Minnesota Homeownership Center's (MNHOC) Mortgage Counseling, ADA-designed housing, congregate living and assisted living facilities, nursing facilities, State of Minnesota, ARC Minnesota, HUD Section 811 Program for persons with disabilities, and the Block Nurse Program. Services for public housing residents with special needs include SPPHA's Assisted Living Programs (Wilder ALP and CHSP), PHA/Accessible Space New Beginnings - Brain Injury Program. And for residents with HIV/AIDS and their families, PHA/Accessible Space, Inc. provides housing and services. The City of Minneapolis manages HOPWA for Saint Paul, and the Minnesota AIDS Project helps families obtain/maintain housing.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their**

## **individual needs**

The CoC and Ramsey County are actively exploring strategies to reduce the number of persons becoming homeless in the community by focusing on strategic homeless prevention efforts and the Coordinated Entry System (CES). The CES is designed to assess and connect people to available housing options.

In 2022, the CoC developed a new Prevention and Tenant Stability workgroup. The workgroup has undergone a multi-month gaps analysis process and has the following recommendations:

1. Work closely with the county's Emergency Assistance department and other prevention resources such as the Minnesota Housing Prevention and Assistance (FHPAP) programming to break down silos and make rental assistance more expeditious.
2. Bring on more landlords; and
3. Develop centralized websites and dashboards- streamlining all prevention resources

CoC's Coordinated Entry Sub-committee is implementing recommendations from the Ramsey County 2020 CES Evaluation to improve outcomes which include:

- 1) conduct a CES policy review to identify existing policies that people with lived experience of homelessness, providers, and the CES Priority List Manager identify as creating barriers to access the CES and housing referral;
- 2) remove people from the priority list who have not been in contact with providers/CES priority list staff, or who show up in the City/Ramsey County HMIS for several years;
- 3) increase the number of people being assessed;
- 4) with post-assessment, provide more connections to mainstream services (housing financial assistance, employment, landlord mediation);
- 5) increase new landlord engagement/collaborations with the goal to create and increase housing options and reduces the wait time for housing.

CoC and the City continue to actively engage people with lived experience of homelessness, homeless service providers, domestic violence service providers, and other community partners that serve the homeless population through regular meetings. These meetings provide a better understanding of the needs of both sheltered and unsheltered persons experiencing a housing crisis.

All ESG and HUD funded program staff are trained in conducting CES assessments and the HMIS intake process. At the program-level, for both ESG and other HUD funded programs, there is a

requirement for specific documentation (per project and funding type) that must be included in a client's file: initial intake, eligibility forms, income verification, housing barriers matrix, housing stabilization plan, exit forms, etc. It is through this process that people experiencing homelessness and their providers can determine the best path to resources (health care, financial services, employment, support services, housing, etc.) to resolve the housing crisis and establish the necessary services to promote self-sufficiency and housing stability.

For example, a system gap identified in the 2020 and 2021 HHR Needs Assessment was the need for an outreach program specifically for families. Through City ESG funding, Ramsey County contracted with a provider to operate an outreach program specifically for this activity. The service needs for families are far different than other subpopulations of homeless and a dedicated family-specific outreach program was the best approach to meet the needs of marginalized families within the community.

### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City has a Joint Powers Agreement with the County to allocate its ESG funds to partially fund emergency shelters, transitional housing services, street outreach to residents experiencing homelessness, homelessness prevention, and rapid re-housing programs that support the needs of homeless or those at risk of becoming homeless.

Youth - Salvation Army Booth Brown House: ESG funding helps support the operations of a youth emergency shelter. Programs serve homeless youth aged 18-21 and permanent supportive housing is provided for youth aged 16-21. A comprehensive array of support services and case management supporting basic needs, life-skills classes, access to mainstream benefits, and ongoing services to support education, job training, and housing stability are provided.

Single Adults - Catholic Charities Higher Ground: ESG funding helps support the daily operations emergency shelters which target single adults. Basic needs and advocacy services are provided. The shelters are located close to Catholic Charities' St. Paul Opportunity Center, which provides residents with easy access to daily meals, County resources, on-sight health care, veterans services, and access to public transportation. ESG funding also supports the low-barrier shelter for single men and women known as Model Cities' Safe Space.

Families - Catholic Charities Family Service Center and Interfaith Project Home: ESG funding supports daily shelter operations and essential services. Program services include shelter space, shower, laundry, meals, on-site medical and dental services, transportation assistance, housing navigation, transportation assistance, connections to benefits and advocacy. Children's services

include mentoring, tutoring, and early childhood education. Note the Family Service Center is located in Maplewood but serves the full CoC area, benefiting the population experiencing homelessness in the CoC, primarily in the City of Saint Paul.

Transitional Housing: ESG funded programs such as street outreach and emergency shelter provide CES assessments to determine the best housing option to meet the needs of the client. In some cases, clients need a Housing First model with time-limited supports to move on to self-sufficiency which is met through a transitional housing program.

Since 2023, the CoC prioritized the concept of a Single Point of Entry (SPE) into emergency shelter. This is a key, trauma-informed practice that eases a homeless person's experience with securing a shelter bed. In short, customer service representatives will be available days, evenings, and weekends to hold shelter beds. The SPE replaces the current fragmented practice that currently makes clients participate in a nightly lottery or wait until 10 pm to find out if they have a bed.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The City's ESG and County CoC programs work together to fund community services, including homelessness prevention programs. The vision is to align local, state, and federal funding streams through the CoC with Ramsey County as the lead agency. Additionally, the City's CDBG funds have been allocated to the Block Nurse Program which utilizes volunteer and professional staff to help seniors remain safely in their homes with an enhanced quality of life.

Providers within the CoC, community service partners such as the Minnesota Assistance Council for Veterans, public service partners such as Ramsey County, Metro Transit Homeless Action Team, and SPPS work collaboratively to serve the needs of chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth.

Within the ESG-funded street outreach, emergency shelter, and homeless prevention programs, assessors are trained to facilitate a client's transition from homelessness to permanent housing. Permanent housing options may include rapid re-housing (RRH), permanent supportive housing (PSH), other permanent housing, and private/market rental housing. The City's St. Paul Residence provides permanent supportive housing for those with

late-stage chronic alcoholism and for long term homeless residents using the Housing First Model.

From recent 2024 data, there were 2,255 Ramsey County households on the CES Waitlist. These are clients that have been assessed and are waiting for a housing referral based on the needs identified during assessment. There were also 223 individuals and heads of families on the CES referral list. This reflects the clients with pending housing referrals, acknowledgement of referrals received by housing providers, and outcomes of each referral.

Considering the gap in the number of housing options available versus the need (i.e., people waiting), assessors are trained to determine the severity of the clients' level of need, which may prioritize them for housing. Additionally, during the engagement and assessment process, information is gathered to determine a client's unique immediate and ongoing service needs, identify assets and barriers to housing, and develop a plan to reduce the amount of time that a client is homeless. Ultimately, the desired outcome is to assist the client with ongoing support services to further housing stability and reduce the likelihood of returning to homelessness.

Saint Paul uses CDBG funds, HOME Funds, and Low-Income Housing Tax Credits, as appropriate, to construct or preserve affordable housing, including developing or preserving supportive housing for long-term homeless residents.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs**

Ramsey County provides programs and counseling to previously-institutionalized or homeless individuals through partnerships with nonprofit service providers to aid in the transition to permanent housing. This network provides emergency assistance, cash and food assistance, health insurance, security deposits, childcare, job training, transportation, medical/dental care, mental health counseling, chemical dependency treatment, life skills training, and job search assistance. City and CoC coordinate with service providers and County Corrections staff to provide assessments and referrals to the CES to prioritize people for services (i.e., emergency

assistance, prevention, employment services, and housing).

The City's Emergency Rental assistance will provide up to a month rent assistance or \$2,500 to households with verifiable emergency needs due to a pending eviction when other services or funds are unavailable.

Minnesota Community Care (MCC) – HouseCalls Program: The goal of HouseCalls is to prevent homelessness by stabilizing housing for those at imminent risk. Over the last 29 years, HouseCalls has refined its utility, rent and sanitation assistance program into a successful, long-term homeless prevention model. This model relies on the following strategies: early intervention and referral, coordination and advocacy, prevention, and stability. This is a collaboration between St. Paul and Ramsey County.

Public Health Department and MCC, HouseCalls combines the breadth of a public agency with the flexibility of a nonprofit to meet the needs of people at-risk of homelessness. Ramsey County Family Homeless Prevention and Assistance (FHPAP) program also funds 12 other eviction prevention programs throughout the city and metro; the largest program includes eviction prevention within Housing Court that is a partnership between Ramsey County, Neighborhood House, and Legal Aid.

Face to Face – Homeless Prevention: The target population is unaccompanied youth aged 18-24 who are at-risk of homelessness. Overall program demographics are youth of color, 15% have a long-term disability, nearly a third have children, and many have been in foster care or have experienced domestic violence. The program provides both short-term and medium-term rental assistance based on individual need. On-going case management is provided to support employment, navigate insurance, WIC, achieve personal goals, and help youth find and retain permanent housing. Prevention assistance advances outcomes - reducing both the number of overall homeless youth and the number who may become homeless for the first time.

Individuals and families at risk-of homelessness due to extremely low-income, discharged from institutions or age out of foster care, and/or currently receiving other public, non-profit or private sector services may be directed to prevention services by contacting United Way 211, calling providers directly, or accessing HHR's website for resource and intake information.

New in 2023, the Single Point of Entry (SPE) project also includes the development of two diversion case managers, so any individual new to shelter access will be engaged with diversion

tactics designed to prevent or mitigate entry into shelter or long-term shelter stays.

## **Discussion**

The City will continue its collaboration with Ramsey County CoC and social service organizations to coordinate resources across the CoC area. This collaboration is essential to addressing the needs of homeless and those at risk of being homeless as well as providing housing and supportive services for non-homeless special needs persons. Coordinating in funding across the CoC area is beneficial to Saint Paul residents and meets the priority needs identified in this plan for homeless prevention, rapid rehousing and emergency shelters and transitional housing. The CoC completes a federally required annual Point-in-Time (PIT) Count. The PIT, done by staff and volunteers, is a count of sheltered and unsheltered people experiencing homelessness on a single night in January. The purpose is to get a snapshot of the state of homelessness by counting every person experiencing homelessness. The most recent PIT count was in January 2023. Other means used to determine the number of homeless and identify the areas of greatest need are Wilder Research, HHR 7 Community Measures, and CES dashboards.

Every 3 years, Wilder Research, part of the Amherst H. Wilder Foundation, conducts a one-night statewide survey of homeless persons in Minnesota to better understand the extent, causes, circumstances, and effects of homelessness. The data are very helpful due to the comprehensive survey of people experiencing homelessness, which helps to identify client-level needs, system strategies that are working, and service gaps.

The CoC dashboards further enhance planning and prioritization by using HMIS data. HMIS data gives a more complete picture of the homeless population and is updated quarterly.

These data sources provide Ramsey County, CoC, and the City with the most comprehensive data and analysis on the reasons City and County residents are homeless and help identify barriers to finding and maintaining safe and stable housing. The data, analysis, and reporting help improve understanding about the extent, causes, circumstances and effects of homelessness in Ramsey County and Saint Paul, which then guides actions (i.e., funding priorities) to eliminate homelessness through CoC and City ESG resources.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

Housing policy must be thought of in the context of economic development (building household income/net worth), transportation (connecting people to jobs) and land use (locating parks, jobs, education and essential services near housing). City Council passed resolution 18-1204 to create and preserve housing affordable at all income levels; address racial, social and economic disparities in housing; create infrastructure needed to stabilize housing; fund an Affordable Housing Trust Fund (HTF); and continue to fund down payment assistance for first-time homebuyers. The resolution is a public acknowledgement that housing, especially affordable housing, is a City priority.

The most significant barriers for households securing affordable housing units are insufficient income and the lack of affordable housing units. The greatest gap in affordable housing units is for household with income below 30% AMI. Not only is the supply of units few, but many of the units are occupied by households that could afford a unit at a higher rent. Barriers for developing affordable housing include high costs and lack of funding and available land in a built-up city. While some of the barriers to producing affordable housing are beyond the control of local government, local policies like regulatory codes, fees, and zoning regulations may hinder the development of or increase the cost of housing.

From a financing perspective, affordable housing development requires multiple funding sources including the City local funds, TIF LIHTC, State dollars, federal funding from HUD (CDBG, HOME), and redevelopment property acquired and assembled by public entities. To keep pace with increasing demand for affordable housing and to balance development to ensure locational choice, continued federal and state funding is needed. The lack of sufficient funding and insufficient allocation of LIHTCs has negative bearing on the City's ability to provide and invest in affordable housing. The City receives only about 36% of the CDBG funding it received in 1975. Similarly, the City receives about 75% of the HOME funding it received in 2000. The City's LIHTC allocation also continues to shrink.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

There are about 18,000 publicly assisted affordable housing units within Saint Paul; roughly 9,400 are subsidized through the PHA. The City finances preservation, rehabilitation and construction of affordable housing citywide using city-owned and discounted County-owned land and local, state, and federal funds and financing tools - LIHTCs, Federal and State Historic Preservation Tax Credits, and issuing Housing Revenue bonds.

City Council Resolution 18-1204 outlined a broad range of actions to support greater housing supply and stability, including efforts to create and preserve housing affordable at all income levels; address racial, social and economic inequalities in housing; create infrastructure to stabilize housing; fund an Affordable Housing Trust Fund; and continue to fund down payment assistance for first-time

homebuyers. The Resolution also called for housing funded through the HRA to accept Section 8 vouchers; added points to the LIHTC scorecard for senior housing; and increased use of Tenant Remedies Actions.

Over the last five years, Saint Paul has amended its zoning code to support housing development and reduce barriers to affordable housing. In 2021, the City eliminated zoning requirements requiring a minimum number of off-street parking, which can increase the cost of development. City Council passed Ordinance 23-43 which eliminated single-family-only zoning districts and updated zoning regulations to reduce barriers to allow increased housing density and diversify housing options. It also incentivized providing rental units affordable at 60% of AMI, ownership units at 80% of AMI, units with three or more bedrooms, and preserving existing residential structures. The City will continue to remove barriers to housing development through updates to the zoning code and develop resources, including a “new development toolkit” and pre-approved to help facilitate the building process.

In November 2021, Saint Paul voters approved a rent stabilization ordinance to limit rent increases within a 12-month period to 3%. In a city where more than 50% of the residents are renters, the purpose of the ordinance is to keep or create new affordable rental housing particularly for lower income households and those on a fixed income. This ordinance continues to be monitored and calibrated to adapt to market conditions.

The City has established sustainable building regulations to increase the environmental and financial sustainability of development. Upfront investments in energy efficiency increases costs of new construction/major renovation but results in structures that are more sustainable and energy efficient which cost less to operate and maintain over time, which directly benefits LMI tenants.

In the past two years, CDBG funding was provided for community land trust housing to extend homeownership opportunities to lower income residents, and City and State allocated funds for deferred down-payment assistance loans designed to make homeownership possible for lower income residents by reducing private mortgage requirements. City preserves Naturally Occurring Affordable Housing through the 4(d) program which gives rental property owners an approximate annual property tax rate reduction of 80% and grant assistance for rehabilitation for units that remain affordable at 50% or 60% AMI for the next 10 years. The City also supports Naturally Occurring Affordable Housing through a Rental Rehab program.

Affordable housing is an important element of redevelopment with City investment in infrastructure. At the former Twin Cities Ford assembly plant, the Highland Bridge redevelopment is required to include 760 income-restricted affordable housing units, or 20% of the proposed 3,800 total units. 380 affordable to households earning 30% AMI, 190 affordable at 50% AMI and 190 affordable at 60% AMI. The redevelopment of the former Hillcrest golf course, The Heights, includes the production of 91 units (or more than 10% of the total units) to be affordable to households with income at 30% AMI or below, while 93 units (10.3% of the total number of units) will be restricted to households with income at 50% AMI, and 343 units (38.2% of the total number of units) will be restricted to households.

**Discussion:**

The City of Saint Paul has strong working relationships with the federal, state and county governments to develop affordable housing in Saint Paul. The City has also adopted Affordable Housing Policies that support the development and preservation of affordable housing units citywide. That said, the City lacks the financial capacity alone to meet the affordable housing needs of all its residents. As a result, federal, state, county, and local budgetary restrictions are a significant barrier to developing enough affordable housing in Saint Paul.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

This section identifies additional actions required as part of the Annual Action Plan.

### **Actions planned to address obstacles to meeting underserved needs**

In 2024, the City will address many of its underserved needs through activities of ongoing, multi-year HUD funded housing programs, primarily new construction or preservation of large family units, and units for very low- and extremely low-income households. City and its partners using CDBG and HOME program funding, LIHTCs, TIF, local funds, and the City's Housing Trust Fund through various homeowner, homebuyer, multi-unit, and new housing development programs will meet the need. The City's ESG grant is administered in coordination with Ramsey County Housing Stability Department, whose staff plays a pivotal role in Heading Home Ramsey (HHR), CoC, leadership, data, and evaluation support staff, and nongovernmental homeless services providers.

The City Homeless Assistance Response Team (HART) is a service-based street outreach approach to strategically address the needs of those experiencing homelessness. In coordination with Ramsey County and service providers, HART aligns City and County resources to ensure that every individual can be connected to services. The program includes a new response strategy to receiving calls and managing encampments and increased coordination among service agencies to provide assessments, support, and resources. The City, County, and partner organizations continue to look for better ways to work collaboratively and efficiently and align strategies to comprehensively approach outreach and service gaps.

The City, in partnership with Ramsey County, and partner organizations developed the Familiar Faces pilot project. Intended to more effectively assist individuals with most frequent interaction with emergency services such as police, EMS and fire. The Familiar Faces program integrate mental health and county case management services into the existing outreach programs- offering crisis support and shelter and a wrap-around service planning model.

Saint Paul voters approved a Residential Rent Stabilization ordinance in 2021 which took effect in May 2022 and modifications in effect January 2023. The rent-control ordinance limits rent increases within a 12-month period to 3% of the existing monthly rent, with a few exceptions, including for housing that is affordable. With more than 50% of residents as renters, the purpose of the ordinance is to retain or create new affordable rental housing particularly for lower income households and those on a fixed income. This ordinance is being evaluated.

### **Actions planned to foster and maintain affordable housing**

In 2025, the City will continue to use the majority of its CDBG funding and all its HOME funding for affordable housing activities. Projects and programs that provide assistance for homebuyers, homeowner rehabilitation, rental rehabilitation, and new construction of affordable housing will be carried out by the City, its sub-grantees, non-profit and for-profit partners. Descriptions of the specific

projects and programs can be found in the AP-38 Project Summary section of this document. In addition to the HUD-funded activities, the City will carry out housing development in conjunction with Minnesota Housing Finance Agency (MHFA), Metropolitan Council, Family Housing Fund, the Minnesota Department of Employment and Economic Development (DEED), the Minnesota Management and Budget Office (MMB), Saint Paul HRA, as well as private partners. The City will use the 60 percent tax credit rent for determining affordable rents for rental housing that is assisted with CDBG funding. HOME assisted developments will use the established HOME rents.

The 2040 Comprehensive Plan supports affordable housing development. Affordable housing priorities are preservation and production of rental housing affordable for those at or below 30% of AMI; create homeownership opportunities for households with low- and moderate-incomes; housing preservation for low-income elderly homeowners between 0-50% of AMI; and provide housing for special needs populations. Policy H-32 states “Continue to use City/HRA resources to support affordable rental housing citywide with at least 30 percent of the total rental units (both market-rate and affordable) financially assisted by the City/HRA being affordable to households earning 60 percent or less of AMI with at least: 10% of all units being affordable to households earning 30% of AMI; 10% of all units being affordable to households earning 50% of AMI; and 10% of all units being affordable to households earning 60% of AMI.”

Saint Paul voters approved a Residential Rent Stabilization ordinance in 2021 which took effect in May 2022 and modifications in effect January 2023. The rent-control ordinance limits rent increases within a 12-month period to 3% of the existing monthly rent, with a few exceptions, including for housing that is affordable. With more than 50% of residents as renters, the purpose of the ordinance is to retain or create new affordable rental housing particularly for lower income households and those on a fixed income. This ordinance is being evaluated.

The City’s Low-Income Housing Tax Credit (LIHTC) selection process also encourage a more equitable distribution of affordable housing citywide. The City’s HTF funding will be combined with existing City and federal resources for investment in creating housing affordability, preserving existing affordable units for both renters and homeowners, pursuing innovative housing stability strategies and establishing protections for renters and owners vulnerable to housing instability. City HRA mended its scoring structure for LIHTC applicants to provide added points to projects that provide housing targeted to residents earning no more than 30% AMI.

Emergency Rental Assistance – the program will provide up to a month rent assistance or \$2,500 to households with verifiable emergency needs due to a pending eviction when other services or funds are unavailable.

Community Land Trust Pilot – Saint Paul has dedicated HTF funds to community land trusts to provide new pathways to homeownership for low- and moderate-income households and to promote long-term

affordable community ownership.

Downpayment Assistance and Homeowner Rehabilitation Programs – With Housing Trust Fund and CDBG funds, respectively the City provides low- and moderate-income homebuyers and homeowners with opportunities to build and retain wealth through homeownership.

### **Actions planned to reduce lead-based paint hazards**

The City continues to comply with HUD regulations concerning lead-based paint (LBP), including notifying applicants of the lead requirements, performing lead screening, requiring abatement by certified workers, and completing clearance testing on HUD-funded housing projects. The City will also continue to work with Ramsey County through referrals to its Lead Window Replacement Program for homes and rental units with young children (most at risk of lead poisoning), identified lead paint issues, and whose gross household income is at or below 80% AMI. The program is available to both owner-occupied housing and rental property owners.

### **Actions planned to reduce the number of poverty-level families**

Critical to reducing poverty is workforce development and skills training and access to economic opportunity. The City's strong partnership with Ramsey County combines Workforce Innovation and Opportunity Act (WIOA) funds with state and local funds through a Joint Powers Agreement. Most of the workforce development investments are managed by Ramsey County Workforce Solutions and overseen by a City-County Workforce Innovation Board (WIB). The City invests directly in youth internships, scholarships for technology certification programs, workforce counseling and programs that support businesses and create jobs for low/moderate-income persons.

Department of Human Rights and Equal Economic Opportunity (HREEO) - deals with discrimination issues and provides access to economic opportunities through inclusive contracting practices and workforce development policies. The City of Saint Paul's Section 3 Program gives metro area low-income and public housing residents and businesses a connection to jobs, training and contracting opportunities. The City of Saint Paul is also the lead agency for the Twin Cities Section 3 Collaborative, which comprises of the cities of Saint Paul and Minneapolis, Minneapolis Public Housing Authority, Ramsey, Hennepin and Anoka Counties and Community Development Agencies of Washington and Dakota Counties.

Full Stack – a public-private collaboration with a renewed focus on using the power of tech and

innovation to leverage equitable, sustainable, resilient economic development in Saint Paul.

Minimum Wage Ordinance – sets the lowest hourly pay rate for work done in Saint Paul. The minimum wage varies based on a business's size and increases in phases. The City will require businesses of all sizes to pay their employees a minimum wage of \$15 an hour by 2027.

Office of Financial Empowerment - Saint Paul established the Office of Financial Empowerment (OFE) in 2019 because economic inequality is a whole-city crisis that demands a whole-city response. OFE is working deliberately to help a new generation of Saint Paul residents repair those generational injustices and build equitable economic power for decades to come.

- OFE welcomes every new baby to our city with \$50 in a college savings account — a small but powerful investment in each child’s boundless potential — through the CollegeBound Saint Paul program. CollegeBound also provides opportunities for families to grow the account and earn bonus deposits through engaging in the program or completing activities related to the development of their child or their family’s financial stability.
- OFE leads the City’s strategy around guaranteed income which provides monthly unrestricted cash to eligible families with children with CollegeBound accounts. The People’s Prosperity Pilot provided 150 families with \$500 a month for 18 months, and research results showed positive trends in employment, physical and mental health, and other indicators of well-being and quality of life. The current program CollegeBound Boost provides 333 families with \$500 for 24 months.
- OFE oversees the Medical Debt Reset Initiative, which is a partnership with national nonprofit Undue Medical Debt to acquire and cancel an estimated \$110 million in medical debt for Saint Paul residents. Medical debt poses a large financial burden for many individuals and families, and by easing this burden, the City helps residents build health and wealth in their communities.
- OFE manages the LOCAL Fund which uses shared ownership models to build local economic wealth among Saint Paul residents and small businesses. The LOCAL Fund aims to achieve healthy and sustainable neighborhoods through recovery of vacant and abandoned properties and to mitigate the enduring economic impacts of the pandemic on small businesses.

Open for Business – a one-stop shop for start-up and existing businesses to get information and leverage resources. The program provides a pocket guide (in several languages) to starting a business in Saint Paul; connection with information and resources to start, move or expand a business; and help from a Business Project Facilitator as a guide through the permitting and licensing process of opening, expanding or moving to the City.

### **Actions planned to develop institutional structure**

Saint Paul’s institutional structure gives the City the opportunity to partner with many

organizations. In 2025, the City of Saint Paul Department of Planning and Economic Development (PED) will again work with other City departments, as well as other levels of government (county, state, federal), non-profit organizations, and private sector developers to plan and implement housing, economic development, and community development investments.

City Council passed Ordinance 23-43 which eliminated single-family-only zoning districts and updated zoning regulations to reduce barriers to allow increased housing density, diversify housing options, and incentivize providing rental units affordable at 60% of AMI, ownership units at 80% of AMI, units with three or more bedrooms, and for retaining an existing residential structure. The City will continue to remove barriers to housing development through updates to the zoning code and develop resources, including a “new development toolkit” and pre-approved to help facilitate the building process.

City Council passed Ordinance 22-3 to expand the definitions for religious institution and community center to permit the most wanted and needed uses at these sites. Also included was an expanded definition of day care/preschool to allow for activities at existing and former religious sites; emergency housing at religious institutions with no zoning limits; overnight shelter at religious institutions for up to 25 adults; and homeless services at religious institutions subject to same regulations elsewhere. These changes establish a better process for land use applications for religious organizations and community centers.

The City and regional partners in the Fair Housing Implementation Council (FHIC), developed responsive strategies to Affirmatively Further Fair Housing within the Twin Cities. The 2020 Regional Analysis of Impediments to Fair Housing Choice (2020 AI) was finalized in January 2021, by the FHIC and The Lawyers Committee for Civil Rights Under Law. FHIC members are the cities of Coon Rapids, Bloomington, Eden Prairie, Minneapolis, Minnetonka, Plymouth, and Woodbury; the Counties of Anoka, Dakota, Hennepin, Ramsey, Washington; and the Community Development Agencies of Carver and Scott Counties. The 2020 AI identifies the causes for housing disparities, factors that reduce fair housing choice, the distribution of affordable housing (publicly funded and naturally occurring), displacement that disproportionately affects protected classes, the effects of gentrification on protected classes, integration and segregation, and disparities in access to opportunity as defined by HUD.

There remains a sustained focus across Mayoral administrations to address racial inequities. OFE has developed a framework for a citywide fair housing strategy and will be revisiting that framework to build out the strategy components, including use of the AI findings. The City has developed initiatives for each department to identify goals for their workforce, programs, services, and community impact that expand and improve racial representation and cultural

understanding.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

Saint Paul will continue to coordinate services with Ramsey County (the primary public service provider), and the Saint Paul Public Housing Agency (administrator of public housing and vouchers in Saint Paul) in 2025. The City through the FHIC will work with metro-wide governmental jurisdictions to affirmatively further fair housing regionally in the Twin Cities Metro Area.

The City and County are partnering closely on strategies and investments to address housing instability across the housing continuum, to provide supports to residents experiencing homelessness, and ensure that residents receive coordinated social services. This agreement between the City and County suballocating City ESG dollars helps to achieve stronger coordination of shelter, street outreach and social services provided to Saint Paul residents by Ramsey County.

The City will continue to work with Community Development Corporations (CDCs), other nonprofit organizations, and the private sector (businesses, developers, social service agencies) to ensure maximum community benefit from housing, economic development, and community development investments.

The public/private partnership to build the new Dorothy Day Center, Higher Ground and an Opportunity Center to provide permanent supportive housing, connection with community service providers, a medical respite program, and coordination among institutional private health care providers and public health care providers, such as Health Care for the Homeless. City economic development programs provide gap financing, which requires businesses seeking assistance to secure other public and private financing from banks, the state, Metropolitan Council, private foundations, personal capital, CDCs, and other lenders. This coordination ensures that funds leveraged are maximized and HUD-funding utilized where most needed. As a partner in workforce development through a Joint Powers Agreement with Ramsey County that establishes a joint Workforce

Innovation Board (WIB), Saint Paul is regularly partnering with Ramsey County on training programs and wrap around social services for residents. The WIB is comprised of 50% business representatives, ensuring collaboration with employers. Through sector-based approaches, Saint Paul has entered into regional partnerships for job skills credentialing programs and provided scholarships to low-income residents using City funds.

### **Discussion:**

There are many initiatives within the City of Saint Paul in the Mayor's Office, the Department of Planning and Economic Development, and its Housing Division. Like a diversified portfolio, a diversity of housing types and development strategies can increase local resiliency through changing economic times.

The City has established a local Housing Trust Fund; a minimum wage of \$15 per hour; broadened zoning flexibility to allow a greater variety of housing types; eliminated parking minimums from zoning restrictions; and formed the Office of Financial Empowerment. The City continues to hold regular procurement fairs to recruit Section 3 and W/M/SBE/ESBE businesses, requires use of Section 3 vendors for all construction/rehabilitation housing projects or other public construction projects. In November 2021, Saint Paul voters approved a rent stabilization ordinance to limit rent increases within a 12-month period to 3%. In a city where more than 50% of the residents are renters, the purpose of the ordinance is to keep or create new affordable rental housing particularly for lower income households and those on a fixed income. This ordinance continues to be evaluated.

Affirmatively Furthering Fair Housing - With its Consolidated Plan and Annual Action Plan submittals, Saint Paul is required to certify to HUD that it will affirmatively further fair housing, which includes completing an Analysis of Impediments (AI) to Fair Housing Choice. The City and regional partners in the Fair Housing Implementation Council (FHIC), developed responsive strategies to Affirmatively Further Fair Housing within the Twin Cities. The 2020 Regional Analysis of Impediments to Fair Housing Choice (2020 AI) was finalized in January 2021, by the FHIC and The Lawyers Committee for Civil Rights Under Law. FHIC members are the cities of Coon Rapids, Bloomington, Eden Prairie, Minneapolis, Minnetonka, Plymouth, and Woodbury; the Counties of Anoka, Dakota, Hennepin, Ramsey, Washington; and the Community Development Agencies of Carver and Scott Counties. The 2020 AI identifies the causes for housing disparities, factors that reduce fair housing choice, the distribution of affordable housing (publicly funded and naturally occurring), displacement that disproportionately affects protected classes, the effects of gentrification on protected classes, integration and segregation, and disparities in access to opportunity as defined by HUD.

## **Program Specific Requirements**

### **AP-90 Program Specific Requirements – 91.220(I)(1,2,4)**

#### **Introduction:**

The City received funding allocations of \$6,765,326 for CDBG, \$1,534,711 in HOME funding and \$591,281 in ESG funding from HUD in 2024 and expects to receive similar amounts in 2025, but exact amounts are unknown at time of draft publication. In addition, the City estimates using about \$235,000 in CDBG program income and approximately \$206,225 in HOME program income. Program income is income directly generated from a CDBG or HOME program funded activity, such as loan repayments. Because the federal budget allocations for 2025 were not yet passed upon drafting this Action Plan, the City has a contingency plan for different funding amounts. Should the City receive an amount higher or lower than the estimates from last program year, all activities will be adjusted in direct proportion to the difference in actual allocations and Program Income may be re-evaluated.

A consecutive period of three years, 2023, 2024 and 2025, is being used to determine that the minimum overall benefit of 70 percent of CDBG funds is used to benefit persons of low- and moderate-income. The City of Saint Paul will allow, but not require, owners of HOME-funded housing developments to limit the beneficiaries or give preferences to a segment of the low-income population. This includes limiting units or giving preferences to the following low-income population segments: elderly and/or disabled, victims of domestic violence, and chronically homeless.

#### **Community Development Block Grant Program (CDBG)**

##### **Reference 24 CFR 91.220(I)(1)**

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	234,674
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.	0
5. The amount of income from float-funded activities	0
<b>Total Program Income</b>	<b>234,674</b>

**Other CDBG Requirements**

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	0

**HOME Investment Partnership Program (HOME)**

**Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City does not plan any additional forms of investment beyond eligible uses of HOME funds identified in 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The City of Saint Paul does not have a HOME Program Resale/Recapture Policy.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds. See 24 CFR 92.254(a)(4) are as follows:

The City of Saint Paul does not have a HOME Program Resale/Recapture Policy.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is

rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

The City does not anticipate refinancing existing debt secured by multifamily housing that is rehabilitated with HOME funds.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Not applicable.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

Not applicable.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Preferences may be utilized to support elderly and/or disabled, victims of domestic violence, and chronically homeless.

### **Emergency Solutions Grant (ESG) Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

The ESG Program Manual was developed in partnership with Ramsey County to provide written standards for the program, see Attachment E.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Coordinated Entry is the process to access supportive housing for individuals and families experiencing homelessness. Supportive housing resources are extremely limited. Because of this, individuals and families with the highest vulnerability, most significant service needs, and longest history of homelessness are prioritized. Housing is not guaranteed through this process. To be eligible for a housing assessment in Ramsey County and within the City of Saint Paul, households must meet one of the following homeless definitions: a) HUD Homeless - staying in shelter, outside, or in other places not meant for human habitation; exiting an institution where person/household resided for 90 days or less and who resided in shelter or other place not meant for human habitation prior to entering the institution; and/or fleeing or attempting to flee domestic violence;

b) Long Term Homeless (LTH) - lacking a permanent place to live continuously for a year or more or at least four times in the past three years. Time spent in institutional care or correctional facility (if longer than 90 days) shall be considered "excluded time" and does not count toward length of time a household has been homeless. Episodes of homelessness can include time doubled-up or couch-hopping. Doubled-up or couch-hopping is considered homeless if that arrangement has persisted less than 12 months; c) For Youth (ages 24 and younger) ONLY: Minnesota Homeless - any unaccompanied youth or youth aged heads of households that is without a permanent place to live that is fit for human habitation.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private non-profit organizations (including community and faith-based organizations).

The City currently has a Joint Powers Agreement with Ramsey County to allocate its ESG funds to programs in alignment with other local, state, and federal funding sources through the Ramsey County CoC. For City ESG funding, the CoC Coordinator releases a letter of interest (LOI) to the general public and through the CoC listserv. The CoC funded Planner and Evaluation Analyst creates a scoring matrix and scoring evaluation. The CoC Ranking Committee then reads all applications and scores based on how applicants respond to the LOI. The CoC Ranking Committee meets to review applications, score and rank the projects for funding and makes the final decision on which projects to fund. The CoC Governing Board reviews the selected candidates and Ramsey County Housing Stability Department then enters into contracts with the agencies.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The County and CoC through ongoing meetings, monitoring, data collection, evaluations, recruitment of persons with lived experience of homelessness and in consultation with services providers, collects information to address policy and funding decisions for improvements to ESG funded activities, facilities and services. The CoC Ranking Committee includes two active individuals who have experienced homelessness.

5. Describe performance standards for evaluating ESG.

The performance standards for evaluating ESG funded programs includes but are not limited to the ranking and scoring process; assessing how funding is spent, drawdowns; ESG compliance through monitoring visits; and any required follow-up meetings with providers if there are critical findings discovered in monitoring visits. Monitoring guides and checklists are incorporated into the County's ESG Program manual (see Attachment E) and utilize the same elements of the HUD CPD Monitoring handbook.

## Appendix - Alternate/Local Data Sources

1	<b>Data Source Name</b> Ramsey County CoC
	<b>List the name of the organization or individual who originated the data set.</b> Ramsey County CoC and Ramsey County Health and Wellness Administration’s Research and Evaluation
	<b>Provide a brief summary of the data set.</b> This data came from Ramsey County CoC through their 2023 Point-in-Time survey.
	<b>What was the purpose for developing this data set?</b> The point-in-time surveys and the annual HUD System Performance Measures are required by HUD. The Coordinated Access reports are required by HUD and Ramsey County CoC.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> The data is comprehensive for Ramsey County.
	<b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b> Point-in-Time survey covers January 25, 2023.
	<b>What is the status of the data set (complete, in progress, or planned)?</b> Complete.
2	<b>Data Source Name</b> Vacant Properties
	<b>List the name of the organization or individual who originated the data set.</b> City of Saint Paul Vacant Building List, Saint Paul Open Information Portal
	<b>Provide a brief summary of the data set.</b> Vacant buildings (category 0 - 3)
	<b>What was the purpose for developing this data set?</b> Maintain list of vacant buildings for code enforcement.
	<b>How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population?</b> Comprehensive, city-wide.

	<p><b>What time period (provide the year, and optionally month, or month and day) is covered by this data set?</b></p> <p>Number of vacant units as of 12/27/2024.</p>
	<p><b>What is the status of the data set (complete, in progress, or planned)?</b></p> <p>Complete</p>

ATTACHMENTS:

- A. CIB minutes from August
- B. Concentrations of Disproportionate Need
- C. CIB recommendations
- D. CDBG-Eligible Census Tracts
- E. ESG Program Manual
- F. Comments from the Public Comment Period and minutes from April 27, 2025, Public Hearing (TBD)