



Analysis of Impediments to Fair Housing Choice 2020

City of Duluth, Planning & Development Division



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Executive Summary

HUD Funding Requirements

Each year the City of Duluth receives roughly \$3 million from the Department of Housing and Urban Development (HUD) in the form of Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) funds. CDBG funds support community development projects including affordable housing, public services, public facilities, and economic development. HOME funds support programs that create affordable housing for low-income households. ESG funds support projects that offer basic needs and housing stabilization services to community members experiencing or at risk of experiencing homelessness.

To receive these funds, HUD requires the City to create a Consolidated Plan that lays out how the City of Duluth and its partners will use an expected \$15 million in HUD funds over the next five years to meet community needs. To develop this plan, we use a collaborative process to establish a unified vision for community development actions. This process allows the City and community members to shape the various housing and community development programs into effective, coordinated neighborhood and community development strategies.

HUD also requires that the City affirmatively furthers fair housing choice. In short, HUD wants the City to ensure that we don't spend these funds in ways that increase segregation and concentrations of poverty or reduce people's ability to live in the neighborhood they want to. In conjunction with each five-year Consolidated Plan, we develop an Analysis of Impediments to Fair Housing Choice (AI). The AI lays out the City's planned actions to affirmatively further fair housing for the next five years. We look at the following federally defined protected classes when we analyze fair housing issues: race, color, religion, sexual orientation, gender identity, disability, family status, and national origin. Anything that limits housing availability or choice on the basis of these protected classes is an impediment to fair housing choice.

Recent Trends

The economic recession of 2008 proved to be a turning point for the city from a predominantly resource-based economy to a more diversified job base. As the housing market has recovered from the recession, rents and home sale prices are rising, but increases in income are not keeping up resulting in higher poverty rates and more cost-burdened households. The total number of housing units in Duluth is increasing, but there are still not enough units resulting in a "seller's market" with competitive and quick home sales, low rental vacancy rates, and increasing rents. Recently and in the coming years baby boomers are retiring in record numbers, leaving positions that have been filled for decades. Employers across the state, including in Duluth, have had to be creative in attracting and retaining employees with competitive benefits packages and flexibility within the workplace.

In recent years the Lincoln Park neighborhood, one of the lowest income neighborhoods in the city, has started to see much needed reinvestment, but appears to have undergone some significant demographic changes since 2015, signifying that this neighborhood has a high displacement risk. Necessary reinvestment in neighborhoods, such as what is occurring in Lincoln Park, has the potential to displace or limit the ability to stay in place for some residents and businesses.

Impediments to Fair Housing Choice

The City reviewed demographic data, collected input from community members and organizations, and researched trends in housing and real estate in order to develop these impediments to fair housing choice.

What impediments does the City of Duluth face in 2020?

- 1) Exclusionary rental housing practices and policies directed at Section 8 Housing Choice Voucher holders
- 2) Exclusionary rental housing practices and policies directed at persons with criminal histories
- 3) Involuntary displacement and limited housing choice caused by gentrification
- 4) Policies and physical limitations in the built environment

The Planning and Development Division will incorporate priorities and objectives in the 2020 to 2024 Consolidated Plan with these identified impediments to fair housing choice. They will work with other departments and organizations to develop strategies to address the impediments. Strategies are included at the end of this report in Chapter 6, Fair Housing Plan.

Chapter 1: Introduction

The Department of Housing and Urban Development (HUD) requires an Analysis of Impediments to Fair Housing Choice to be conducted by all Community Development Block Grant recipients every 3 to 5 years. The City of Duluth's previous Analysis of Impediments to Fair Housing Choice was published in 2015. This analysis will coincide with the City of Duluth Planning and Development Division's update of the five-year Consolidated Plan. The Analysis of Impediments to Fair Housing Choice, commonly called the Analysis of Impediments (AI), will examine various data sources and attempt to determine what impediments exist to fair housing choice and what actions the City can undertake to affirmatively further fair housing choice.

What is Fair Housing?

The Federal Fair Housing Act of 1968 prohibits discrimination in the sale, rental, or financing of housing. HUD has determined that housing discrimination is:

“Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices,

OR

Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin.”

This report will examine discrimination of the above mentioned protected classes focusing on rental housing and home ownership. It will examine what if any effect city policies have on housing discrimination and examine possible policies that can help alleviate impediments to fair housing choice.

Why the City of Duluth Affirmatively Further Fair Housing Choice

First, the AI helps the City understand rental and homeownership markets and examines them to ensure the law is followed. Second, the AI provides guidance on how to help those who were victims of housing discrimination. Third, under section 808(e)(5) of the Fair Housing Act of 1968, HUD is required to “Affirmatively Further Fair Housing Choice,” therefore HUD requires cities who receive funding to complete an Analysis of Impediments to Fair Housing Choice. Besides being required by HUD there are many reasons the City of Duluth wants to further fair housing choice. Completing the analysis allows for city staff to make connections with the community and discuss housing issues that affect development and safety. It also ensures that neighborhoods remain diverse in a variety of ways.

Requirements pursuant to HUD Guidelines

The City of Duluth is required to affirmatively further fair housing under the Department of Housing and Urban Development. As directed in 24 CFR 91.225 Certifications (1) affirmatively furthering fair housing

“Each jurisdiction is required to submit a certification that it will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.”

To continue to be in compliance with requirements for the CDBG, HOME, and ESG funding, the City must create an Analysis of Impediments to Fair Housing Choice and create an Action Plan in which the City addresses Impediments. The City of Duluth Planning and Development Division under the Department of Planning and Economic Development oversees HUD funding and conducts the AI. The AI is the result of input from a variety of data sources. Demographic information from the United States Census Bureau, financial data from the Housing Mortgage Disclosure Act, input from public and non-profit agencies, personal testimonials from public input sessions, and a survey conducted by the Planning and Development Division in 2019 will guide this report. Information regarding zoning and code requirements were supplied from the City of Duluth Department of Planning and Economic Development. Rental information was pulled from the 2018 Housing Indicator Report and 2019 Rental Survey performed by the Planning and Development Division. Pulling together both public data sources and city studies allows for a robust understanding of impediments that the City of Duluth may face.

The AI will start by looking at the demographics of the City of Duluth both in totality and spatially. After an understanding of the socioeconomic make-up of Duluth the AI will pull in data to discern any patterns of potential discrimination. The AI will pull in information from datasets and from testimonials. After an analysis of the data, impediments will be determined. An action plan to address impediments will be the final component of this report.

Participants

The AI was conducted by the City of Duluth’s Planning and Development Division. Information was solicited from public entities, non-profits, other city departments, residents and property holders. City staff conducted an online survey, agency consultations, and facilitated public hearings of the Community Development Committee.

Goals for the AI

With this report the City of Duluth will have a greater understanding of Fair Housing issues that community members face. The City plans to develop and strengthen contacts with the community and agencies that work on furthering fair housing choice. It will also evaluate past action plan items and create a new realistic action plan.

Limitations

While census data and public input can help create a basis about fair housing issues, they do not provide an all-encompassing picture. Incidents of discrimination and micro-aggressions cannot necessarily be documented with data. Historical disenfranchisement and marginalization of some groups means they may be wary of engaging with an institution such as the City of Duluth to make formal reports of discrimination and fair housing violations. Often people facing

housing discrimination are in precarious situations and do not want to risk losing their housing by reporting their landlord. Using the most comprehensive data sources available and listening to our community are the best tools we have available to provide a summary of current conditions.

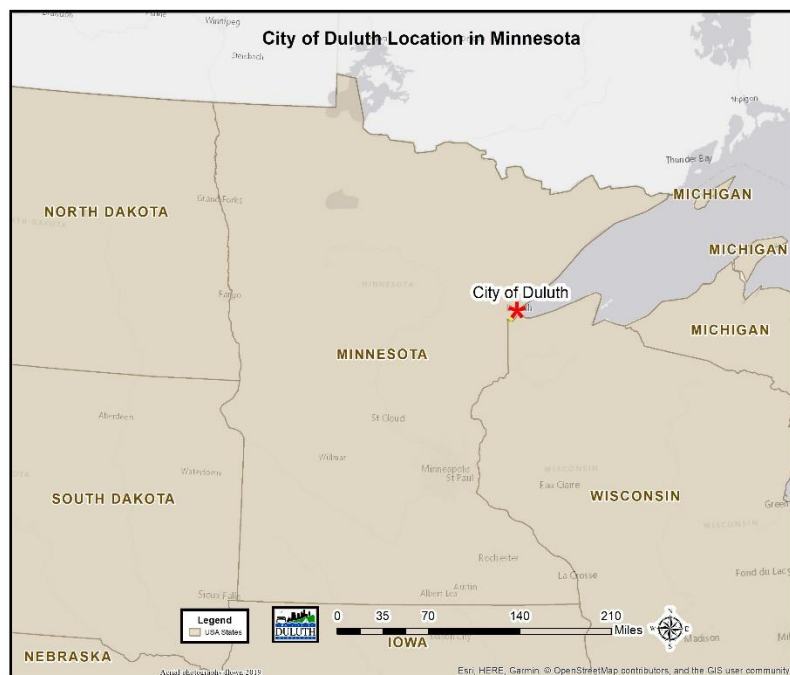
The relatively small number of people who identify as races other than white in Duluth makes it difficult to show statistically significant patterns in those populations, especially when looking at smaller neighborhood populations and when using demographic estimates, rather than Census counts. However, clear patterns of inequity do exist between white and non-white residents in Duluth, so in order to show those patterns with statistically significant data, we often combine the data from all non-white residents into one group. This is a limitation of the data we have available and we acknowledge that members of different racial groups face different current and historical legacies of racism in the United States. Throughout this report we will use the term BIPOC, which stands for Black, Indigenous, and People of Color. We use this term as a way to “highlight the unique relationship to whiteness that Indigenous and Black people” have in this country.¹

¹ <https://www.thebipocproject.org/>

Chapter 2: Duluth, MN

History

In 950 A.D. the Anishinaabeg people began to travel westward until they found the “food that grows on water” (wild rice). After centuries of migration from their homelands on the St. Lawrence Seaway, the Anishinaabeg people arrived in the eastern Great Lakes region around 1400 and continued their westward migration, eventually settling along the shores of “Gichigami” (Lake Superior). In the 1600’s, Europeans began to arrive in the Great Lakes region and started trading with local bands of Indigenous Peoples, including the Ojibwe. Throughout the 1800’s the Ojibwe negotiated several treaties with local and foreign leaders. The treaties ceded millions of acres of Ojibwe lands, but recognized the tribes as sovereign nations and the Ojibwe maintained their rights to hunt, fish, and gather on the ceded lands. In 1852 Chief Buffalo traveled to Washington D.C. and was successful in stopping the federal government’s Ojibwe removal efforts. This meeting also led to the Treaty of 1854 which ceded more Ojibwe



lands and created reservations throughout the northeastern Minnesota region.² As part of the 1854 Treaty, Chief Buffalo held the right to reserve a portion of land for his people. He chose an area to protect sacred sites, including a large Ojibwe burial ground at Rice’s Point. After Chief Buffalo died, his reservation was, through schemes and illegal dealings, sold. Today portions of downtown Duluth, including the municipal buildings and civic center, are located on Chief Buffalo’s Reservation.³

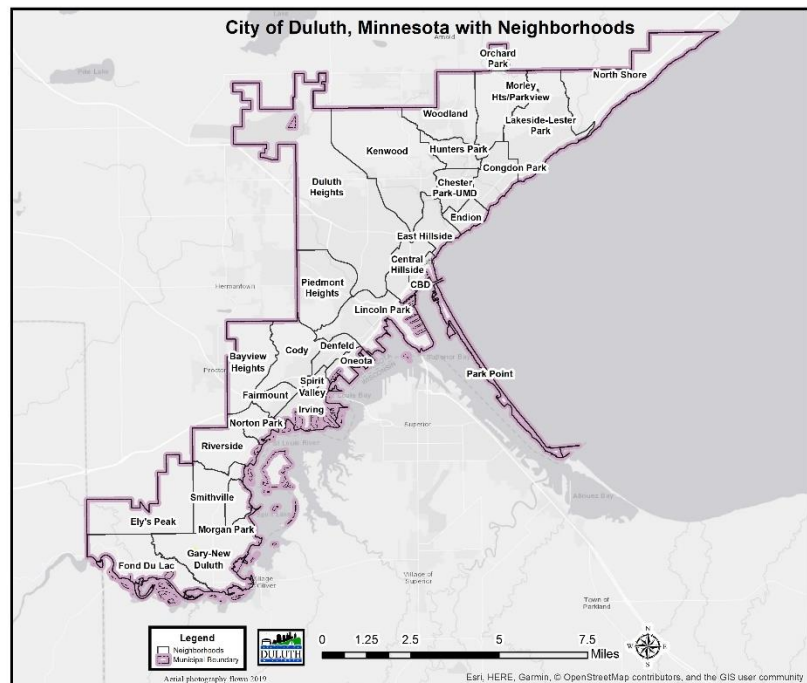
The City of Duluth, located on the north shore of Lake Superior, was founded in 1887, named after Daniel Greysolon, Sieur du Lhut, a French fur trader who set up fur trade routes in the Great Lakes region in the 1600’s. At the turn of the 20th century, Duluth was a booming industrial, port city with rail and shipping capacity as well as access to rich natural resources from the timber and mining industries. Many European immigrants were drawn to Duluth during this time to work in industrial jobs. Some companies also recruited Black southerners to work because they could pay them less than white workers. As working-class neighborhoods developed to house industrial workers, neighborhood housing inequities began to arise. Social

² “Lake Superior Ojibwe Gallery” guide by St. Louis County Heritage and Arts Center

³ “An Ethnographic Study of Indigenous Contributions to the City of Duluth” by Turnstone Historical Research, July 2015

hierarchies at the time meant that Black people could only live in certain neighborhoods. Often certain groups of European immigrants, such as Italians, and Black people were relegated to subpar and crowded housing.⁴ Duluth's population peaked in the 1950s and 60s, with over 100,000 residents calling the city home. During the following decades, the city's population gradually decreased, and for the past 25 years has hovered around 86,000 people.

Today Duluth is Minnesota's fourth largest city with a population of 86,265 at the time of the last decennial Census in 2010.



Recent Trends

Economic Development

The economic recession of 2008 proved to be a turning point for the city from a predominantly resource-based economy to a more diversified job base. While this event was felt most directly in the housing sector, there was also a short slowdown in business development. After 2010, the community saw new opportunities with the construction of schools, housing, and commercial buildings. A concentrated effort was made by the city in 2012 to develop a positive brand and publicize it both locally and across the state. This effort has resulted in new local investment and has attracted developers from the Twin Cities.⁵ The four largest industries in Duluth continue to be health care, public administration, educational services, and manufacturing. Health care and social assistance jobs employ approximately 11,400 people, making Duluth the largest medical hub in Northern Minnesota.⁶

Across Minnesota, and the U.S., baby boomers are retiring in record numbers, leaving positions that have been filled for decades. Employers across the state, including in Duluth, have had to be creative in attracting and retaining employees with competitive benefits packages and flexibility within the workplace. Companies are offering free workout classes and other health

⁴ Minnesota Historical Society

⁵ Imagine Duluth 2035

⁶ 2018 Housing Indicator Report

and wellness opportunities during the workday to create a pleasant environment and improve retention rates.⁷

Students moving to Duluth for higher education want not only an education, but employment after graduation. Enrollment numbers at Lake Superior College have seen a drastic increase in their manufacturing and skilled trades programs as a direct tie to job openings within the area, and the need for tradespeople within this labor force.⁸

Housing

In the early 2000's the housing market for residential development was robust with over 4,000 resales annually. Like the rest of the country, however, Duluth experienced the recession of 2008 and the burst of the housing bubble.⁹ Since about 2012, Duluth continues to follow state and national trends of increasing home sales prices. Trends from 2018 continue to show growth in the number of housing sales and increases in annual median income. Trends also show a widening gap for Duluth residents facing housing cost-burdens due to increasing rents. Duluth single-family home sales continue to be driven by a "sellers' market." From 2010 to 2018, the median sales price increased by approximately 26% from \$137,850 to \$173,500. The total number of valid sales increased from 2017 to 2018 by 4% to 1,202 sales; the highest total number of single-family homes sold in a single year in the last decade.¹⁰



City of Duluth

In 2018, the average market rate housing rent in Duluth was \$1,111 per month. This represents an 11% increase from 2017 and the continuation of an upward trend, as the average rental price per month has risen 63% over the past decade.¹¹ In 2017 and 2018 Duluth saw a net gain of more than 300 housing units. In the last year more than 300 new housing units have been permitted for construction in Duluth. Some of these are luxury apartment units with higher rents, but more will likely shift the market to have slightly higher vacancy rates and lower rents.

This is evidenced by the most recent rental survey which shows an average market rate rent of \$1,083 in 2019. This is the first time the average rent has gone down since 2011.¹²

Reinvestment and Gentrification Concerns

In recent years the Lincoln Park neighborhood, one of the lowest income neighborhoods in the city, has started to see much needed reinvestment. The Lincoln Park Craft District is home to shops selling handcrafted goods, restaurants that source their ingredients locally, and a plethora of craft beverage companies. The neighborhood has also seen increased community organizing

⁷ 2018 Housing Indicator Report

⁸ 2018 Housing Indicator Report

⁹ Imagine Duluth 2035

¹⁰ 2018 Housing Indicator Report

¹¹ 2018 Housing Indicator Report

¹² City of Duluth Rental Survey

in the form of movements such as Our Lincoln Park. Necessary reinvestment in neighborhoods, such as what is occurring in Lincoln Park, has the potential to displace or limit the ability to stay in place for some residents and businesses. Research regarding involuntary displacement shows that certain demographic characteristics, such as being a renter rather than a homeowner or having a lower income makes it more difficult for individuals to resist displacement.¹³ In Duluth 40% of all households rent, but households of color are disproportionately renters (71%) rather than owners (29%) and in Lincoln Park, the majority of households (54%) are renters.



John Yuccas, Eater Twin Cities



<https://www.ourlincolnpark.com/>

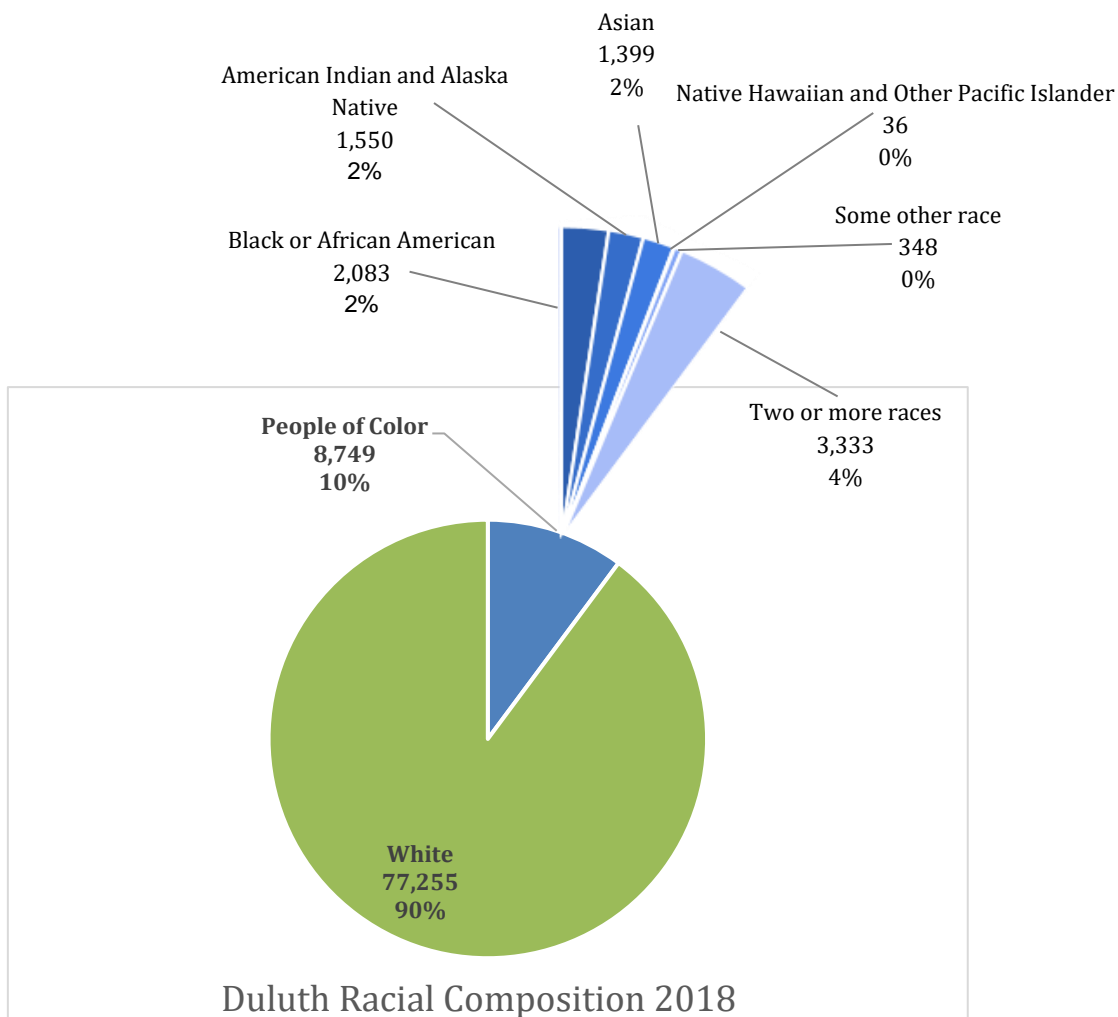
The key difference between neighborhood revitalization and gentrification is that gentrification causes involuntary displacement of residents and community-serving small businesses. Investments in neighborhoods that improve communities are a good thing, but these investments should be paired with anti-displacement strategies to ensure that everyone in the community benefits from revitalization. The Lincoln Park neighborhood appears to have undergone some significant demographic changes since 2015, signifying that this neighborhood has a high displacement risk. The neighborhood has seen an increase in the white population and a decrease in people of color. In 2015 the neighborhood population was 22% people of color, and with no change in total population, the neighborhood was only 17% people of color in 2017. From 2015 to 2017, the citywide median household income increased by about \$2,000. During the same time-period the Lincoln Park median household income increased by about \$6,000, further indicating a demographic shift in the Lincoln Park neighborhood following ongoing reinvestment.

¹³ Lisa Bates Gentrification and Displacement Study: <https://www.portlandoregon.gov/bps/article/454027>

Chapter 3: Demographics

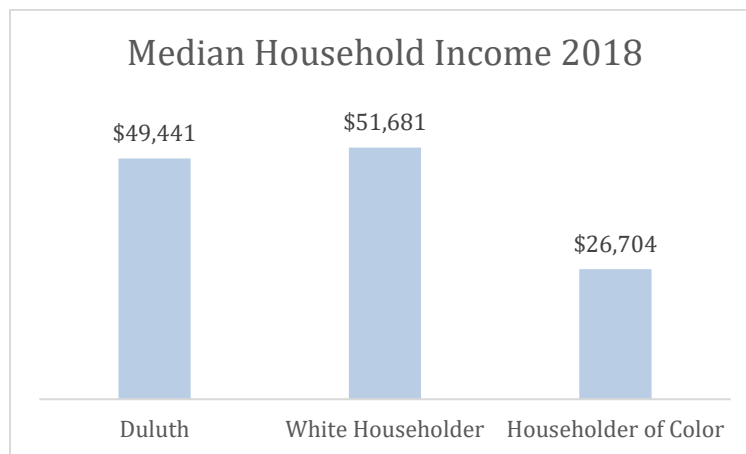
This chapter offers a brief snapshot of Duluth’s current demographics followed by a more detailed look at the demographic information we have on the seven federally protected classes: race, color, religion, sex, disability, familial status, and national origin.

We have used the most recent demographic data available from the Census Bureau, the 2014-2018 American Community Survey (ACS) five-year estimates, to offer a look at key demographic indicators in Duluth. In 2018 Duluth’s population was estimated at 86,004 people. Duluth’s population is 90% white, but has significant populations of Black, Indigenous, and Asian residents as well. While Black alone, Indigenous alone, and Asian alone populations all account for about 2% of the population each, when we look at the breakdown of racial data, we can see that many mixed-race people also identify as part of those racial groups. Ethnicity is not a protected class as described in the fair housing legislation, but it is worth noting that 2% of Duluthians are Hispanic or Latino.



2018 ACS 5-year estimates

There are just over 36,000 households in Duluth, 60% homeowners and 40% renters. On average homeowners pay 18% of their household income towards housing costs while renters pay 29% of their household income towards housing costs. The median household income in Duluth is \$49,441. Poverty in the city, as in the nation, is racialized due to a history of racially discriminatory laws and policies (some of which will be discussed later in this report). White householders have a median household income nearly \$25,000 higher than householders of color. Poverty levels have been increasing steadily over the past few decades. In 1980 12% of the population was living at or below the federally defined poverty level that increased to 16% in 2000 and 19% in 2018.

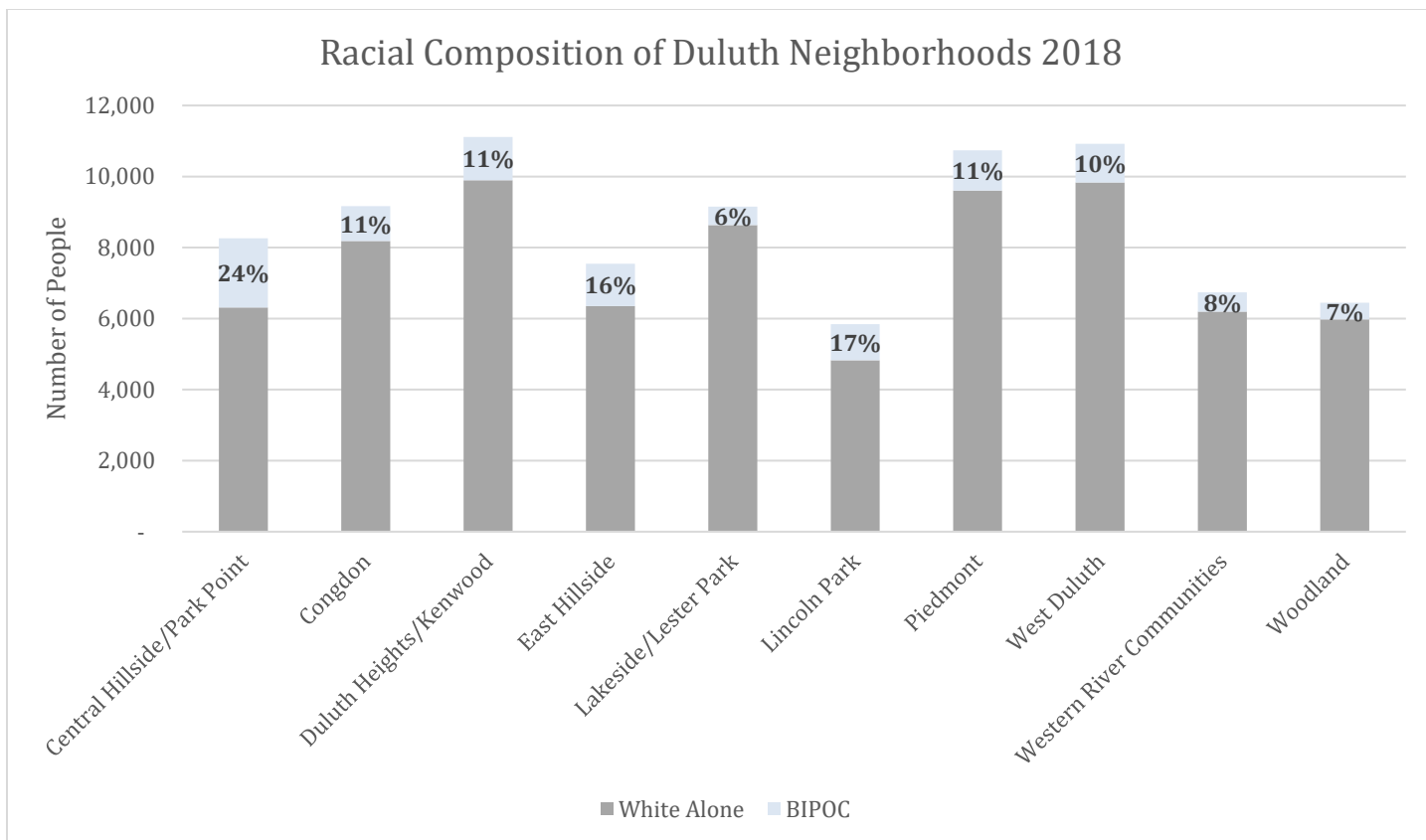


2018 ACS 5-year estimates

Race and Color

In 2000 Duluth's BIPOC residents were about 7% of the population. The number has since increased to be about 10% of the population. Since 2000, the share of householders of color has increased, as well as the proportion of householders of color in owner occupied units, but there is still a large racial disparity between white people and BIPOC in owner occupied versus rental homes. About 92% of householders are white, but 96% of homeowners are white. While 60% of Duluth housing units are owner occupied, 63% of white householders are homeowners, but only 29% of householders of color are homeowners. This shows a significant racial discrepancy in homeownership rates.

There are a few neighborhoods that are home to higher concentrations of BIPOC, all located in Duluth's most central neighborhoods. In the Central Hillside 24% of residents are BIPOC, in the East Hillside 16% of residents are BIPOC, and in Lincoln Park 17% of residents are BIPOC. No other spatial patterns of racial demographics can be easily observed in other Duluth neighborhoods due to the significant majority of the white population.



2018 ACS 5-year estimates

Patterns do exist and are evident when observing aggregate data of race and housing tenure in the neighborhoods closest to and west of downtown. These areas have the greatest mix of white and BIPOC renters as well as white and BIPOC homeowners. Those neighborhoods are the East Hillside, Central Hillside, Lincoln Park, Denfeld, Spirit Valley, and Morgan Park. Lincoln Park has the greatest mix of owners and renters of all races. Outside of these neighborhoods, few households are occupied by people of color. In Lakeside/Lester Park, Woodland, and Congdon Park, all on the east side of the city, there are more white householders overall in both renter and owner occupied housing units.

Religion

According to the Pew Research Center, 74% of adult Minnesotans practice a Christian religion, 6% practice a non-Christian religion, and 20% are not affiliated with any religion.¹⁴ Some of the non-Christian faiths practiced by Minnesotans include Islam, Judaism, Buddhism, and Native American spiritual practices.

Gender and Sex

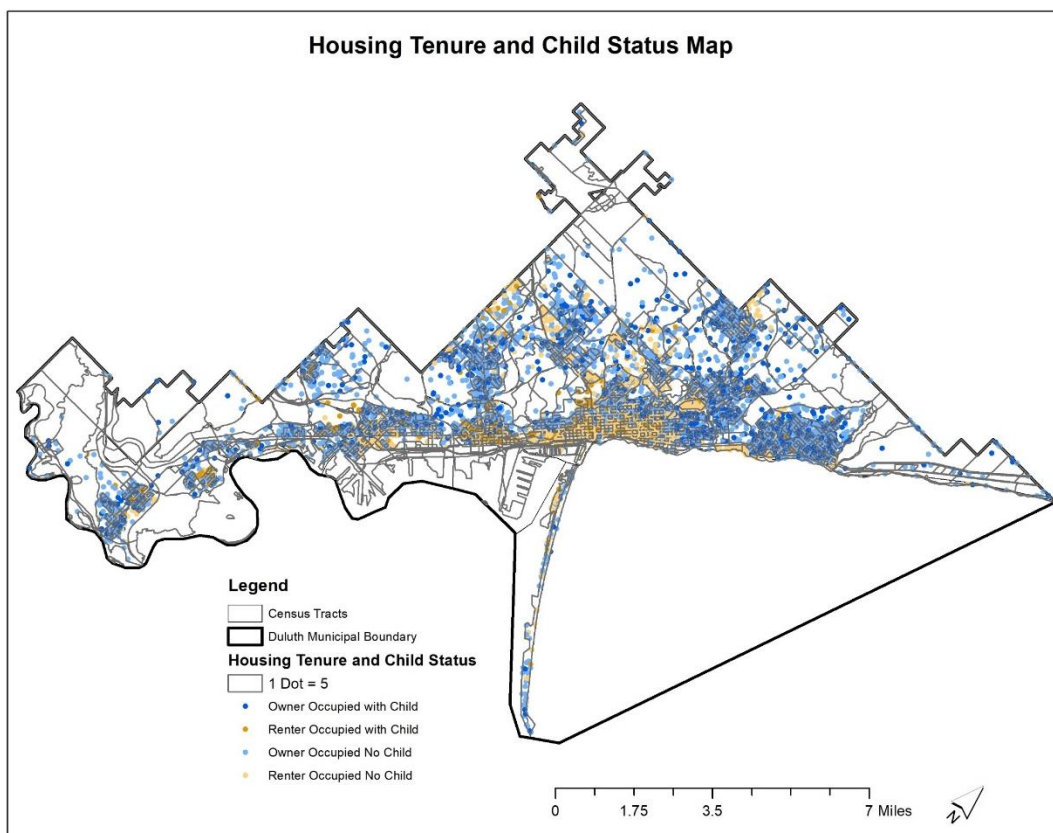
Sex discrimination includes discrimination based on a person’s sex, gender identity, or sexual orientation. Widely available demographic data sources, such as the Census and ACS offer

¹⁴ <https://www.pewforum.org/religious-landscape-study/state/minnesota/>

limited statistics on sexual orientation and do not offer statistics on gender identity. The ACS only provides data about whether people in unmarried partnerships are in a same-sex or opposite-sex relationships, therefore the data does not offer a general idea of sexual orientation in the population. The Census and ACS do offer data on the sex of the population. In 2000 females were 52% of the population and males were 48% and that has shifted slightly to 51% female and 49% male¹⁵ according to the 2018 ACS estimates. The spatial distribution of males and females throughout the city is relatively even without any significant patterns or concentrations.

Familial Status

About half (51%) of Duluth households are family households, meaning that people in the household are related by marriage, birth, or adoption. About 24% of households have at least one person under 18 living with them. Married couple families make up 38% of all households and 36% of married couples have their own children living with them. Single female householders with children are more common (6% of households) than single male householders with children (2% of households).



2010 Census Data

Some notable spatial patterns of housing tenure and child status exist in Central and East Hillside when referencing 2010 Census data. Both neighborhoods see a high percentage of

¹⁵ While not everyone is either female or male, the Census and American Community Survey only offer those two options when asking about respondents' sex.

renter-households but the renter households with children under 18 concentrate further up the hill and further to the east as East Hillside turns into the Endion neighborhood. When looking at this aggregate data, Lincoln Park neighborhood appears to have the greatest mixture of renter and owner households with or without children. Irving/Fairmont, Morgan Park, and Gary New Duluth neighborhoods also see a similar mixture of housing tenure and child status. Some of the most highly concentrated owner occupied neighborhoods (Lakeside/Lester Park, Woodland, Congdon Park, and Piedmont) see an even mix of households with children and households without children.

Disability

About 14% of the population, more than 11,000 people, living in Duluth have a disability. Older people are more likely to have disabilities. People age 65 and older account for 37% of all Duluthians with disabilities. About 44% of Duluthians with disabilities have a mobility related disability and nearly half (49%) of those people with mobility related disabilities are age 65 or older. With a large cohort of aging baby boomers nation-wide, we can expect that more of the population will have disabilities in the coming years. With the number of mobility related disabilities in Duluth, a particular concern is the physical access to housing units.

The first national accessible design standards, the American National Standards Institute (ANSI), were released in 1961 and these were just a start at moving towards more universally accessible design in buildings.¹⁶ About 64% of Duluth's housing units were built before 1960. While some of these homes may have been updated or upgraded with more universally accessible design features over the years, the reality in Duluth is that most people are likely to live in a home that has little to no design considerations for accessibility. The age of Duluth's housing stock contributes to inaccessible homes from doorways too narrow for people with mobility assistance devices to use, to stairs at every entrance and bathrooms only located on the second story, to multi-level apartment buildings with no elevators.

According to 2012 ACS estimates, persons with disabilities are not significantly concentrated in one spatial area in Duluth except for the Central Hillside neighborhood, which indicates a slightly higher concentration when compared to all other neighborhoods. A few other census tracts and corresponding neighborhoods indicate slight concentrations of persons with disabilities and those include Lakeside/Lester Park, Irving/Fairmont, and Morgan Park. Many of these areas have assisted living facilities or services that are for persons with disabilities.

Country of Origin

According to 2018 ACS data, about 96% of Duluth's population are American citizens born in the United States or US territories. About 2% of Duluth's residents are US citizens by naturalization and another 2% are not US citizens. In total about 4% of Duluth's residents were born in a country other than the US.

¹⁶ <https://www.wbdg.org/design-objectives/accessible/history-accessible-facility-design>

Chapter 4: Housing and Employment

In this chapter we discuss housing in terms of characteristics such as age, density, and renter or owner occupied statistics. Housing costs are addressed including average rent and mortgage costs as well as housing cost burden. The state of public housing is discussed through demographic and spatial trends for the voucher, high rises, and scattered sites programs. Information is provided on employment trends, particularly as they relate to housing affordability and access.

Housing Characteristics

A large percentage of Duluth's housing stock, 44%, was built before 1940 and only about 8% was built in the year 2000 or later. Neighborhoods with the majority of housing stock built prior to 1940 include Central Hillside/Park Point, Congdon, East Hillside, Lincoln Park, West Duluth (includes Lincoln Park, Denfeld, Irving) , and the Western River Communities (includes Riverside, Morgan Park, Fond du Lac). The neighborhood with the oldest housing stock is Lincoln Park with 63% of homes built earlier than 1940. All of the other neighborhoods (Woodland, Piedmont, Lester Park, and Duluth Heights/Kenwood) have majority of their housing stock built between 1940 and 1969. Duluth is a city well known for its history. While older homes can add to the historic charm or character of a neighborhood, they can also pose difficulties such as deferred maintenance or nonconformity with modern building codes for safety and accessibility. Accessibility features were not requirements during the time that a large portion of Duluth's housing stock was built. Retrofitting older houses for accessibility can improve access for those with disabilities but is often very expensive, potentially limiting the supply and location of accessible homes.

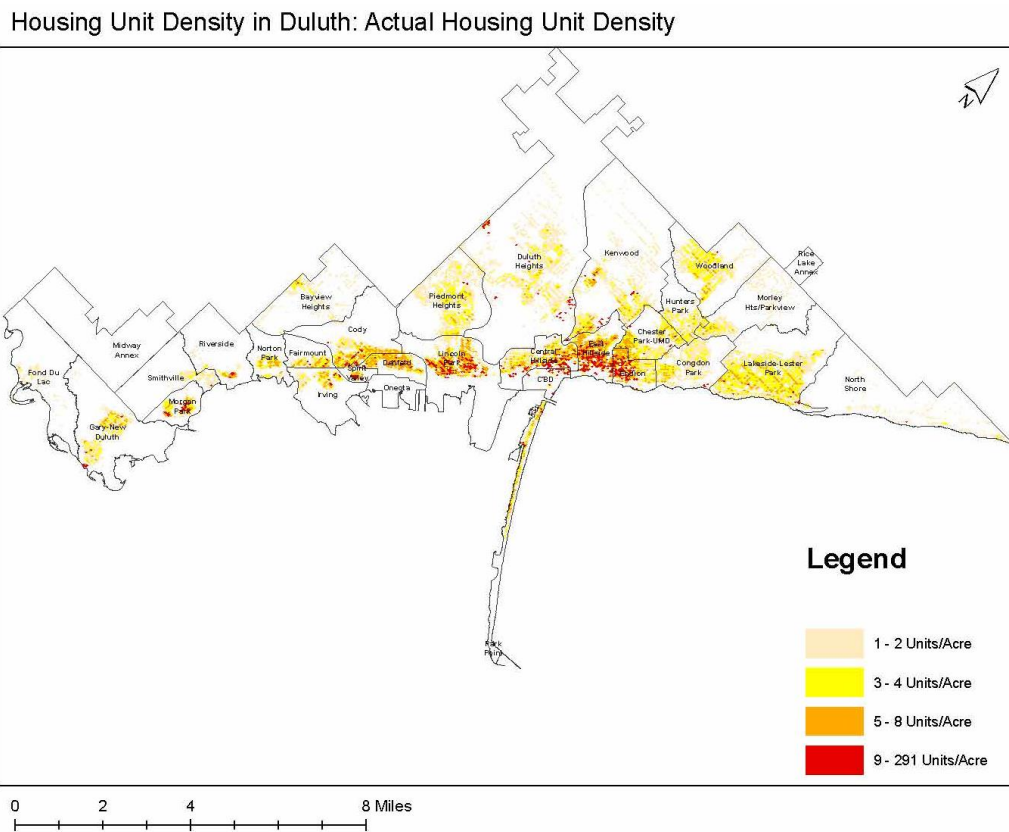
The city of Duluth has approximately 38,461 housing units with about 36,003 units occupied according to ACS data. Of all the housing units in Duluth, 64% are single-family homes, 13% are in small multiplexes (two to four units), 21% are in apartment buildings (five or more units), and 2% are some other type of housing such as mobile homes. About 40% of households rent and 60% own their homes. Neighborhoods located close to the central business district see the lowest percentages of

homeownership. Those areas include Central Hillside/Park Point with 29% owner occupied units, East Hillside with 36% owner occupied units, and Lincoln Park with 46% owner occupied units. The neighborhood with the highest homeownership rate is Woodland at 87% owner occupied units. Other high home ownership neighborhoods are Lakeside/Lester Park at 84% owner occupied units and Piedmont at 73% owner occupied units.



City of Duluth

Duluth is largely a city of single-family homes and relative low density. When referencing 2010 Census data, the greatest level of housing density (9+ units/acre) is found in Duluth’s downtown and oldest neighborhoods: Central Hillside and East Hillside. Other neighborhoods that see high levels but slightly lesser density include Lincoln Park, Denfeld, and Spirit Valley to the west of downtown Duluth. The rest of Duluth’s residential neighborhoods show 3-4 units/acre of housing density. Some of those neighborhoods are Kenwood, Lakeside/Lester Park, and Piedmont. These less dense residential neighborhoods are located further away from downtown and the former industrial waterfront, with a majority of them climbing up the geography of the hill in Duluth. Housing density is influenced by historic development patterns but also regulated through the City’s zoning code, which will be discussed later in this report.

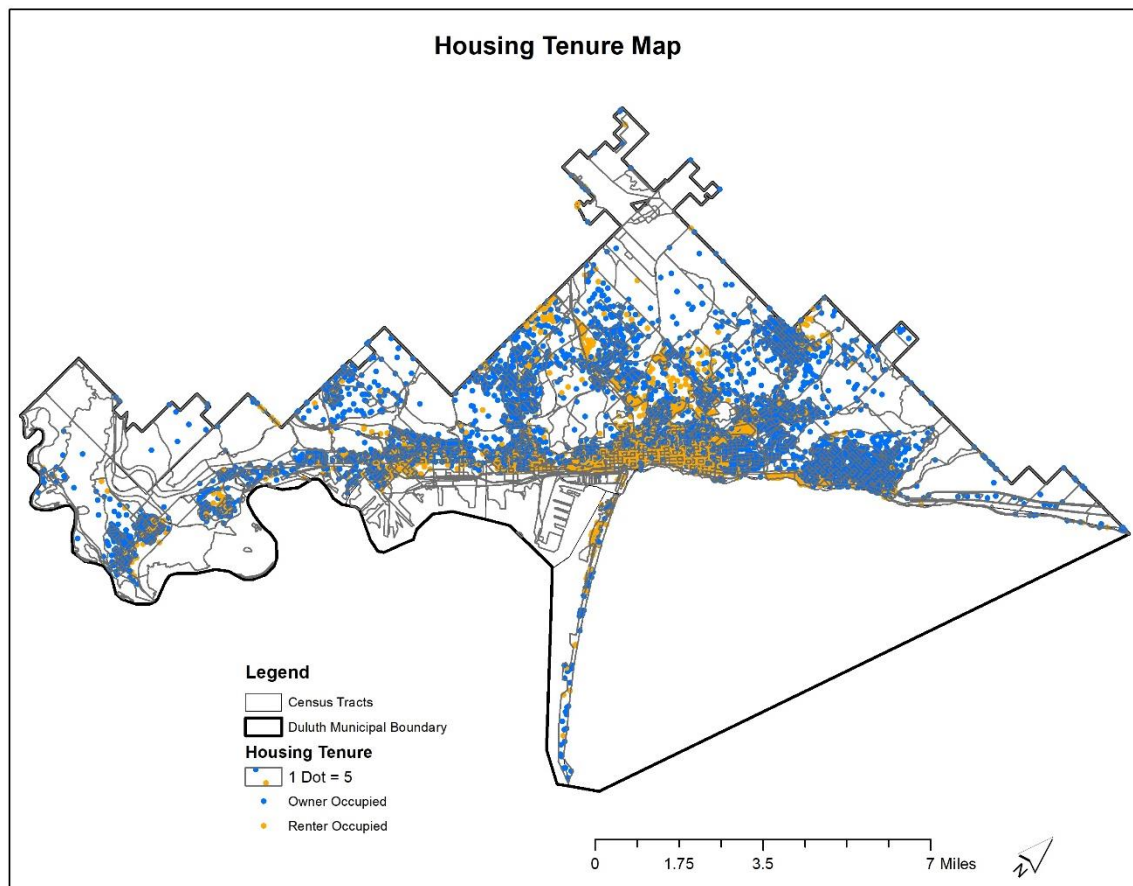


2010 Census Data

There are clear concentrations of renter households in lower Lincoln Park, Central Hillside, and East Hillside, closest to the central business district. As you climb up the hill further into these neighborhoods, the housing tenure becomes more predominantly owner occupied housing units. Other patterns of renter households can be seen along main thoroughfares in Duluth. To the west along Grand Avenue into Denfeld and Spirit Valley, there is a concentration of renter occupied households. Additionally, rental households are concentrated up the hill along Central Entrance and near institutional campuses such as UMD and the College of St. Scholastica.

When analyzing owner occupied households, concentrations can be observed most strongly to the east in Lakeside/Lester Park, Woodland, and Congdon. There are also concentrations of owner occupied households in Piedmont and Bayview Heights but these are lesser when compared to the former three neighborhoods.

Some of the notable mixed housing tenure neighborhoods include Gary New Duluth, Morgan Park, Irving/Fairmount, Duluth Heights, and Kenwood according to 2010 census data. There is also a mix of housing tenure on Park Point, which is likely skewed by the amount of vacation rentals in that area.



2010 Census Data

Public Housing

The Duluth Housing and Redevelopment Authority (HRA) was created by state-enabling legislation and approval of the city of Duluth in 1948. A seven-member Board of Commissioners governs the HRA. Commissioner terms are staggered five years and the Mayor of Duluth appoints all commissioners with approval by Duluth City Council. The HRA owns and manages over 1,000 units of public housing as well as administers multiple housing voucher programs with over 1,400 active users.

Housing Vouchers

The HRA administers approximately 1,453 housing vouchers to households throughout Duluth in addition to providing housing through public housing high rises and scattered sites. The most widely used voucher program is the Section 8 Housing Choice Voucher (HCV). Other smaller programs include project based, veterans, or homeowners with about 150 vouchers total. Of the larger HCV subset, which are all vouchers in the private rental market, 24% of households were Black, 10% of households were Indigenous, 69% of households were female, and 50% of households had a disability in 2018. The citywide population of Duluth is 3% Black, 2% Indigenous, 51% female, and 14% people with disabilities indicating disproportionate populations of a number of protected classes using Section 8.

About 200 HCVs were issued in 2018 and the current waitlist to receive a Section 8 HCV in Duluth has 2,935 individuals with a wait time of about 24 months. The voucher utilization rate in 2018 was approximately 54%. This figure is low due to the short utilization window and tight rental housing market however, it indicates that there can be significant difficulty in securing housing even after exiting the waitlist and receiving a Section 8 HCV.

Out of all of the Section 8 HCVs, nearly 75% of users find housing in the 55805, 55806, and the 55807 zip codes. Neighborhoods in these zip codes include East Hillside, Central Hillside, Goat Hill, Lincoln Park, Denfeld, Oneota, Spirit Valley, Irving/Fairmount, and Norton Park. All of these neighborhoods are located adjacent to downtown Duluth or on the west side of the city. Zip codes with the smallest number of vouchers are 55803, 55804, and 55810 including neighborhoods such as Woodland, Hunters Park, Lakeside/Lester Park, and Bayview Heights, most of which are located on the east side of the city. HCVs are meant to be used almost anywhere but include federally moderated rent caps that may limit where a voucher holder is able to find attainably priced housing.

High Rise Public Housing

Another housing program administered by the HRA is public housing. There are six public housing high rises in the City of Duluth spread among three areas: Central Hillside, Lincoln Park and Spirit Valley. All high rises are multifamily buildings built in the mid to late 20th century. Approximately 721 households were active in public housing high rises in 2018. Of these households, 12% were Black, 8% were Indigenous, and 53% had a disability. The gender



City of Duluth

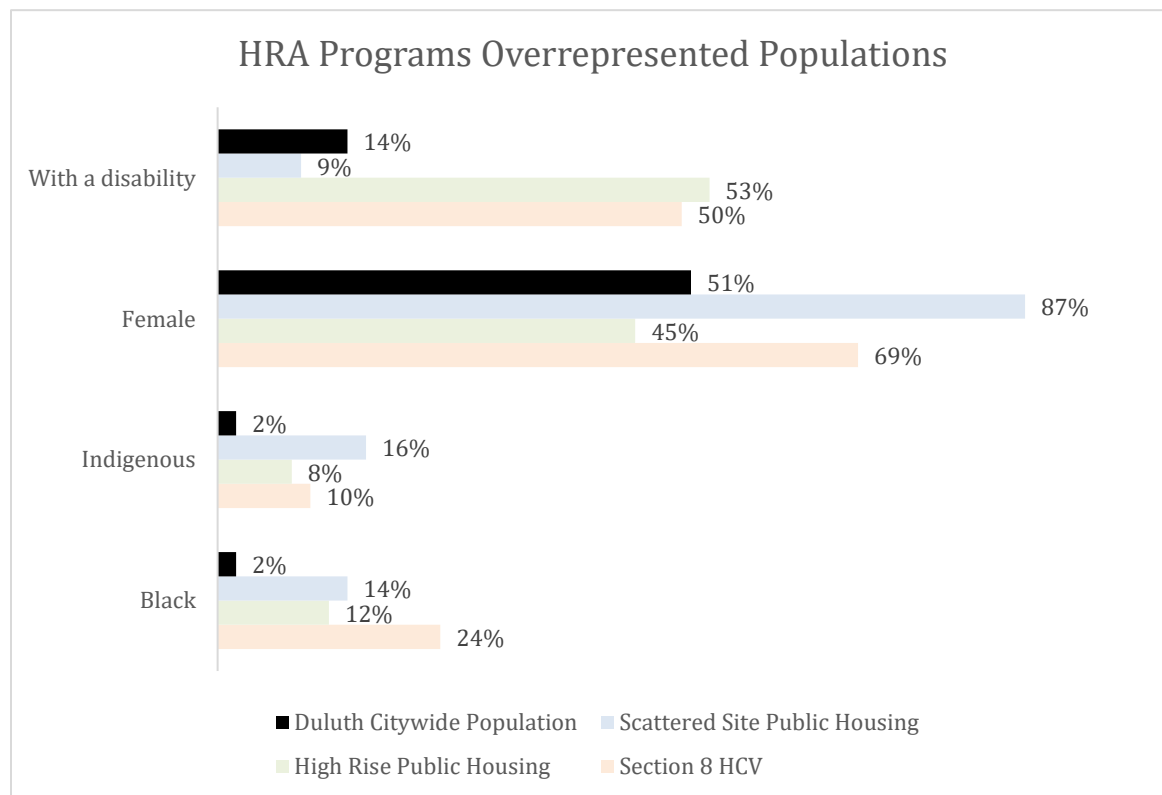
make-up of households living in high rises is different from those using Section 8 HCVs, there is a more even split with 55% males and 45% females.

There are about 1,879 households on a waitlist for public housing, including high rises and the scattered sites program. Waitlists differ by bedroom size with the most requested bedroom size being a one-bedroom apartment. The overall wait times for any bedroom size is 12-18 months.

As previously mentioned, there are six high-rise public housing structures in Duluth. Two are located in the Lincoln Park neighborhood both on the same block, housing 210 households. Three structures are located in the Central Hillside, all clustered together between two blocks housing 419 households. The last public housing facility is located in Spirit Valley, accommodating 92 households. It is notable that all public housing structures are located close to the downtown area of Duluth or in western neighborhoods, all of which have connections to public transit and are in higher housing density neighborhoods. Household demographics for race, gender, and disability status are relatively similar among all of the six public housing high rises. The average household size is 1.1 for all high rises indicating that households with children are not often using this program for housing.

Scattered Site Public Housing

There are approximately 287 households in public housing scattered sites throughout Duluth. The race and gender demographic data for this type of public housing was calculated from a larger dataset. Public housing scattered site households are approximately 14% Black, 16% Indigenous, and have a significantly higher percentage of females (87%) but lower percentage of households with disabilities (9%) when compared to the city average. Households in scattered sites are more commonly larger households or households with children compared to those in public housing high rises. This is largely due to the nature of the program using single-family homes in lower density residential neighborhoods.



Duluth HRA data 2019

Scattered site public housing is relatively scattered across the city of Duluth and consists of mostly single-family homes. Areas in Duluth that see few or no scattered sites include Duluth Heights, Bayview Heights, Riverside, and the Fond du Lac neighborhood. This can largely be contributed to the fact that these areas have lower density housing and less frequent transit service, making site selection less available or attractive.

Housing Costs

According to the City's 2019 Rental Survey, the average market rate rent was \$1,083 per month. For better context, the average rent for a one-bedroom apartment in Duluth is \$937 per month. The neighborhood with the lowest average rent in 2019 was Lincoln Park with an average of \$713 per month. Conversely, the neighborhood with the highest average rent was Lakeside/Lester Park with an average of \$1,920 per month. These figures indicate differences in affordability in different neighborhoods compared to the city's average rent.

For homeowners, median monthly owner costs were \$991 in 2018 based on ACS estimates. Broken down further, median costs for households with a mortgage were \$1,229 and median costs for households without a mortgage were \$484. The term selected monthly owner costs is defined by the Census Bureau as the sum of payment for mortgages, real estate taxes, various insurances, utilities, fuels, mobile home costs, and condominium fees. Based on the City's 2018 Housing Indicator Report, the average home market value for 2018 was \$174,807, an increase of \$2,849 between 2017 and 2018. There were 1,202 valid single family home sales listed for 2018 with the average price of \$201,795 and median price of \$173,500, both figures showing an increase of \$5,319 and \$2,300 respectively.

Housing cost burden is determined by assessing what percentage a household spends on costs such as rent or mortgage payments, utilities, insurance, etc. To be housing cost burdened, one would have to spend 30% or more of their household income on housing costs. According to ACS estimates, Duluth has 32% of all households considered to be cost burdened, with 51% of renters cost burdened and 19% of owners cost burdened.

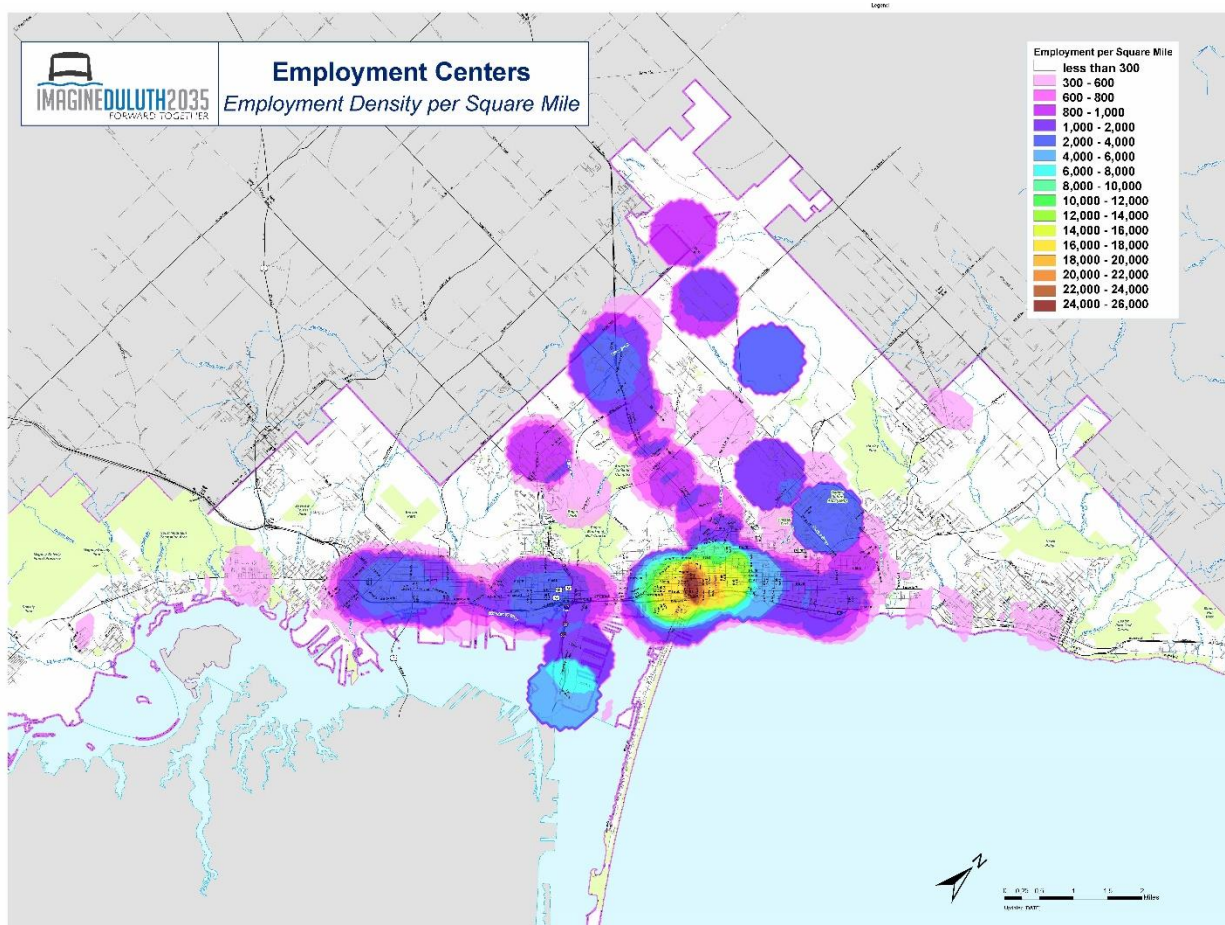
Employment

The most dense employment center in Duluth is the central business district (downtown). The highest level of employment density is located at the junction of N Lake Avenue and W 2nd Street, within a few blocks radius. This area has 24,000-26,000 jobs per square mile according to 2010 Census data. Radiating from this junction, employment density gradually decreases as it enters into the dense residential neighborhoods of Central Hillside and East Hillside. Additionally, Rice's Point, to the southwest of downtown is a high-density employment center, acting as Duluth's port terminal.

Secondary employment centers stem out from the central business district via major roadways or along natural geographic features mostly to the west and up the hill to the north. These secondary employment centers include the Mall area, Institutional campuses, Piedmont's

commercial area, Duluth Airport, Lincoln Park, and Spirit Valley. These areas see a range of 800-4,000 jobs per square mile according to Census Bureau data.

Notably, areas located furthest from downtown or geographically disconnected (Park Point) see the least dense employment concentrations equaling 600 jobs or less per square mile. These areas include Lakeside/Lester Park, Woodland, Gary & New Duluth, Fond du Lac, and Park Point which are predominantly residential neighborhoods.



Imagine Duluth 2035, 2010 Census Data

Housing density follows these employment centers closely with the densest level of housing (9-291 units/acre) being located in neighborhoods adjacent to the central business district (Lincoln Park, Central Hillside, East Hillside, Endion). Other patterns of housing density can be observed in West Duluth including Denfeld, Spirit Valley, and Cody, which run along previously mentioned employment centers and local commercial thoroughfares.

According to the Minnesota Department of Employment and Economic Development (DEED) Duluth's unemployment rate is 2.9%. By other metrics, the percentage of working age adults who are employed throughout the city of Duluth is at 75% according to ACS data. When breaking down by neighborhood, this employment figure is comparatively lower in the Central

Hillside neighborhood near downtown, and in the Duluth Heights/Kenwood neighborhoods near the College of St. Scholastica and Mall area employment center. The most highly employed neighborhoods are Congdon, Lester Park, and Woodland with over 80% of the working age workforce employed.

The employment centers in Duluth follow major roadways and geographic features. The Duluth Transit Authority (DTA) transit stops and shelters follow these factors closely through bus service. More transit shelters and stops are concentrated in the central business district and adjacent dense residential neighborhoods. All other employment centers are serviced along mostly commercial thoroughfares. However, the frequency of route varies when leaving the downtown area often depending on housing density to support the route. DTA frequencies range from 15 minutes to 60 minutes depending on peak hours and route location. For example, highest frequency routes service the Hillside neighborhoods, Endion, the Mall Area, institutional campuses, and Oneota Business Park where the residential and employment densities are higher.

The average annual wage in Duluth was \$47,227 in 2018. Duluth has experienced a 15% increase in its average annual wage over the past eight years. Duluth's annual wage is above average in comparison to other large cities in Minnesota. Only St. Paul and Minneapolis have higher average annual wages than Duluth.¹⁷ About 41% of workers earn \$40,000 or more each year, 37% of workers earn \$15,001-\$39,999 each year, and 23% of workers earn \$15,000 or less.¹⁸ The majority of workers in Central Hillside/Park Point, East Hillside, Lincoln Park, West Duluth, and the Western River Communities neighborhoods make \$15,001-\$39,999 a year. Almost all of these areas are located directly adjacent to downtown or on the west side of the city. The majority of workers in the Piedmont, Duluth Heights/Kenwood, Congdon, Woodland, and Lakeside/Lester Park neighborhoods make \$40,000 or more a year. Most of these neighborhoods are located to the east or up the hill from downtown Duluth.

¹⁷ Minnesota Department of Employment and Economic Development (DEED)

¹⁸ Minnesota Compass

Chapter 5: Policies and Practices

Institutional Policies and Fair Housing Enforcement

Redlining

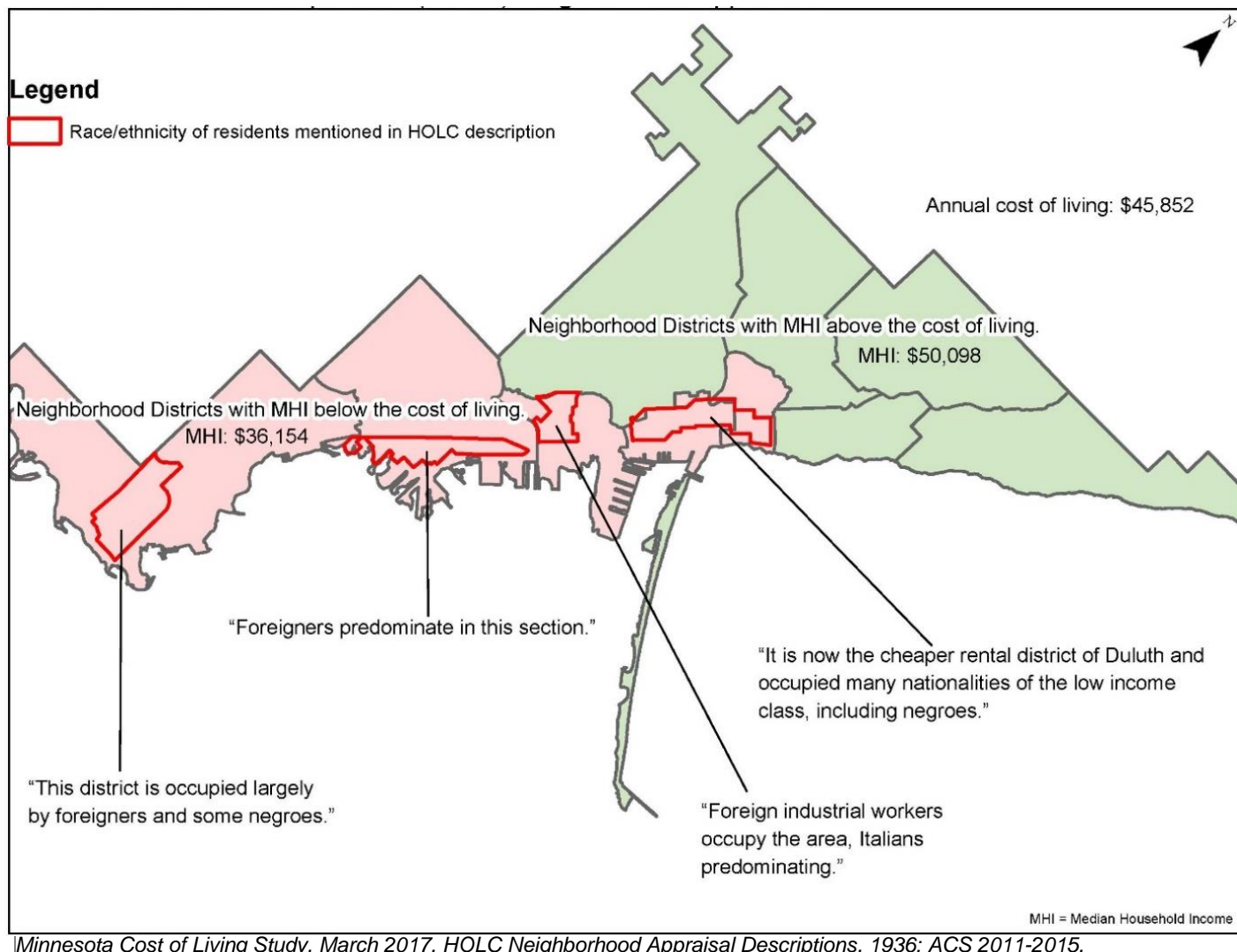
Racist government policies caused the segregation of BIPOC into lower income neighborhoods in Duluth and in cities across the country. Redlining is a federal policy that systematically prevented Black families and other families of color from getting home loans. Even though the practice of redlining was eventually outlawed, it created a lasting legacy of segregation and racialized poverty. Redlining denies families of color the ability to gain generational wealth through homeownership in the same ways as their white counterparts. In the 1930s Federal Housing Administration (FHA) policies informed how home loans were granted in the United States. The Home Owners' Loan Corporation (HOLC), a government-sponsored corporation created as part of the New Deal, evaluated neighborhoods in cities across the country. Often the HOLC graded neighborhoods where Black people and immigrants lived very low based on the fact that nonwhite people lived there, rather than on an objective evaluation of the housing stock. Redlining systematically prevented Black and other minority families from getting home loans. From 1934-1962 98% of the \$120 billion worth of home loans subsidized by the government were given to white families, effectively locking nonwhite families out of home ownership. Real estate agents followed underwriting guidelines that directed them to maintain segregated neighborhoods because "inharmonious racial groups" could lower real estate values and "lessen the desirability of residential areas."¹⁹ The effects of redlining were compounded over time. White families were able to purchase homes and accrue wealth. This influx of wealth attracted new businesses and resulted in increased property values which allowed white families to accrue even more wealth and send their children to college, passing down their wealth and advantages to future generations.²⁰

Many of the areas that were deemed too risky for investment in 1936, continue to be the lowest income areas in the Duluth today.²¹ In the 1936 HOLC neighborhood appraisals of Duluth, there were four neighborhood area descriptions that referred to the race or ethnicity of the residents. These four areas are located in areas that are now the five lowest income neighborhood districts in the city: East Hillside, Central Hillside, Lincoln Park, West Duluth, and Western River Communities. These districts all have median household incomes that are below the estimated cost of living for our region. Even if they had lower grade areas, the neighborhood districts that had no descriptions about race or ethnicity in 1936 are now the highest income neighborhood districts in Duluth, all with median household incomes above the cost of living for the region. These neighborhoods include: Piedmont, Duluth Heights/Kenwood, Woodland, Congdon, and Lakeside/Lester Park.

¹⁹ <https://dsl.richmond.edu/panorama/redlining/#loc=11/46.753/-92.136&city=duluth-mn&text=intro>

²⁰ <https://www.trutv.com/shows/adam-ruins-everything/blog/adams-sources/adam-ruins-the-suburbs.html>

²¹ Minnesota Cost of Living Study, March 2017, HOLC Neighborhood Appraisal Descriptions, 1936; American Community Survey 5-year Estimates, 2011-2015. Note that the Park Point Neighborhood was given a low HOLC grade only because it was seasonal at the time. <https://dsl.richmond.edu/panorama/redlining/#loc=11/46.7525/-92.1365&opacity=1&city=duluth-mn>



Minnesota Cost of Living Study, March 2017, HOLC Neighborhood Appraisal Descriptions, 1936; ACS 2011-2015.

Land Use and Development Policies

The City of Duluth operates under a Unified Development Code (UDC). All new housing developments must fit under this zoning code or apply for and receive an applicable exemption, such as a variance or special use permit. The UDC is reviewed for changes periodically and was last revised in January 2019. The history of land use regulation and zoning in the United States has strong ties to systematized racial segregation.²² This section will provide an analysis of local land use regulations, including any patterns of segregation.

The term “traditional neighborhood” is used in the UDC to describe lower density neighborhoods consisting of mostly single-family homes. This language speaks to some of the exclusionary origins of land use and zoning. In fact, some of the earliest zoning codes adopted in the United States specified areas where Black people could not live in order to maintain segregated neighborhoods. Having explicit “white zones” and “Black zones” in zoning code was shortly

²² <https://www.huduser.gov/portal/sites/default/files/pdf/EM-Newsletter-spring-2018.pdf>

overturned by the Supreme Court, but that did not stop the practice of excluding BIPOC families from white neighborhoods. Zoning codes continued to be used by cities to systematically create white enclaves and to keep noxious industrial facilities away from those white neighborhoods.²³ BIPOC families who moved into white neighborhoods were often terrorized and threatened and many homes in white neighborhoods include restrictive covenants in the deeds that did not allow the homes to be sold, or even rented, to non-white families. In the 1950's, with the help of highways and the GI bill, white families left dense urban areas for low-density single-family neighborhoods in the suburbs.²⁴ The UDC does not include racially explicit language, but to label these types of neighborhoods as "traditional" whitewashes their exclusionary history.

Duluth is a city with relatively low density. Most land in Duluth is zoned R for residential and 31% of these residential areas are zoned R-1, which accommodates "traditional neighborhoods" of mostly single-family homes. The next most common zoning category that allows residential use is Mixed Use or MU districts, allowing for both commercial and residential land use. The most flexible zoning districts allowing residential use are form districts. These areas make up 1% of the total land area and consists of seven different types, all of which add flexibility through site layout and aesthetic building standards that disregard use.

The two most spatially prevalent R zoning districts do not allow multifamily dwellings without special use permits, therefore limiting density and overall supply of housing.²⁵ Some zoning districts allow for more flexibility such as form and MU districts but as stated before, they make up a lesser percentage compared to R zoned districts. Additionally, zoning codes can often restrict the number of individuals living in a home making it difficult for residential care facilities to operate. Residential care facilities are allowed in most zoning districts in Duluth with both six or less and seven plus people being allowed (although with a special use permit) in R-1 zones, the most common zoning district. Cluster development is also considered a more inclusive housing option and is allowed by the City's development code. Cluster development is a grouping of residential properties on a development site where the remaining portion of the site is most often used for open space, recreational space, or conservation. However, this type of development is only allowed in Residential Planned zones, or R-P, which makes up less than 1% of all zoning districts. Overall, it appears that different levels of flexibility, use, and density are allowed by Duluth's UDC but in very limited areas of the City.

Since the last AI in 2015, six UDC changes have passed via ordinance that could have minor impacts on fair housing in Duluth. Some of those ordinance topics include adding flexibility to parking regulations, increasing building typology options for developers in form districts, and allowing for greater density in MU districts. One change increased restrictions on townhome developments, requiring separate front entrances and slightly larger setbacks. The most notable change to the UDC was in December 2019 when the city's Planning Commission and City Council approved an ordinance allowing for smaller residential lot sizes and the potential to build tiny homes. The City of Duluth has already allowed accessory dwelling units in its

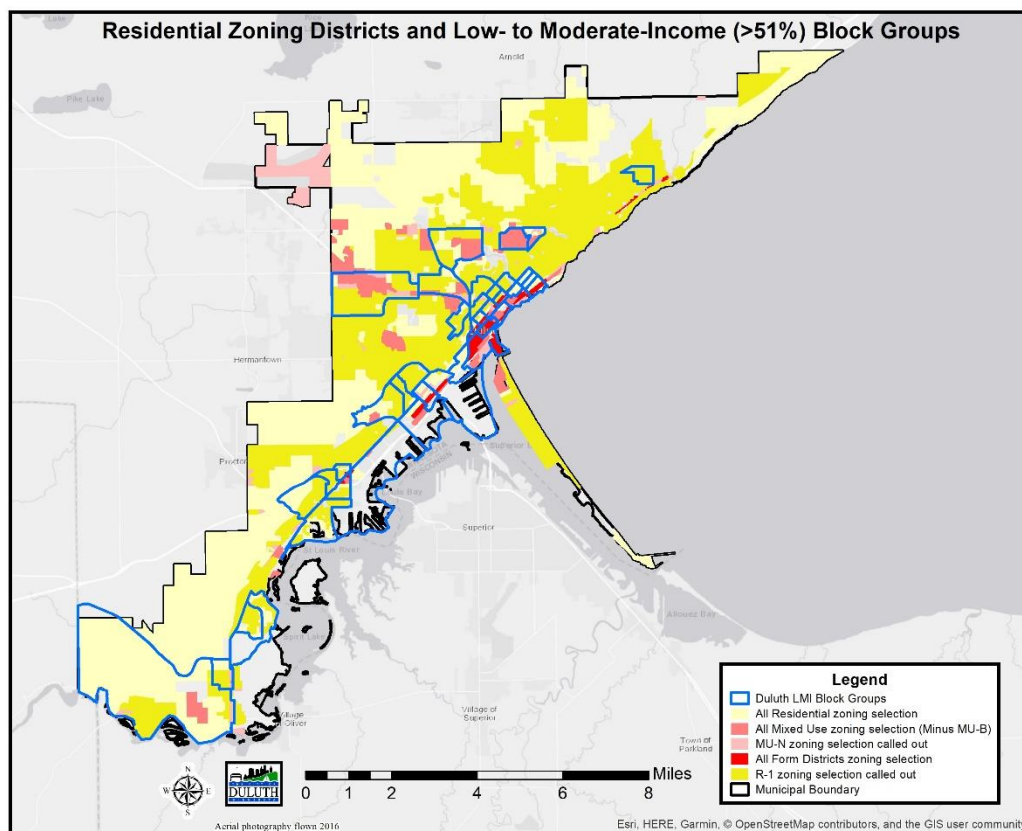
²³ Chapter 3: Racial Zoning from The Color of Law – Richard Rothstein

²⁴ Chapter 5: White Flight from The Color of Law – Richard Rothstein

²⁵ <https://www.mercatus.org/system/files/lkeda-Land-Use-Regulation-summary.pdf>

development code but this ordinance is a shift towards even greater flexibility. As stated before, tighter restrictions on land use and density often lead to higher land prices, constrained housing supply, and higher housing costs that all have an impact on fair housing choice. This shift towards greater flexibility and density has the potential to provide more housing options, but should be monitored for effectiveness in the coming years.

When overlaying the City's zoning map with spatial demographic data a few patterns are evident. Less restrictive zoning designations such as form districts or higher density R districts can more commonly be found in HUD-designated low- to moderate-income block groups. BIPOC households are also found more prevalently living in neighborhoods such as Lincoln Park and the Hillside neighborhoods, and these areas generally have more flexible and dense zoning standards. It is difficult to determine how much of a direct impact current zoning and land use policies have on these patterns but they indicate that greater restrictions can lead to racial and economic based exclusionary outcomes.



2011-2015 LMI Block Groups, City of Duluth GIS

The City of Duluth could be more intentional in creating inclusive housing options by researching alternative zoning strategies such as an inclusionary zoning ordinance or housing overlay zones. The first idea looks at increasing incentives for housing developers to create affordable housing by giving density bonuses or reducing administrative costs through a

mandatory or optional ordinance.²⁶ The second idea looks at targeting areas for more housing via a spatially tied overlay zone that allows for housing development that wouldn't normally be allowed in the original zoning district.²⁷ A current tool used by the city to incentivize housing development is Tax Increment Financing (TIF). This tool is already a substantial contributor to the city's housing supply but is not exhaustive. Programs and policies that contribute to retrofitting for accessible units are not a focus of TIF and should become an additional focus considering the demographic changes mentioned previously.

City Human Rights Office

The City of Duluth Human Rights Office works under federal, state, and local human rights laws to review and investigate complaints of discrimination based on legally protected classes. In 2016, the City of Duluth updated its Human Rights Ordinance to clarify the powers and duties of the Human Rights Commission and the Human Rights Officer. This update more clearly laid out the process for collecting and investigating human rights complaints. Since then, the Human Rights Commission along with the Human Rights Office have worked to streamline the complaint and investigation process and provide the community with information about how to make a complaint. The Human Rights Commission consists of community members appointed by the Mayor. The Commission has protocols for investigating and evaluating discrimination complaints submitted by members of the community to determine if further action is required to address and resolve the complaint. The Discrimination Intake Questionnaire, which is available online, is shown here.

CITY OF DULUTH HUMAN RIGHTS OFFICE
DISCRIMINATION INTAKE QUESTIONNAIRE

- Provide as much contact information as possible. If the Office cannot locate you, your case may be dismissed.
- This information is only used to investigate your complaint and no for no other purposes.
- There is no filing fee to draft a complaint.
- You have one year from the date of the alleged discrimination to file a charge.
- An attorney is not required to file a charge though some people do hire an attorney.
- To speak with someone about your rights under the Duluth Human Rights Ordinance or for more information about filing a charge of discrimination, feel free to call or email the Human Rights Office.

First Name _____ Last Name me _____
 Phone Number _____ Email _____
 Address _____ City _____ State _____ Zip _____

You feel you were discriminated against based on: (check all that apply)

- | | | | |
|--|---|---|-------------------------------------|
| <input type="checkbox"/> Race | <input type="checkbox"/> Color | <input type="checkbox"/> Creed | <input type="checkbox"/> Religion |
| <input type="checkbox"/> National Origin | <input type="checkbox"/> Sex | <input type="checkbox"/> Sexual Orientation | <input type="checkbox"/> Age |
| <input type="checkbox"/> Marital Status | <input type="checkbox"/> Public Assistance Status | <input type="checkbox"/> Familial Status | <input type="checkbox"/> Disability |

You can mail, fax, email, or hand deliver this form to the Human Rights office (see contact info below.) Submitting this form does not mean you have filed a complaint. This form is part of an intake process. You can also begin the intake process by calling, visiting, or emailing the Human Rights Office. This is the first step to initiating a Discrimination Complaint and you will be contacted by the Human Rights Office to further discuss and investigate alleged discriminatory act(s) and the investigatory process.

City Of Duluth Human Rights Office

City Hall, Room 407
 411 West First Street
 Duluth, MN 55802
 (218) 730-5630
 Fax: (218) 730-5904
 Email: HumanRights@duluthmn.gov

<https://duluthmn.gov/human-rights-office/>

²⁶ <https://www.citylab.com/equity/2018/07/citylab-university-inclusionary-zoning/565181/>
²⁷ <https://homeforallsmc.org/toolkits/housing-overlay-zones/>

In the past few years, the City of Duluth Human Rights Office has drastically improved its discrimination complaint process, including fair housing related complaints. In the past, someone who wanted to file a complaint had to pick which type of complaint form best fit their situation (housing, employment, education, etc.) but now there is one brief, easy to fill out form for all discrimination related complaints. The form simply asks people for their contact information and what they feel they were discriminated based on (race, national origin, disability, etc.). The Human Rights Office then assists the person in determining if and how to file a formal complaint. The form is available as a fillable pdf, paper copy, or can be submitted via an online form. The Human Rights website also offers helpful resources to understand protected classes and area of protection the City’s Human Rights Ordinance covers.

Coverage of the Duluth Human Rights Ordinance

Protected Class	Areas of Protection							
	Employment	Housing	Public Accommodation	Public Service	Education	Credit	Business	
Race	•	•	•	•	•	•	•	
Color	•	•	•	•	•	•	•	
Creed	•	•	•	•	•	•		
Religion	•	•	•	•	•	•		
National Origin	•	•	•	•	•	•	•	
Sex	•	•	•	•	•	•	•	
Marital Status	•	•	•		•	•		
Disability	•	•	•	•	•	•	•	
Public Assistance Status	•	•		•	•	•		
Age	•				•			
Sexual Orientation	•	•	•	•	•	•	•	
Familial Status	•	•						
Local Human Rights Commission Activity	•							

<https://duluthmn.gov/human-rights-office/>

In 2019, 10 discrimination complaints were brought to the attention of the Human Right’s Office. Eight of the complaints were based on racial discrimination and two were based on disability. Both of the disability discrimination complaints were related to ADA compliance issues in housing. The racial discrimination complaints were related to public services, housing, and employment.

Federal Fair Housing Cases

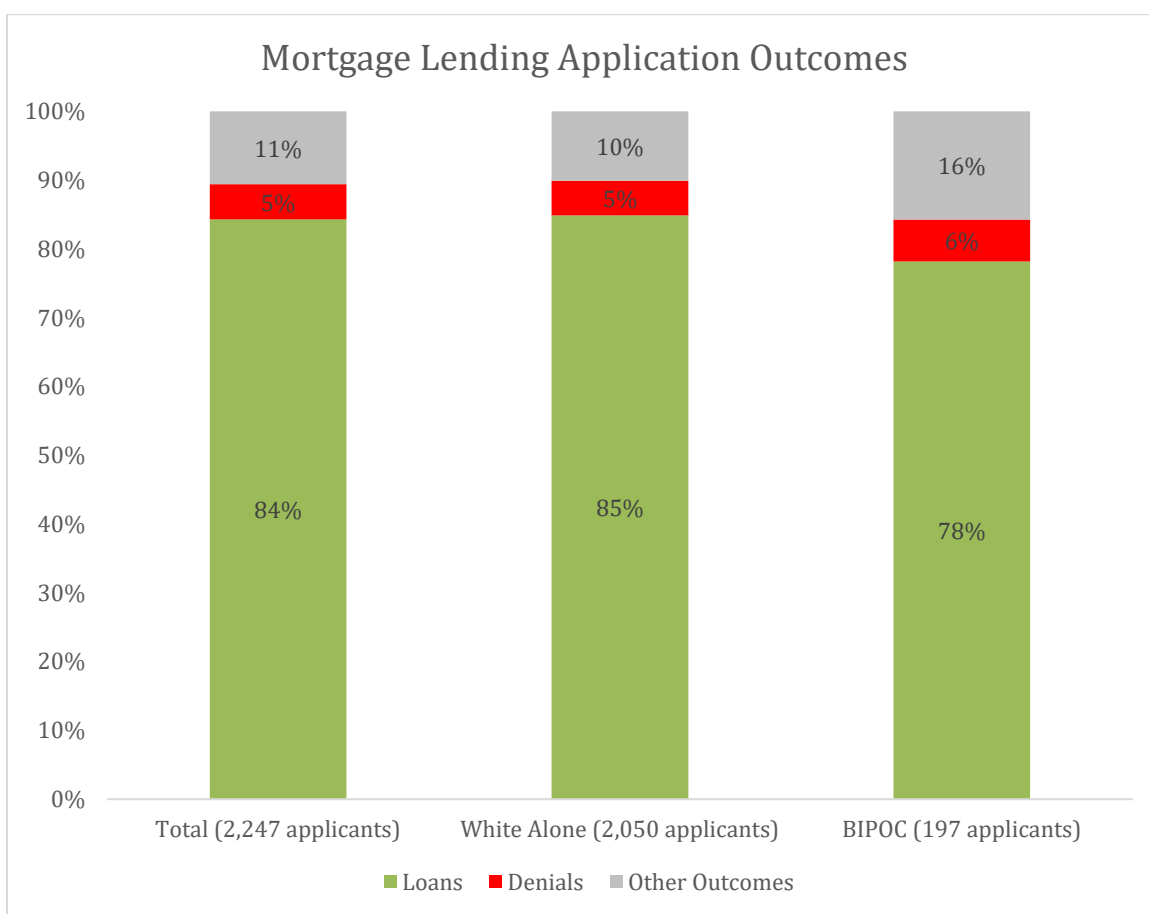
From 2010 to 2016 there were 28 Title VIII fair housing cases filed by HUD’s Office of Fair Housing and Equal Opportunity (FHEO) in St. Louis County, MN. In total, 25% of the cases

were filed on a racial discrimination basis, all of them discrimination against Black or African-American people, and 71% of the cases were filed on a disability basis.²⁸

Access to Housing

Mortgage Lending

Underwriting guidelines for mortgage lending used to be explicitly racist.²⁹ Although those explicit policies have been abolished, there still appear to be patterns of discrimination and segregation in mortgage lending today.³⁰ An examination of mortgage lending applications in Duluth from 2015-2016 shows that BIPOC are applying for home loans at a roughly proportional rate to their share of the population; 10% of the population is BIPOC and 9% of the total loan applicants were BIPOC. BIPOC have a slightly lower loan approval rate (78%) than white people (85%) and a slightly higher “other outcomes” rate (16%) than white people (10%).³¹



[revealnews.org/redlining](https://www.revealnews.org/redlining), Home Mortgage Disclosure Act 2015-2016

²⁸ <https://catalog.data.gov/dataset/fheo-filed-cases>

²⁹ <https://hdl.handle.net/2027/mdp.39015018409246?urlappend=%3Bseq=89>

³⁰ <https://www.revealnews.org/blog/we-exposed-modern-day-redlining-in-61-cities-find-out-whats-happened-since/>

³¹ Reveal from The Center for Investigative Reporting.* Mandatory link: [revealnews.org/redlining](https://www.revealnews.org/redlining)

Section 8

It is common in Duluth to find ads in the private rental housing market exclusively stating that the property owner is not accepting Section 8. There are a variety of reasons a landlord or property owner can use to explain why they do not want to rent to a HCV holder. Some reasons include additional perceived risk or work involved in complying with Section 8 housing standards.³² Regardless of reason, up front denial of Section 8 voucher holders disproportionately impacts a number of protected classes in the City of Duluth according to HRA data cited previously. A greater share of voucher holders are Black, Indigenous, female, and with a disability compared to the entire population of Duluth and the utilization rate of vouchers issued in 2018 was 54% indicating a significant difficulty in finding an apartment after receiving a voucher. Furthermore, the 2018 Housing Indicator report published that the city’s overall rental vacancy rate was 3.2% in 2018, a tightening of 1.6% from 2017. Low vacancy rates make it difficult for all renters to find an apartment. Section 8 voucher holders face this same difficulty but in addition to the barriers presented by private leasing practices banning Section 8.

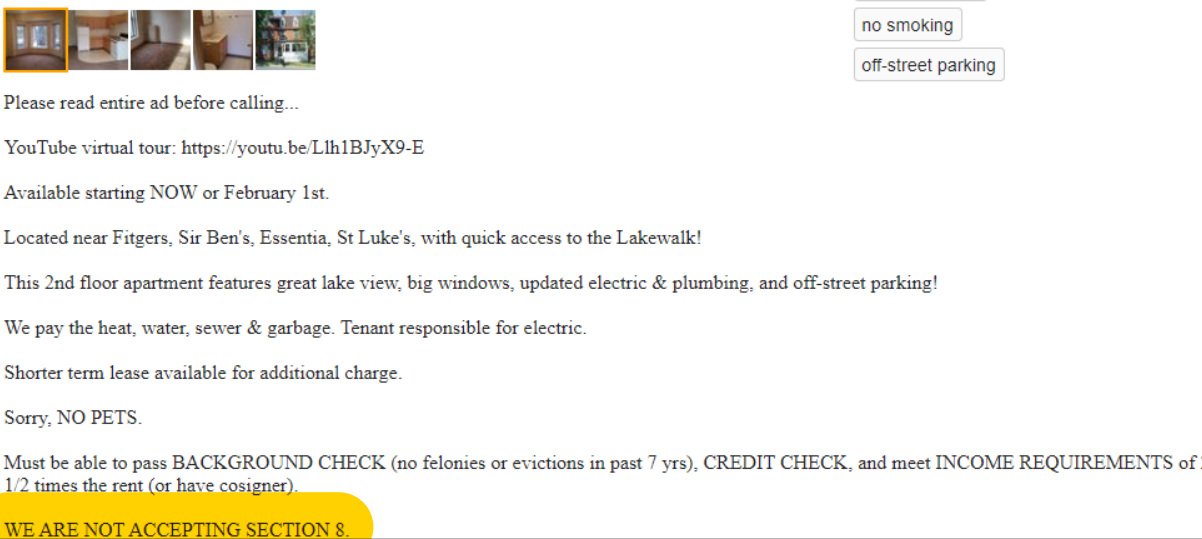
Widespread denial of prospective tenants based solely on voucher holder status has a discriminatory effect on protected classes. In light of this, it should be best practice for tenants to be screened on a case by case basis using other legal tools such as landlord or character references to help make leasing determinations. Many cities, including Minneapolis, MN, have faced this issue and addressed leasing practices through local legislation including a Section 8 anti-discrimination ordinance. Minneapolis’ 2017 ordinance prohibited landlord discrimination against Section 8 Housing Choice Voucher holders and aimed to put voucher holders on even footing with other apartment seekers in Minnesota.³³ In tandem with the protection ordinance, the Minneapolis City Council directed staff to create landlord incentive programs and make enhancements to the local Section 8 inspection program to help ease the transition and lessen barriers to housing for voucher holders. In Duluth, to make housing more accessible it is worth considering legislative options or programs such as those laid out by other cities in order to address inequities in the rental housing market.

one plus bedroom
 we are looking for mature tenant/s
 one year lease
 we require references (rental) and background check (\$40.00) for any prospective tenants.
 we offer a decent neighborhood with a combination of homeowners and rental units.
 rate is for 1-2 people
 coin op laundry on site
 smoke free housing
 n/ pets
 near bus line
 no parties
 available January 2020
 landlord lives near by
 landlord can provide references from previous renters.
 \$800 /month includes electric
 Tenant contributes to water gas and sewage costs October through May (average \$65/month)
 Prefer 2 years of rental history

No Section 8

Duluth Craigslist January 21, 2020

³² <https://www.thebalancesmb.com/renting-to-section-8-tenants-disadvantages-2124975>
³³ <http://www.minneapolismn.gov/news/WCMSP-196366>



no smoking

off-street parking

Please read entire ad before calling...

YouTube virtual tour: <https://youtu.be/Llh1BJyX9-E>

Available starting NOW or February 1st.

Located near Fitgers, Sir Ben's, Essentia, St Luke's, with quick access to the Lakewalk!

This 2nd floor apartment features great lake view, big windows, updated electric & plumbing, and off-street parking!

We pay the heat, water, sewer & garbage. Tenant responsible for electric.

Shorter term lease available for additional charge.

Sorry, NO PETS.

Must be able to pass BACKGROUND CHECK (no felonies or evictions in past 7 yrs), CREDIT CHECK, and meet INCOME REQUIREMENTS of 2 1/2 times the rent (or have cosigner).

WE ARE NOT ACCEPTING SECTION 8.

Duluth Craigslist January 21, 2020

Criminal Record

Across the United States one can find disproportionate arrests, convictions, and sentencing rates for BIPOC compared to white populations due to many systemic issues including but not limited to implicit bias in the criminal justice system.³⁴ The State of Minnesota is no different. White people are underrepresented and people of color are overrepresented in prisons and jails in MN compared to the state's population.³⁵ The prison population in Minnesota has gotten larger by the thousands since the 1980s indicating a significant number of people who have been touched in some way by the criminal justice system. This means that BIPOC disproportionately have criminal histories and that blanket denial for rental housing based solely on criminal record is a race based discrimination issue, so therefore a fair housing issue. Furthermore, HUD guidance suggests that having a blanket criminal history policy could be a violation of the Fair Housing act because "an arrest is not a reliable basis upon which to assess the potential risk to residents or property."³⁶ HUD suggests using a policy that evaluates criminal history on a case-by-case basis in addition to justifying tenant denial by assessing the correlation between an individual's criminal history and their risk to residents or property. Mandating a justification for a denial based on criminal history would create greater landlord accountability to make comprehensive, non-biased leasing decisions, and lead to a more transparent process for potential tenants.

Cities like Portland, OR are addressing this issue by implementing a renter protection ordinance. This ordinance includes provisions to address the tenant screening process by laying out what they call a low-barrier review. This low-barrier review would not automatically deny leasing based on criminal history, credit, or rental history; rather an individual review is completed before a denial is made to make it a more comprehensive review of the prospective tenant. There are other non-legislative strategies to address the effects of blanket criminal

³⁴ <https://www.sentencingproject.org/publications/un-report-on-racial-disparities/>

³⁵ <https://www.prisonpolicy.org/profiles/MN.html>

³⁶ <https://nlihc.org/resource/hud-issues-bold-fair-housing-guidance-use-criminal-records>

screening criteria such as broad information campaigns or educational classes. Many of these options have not been explored by the City of Duluth but should be further researched.

Community Experience

As part of the Consolidated Planning community outreach process, the Planning and Development Division staff used multiple outreach strategies to engage community members and the organizations that serve our community. An online Community Needs Assessment survey was available for about three weeks in spring 2019. Division staff also consulted nonprofits and service providers who work on issues of healthcare, housing, homelessness, and education, and other community issues.

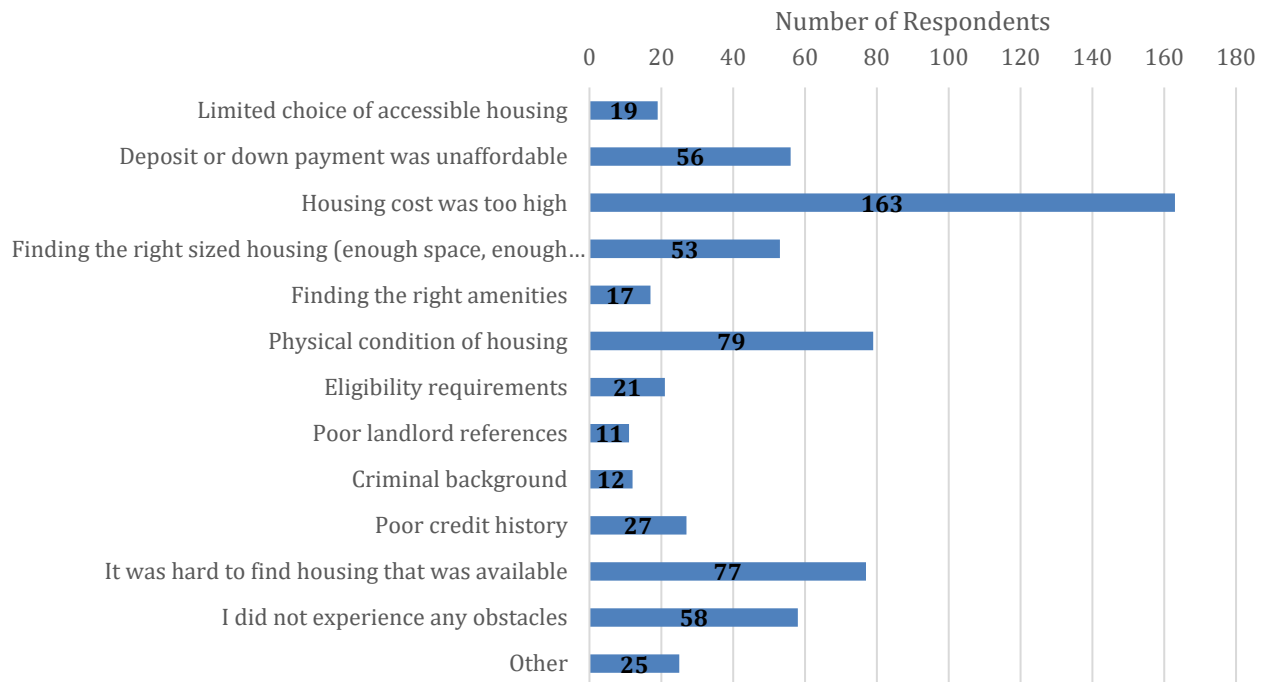
In focus groups with nonprofits and services providers, focus group participants identified several housing barriers related to fair housing choice and protected classes including:

- Criminal history/re-entry issues
- Mental health
- Lack of accessible housing
- General availability and supply of affordable housing
- Transportation to housing (i.e. access to transit)
- Discrimination
- Unsafe housing conditions of some rental housing

The City conducted an online survey asking questions about community needs and fair housing issues. Over 300 community members responded to the survey. Many survey respondents identified issues related to fair housing and protected classes when asked what was the biggest obstacle they had faced the last time they were looking for housing.

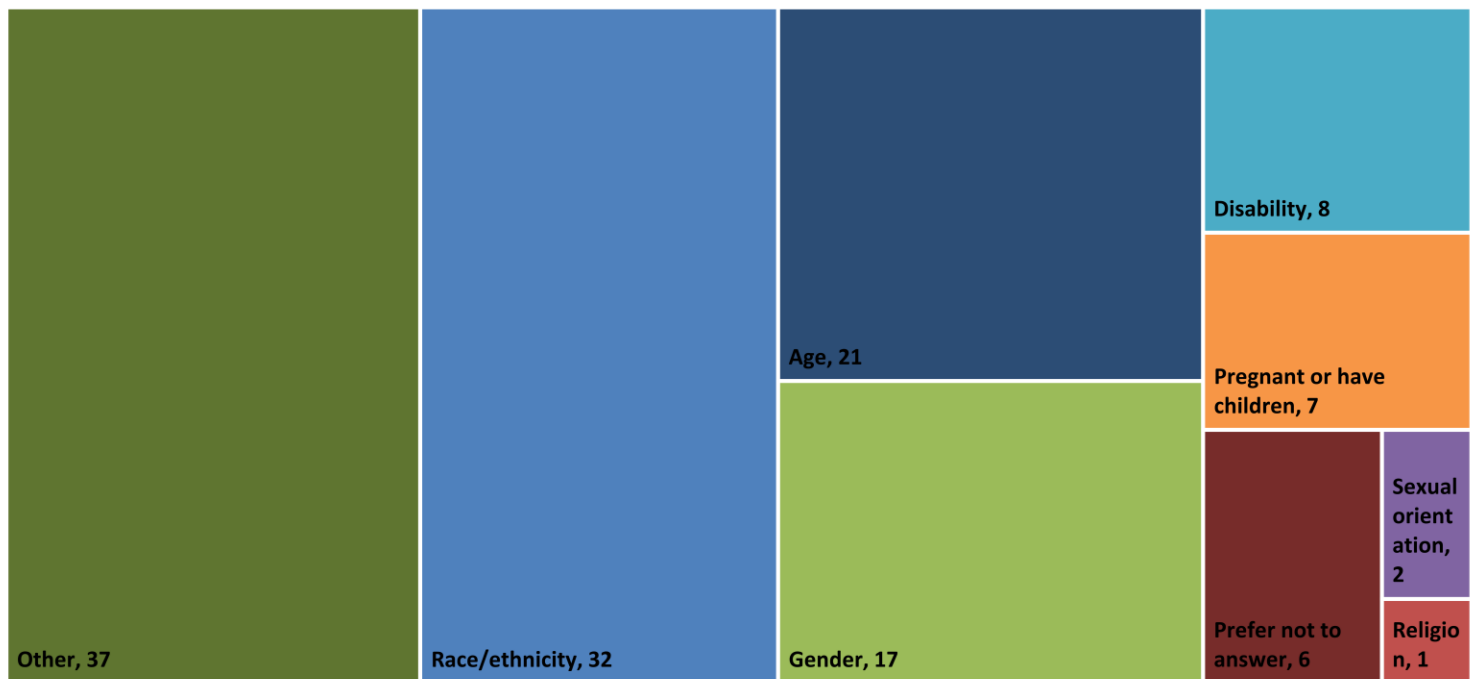
Out of more than 300 respondents to the online survey, 26% said that the last time they were searching for housing, they think they were treated differently than other people looking for housing. Respondents who felt they were treated differently were asked a follow-up question about why they thought they were treated differently. Respondents were shown a list of protected classes and asked to pick all that applied. Of those respondents who felt they were treated differently, 38% said they thought it was due to race, 25% thought it was due to age, and 20% thought it was due to gender.

What was the biggest obstacle to obtaining housing the last time you were searching for housing? Check all that apply:



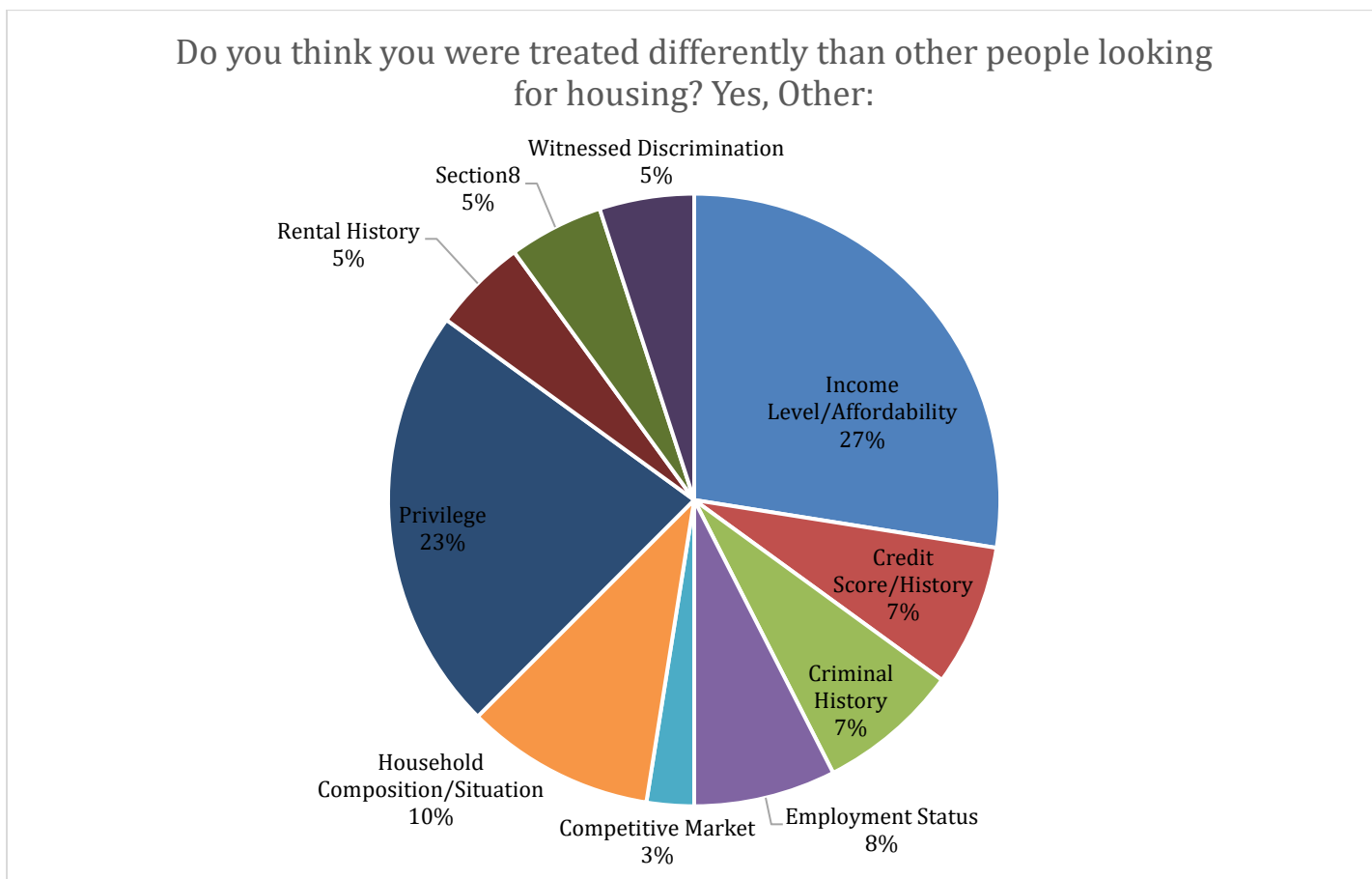
City of Duluth Community Needs Survey 2019

Do you think you were treated differently than other people looking for housing? Yes, because of:



City of Duluth Community Needs Survey 2019

Nearly half of those respondents indicated that they felt they were treated differently due to a variety of other factors including criminal history and Section 8. The breakdown of open-ended responses for those who chose the “other” option is shown below.



City of Duluth Community Needs Survey 2019

2015 Analysis of Impediments to Fair Housing

The 2015 AI produced a five-year Fair Housing Plan that identified two impediments to fair housing and five strategies to address them. Below the impediments and strategies are listed along with any actions that were taken in the past five years to implement the strategies.

Impediment 1: Lack of knowledge of fair housing rights

Strategy 1A: Rental license flier and marketing

- This strategy was not directly addressed.

Strategy 1B: Required training to permanent supportive and transitional housing providers

- On Tuesday, July 19, 2016 representatives from HUD came to Duluth to provide training to local service providers, landlords, and residents on the Americans with Disabilities Act (ADA) and Fair Housing Act. Topics for the training included an overview of Civil Rights protections in housing, Americans with Disabilities Act, Fair Housing Act, protection for those with disabilities including issues related to animals and reasonable

accommodations, marketing and tenant selection including advertising, occupancy standards, and criminal background checks, the fair housing complaint process, disparate impact, and Affirmatively Furthering Fair Housing. Staff from the Duluth HRA, public service providers, housing and homelessness service providers, and Human Rights Officer for the City attended the training.

Strategy 1C: Require permanent supportive and transitional housing providers to educate tenants on reasonable accommodations and fair housing rights

- The City provided CDBG and city funding to the Tenant Landlord Connection (TLC). The TLC helps ensure stable rental housing exists by educating existing and potential landlords and tenants regarding rights and responsibilities, mediating disputes between landlords and tenants, and connecting reputable tenants and landlords to facilitate healthy, long-term rental tenancy. The TLC provides education to landlords and tenants including landlord training/rental licensing class, tenant/landlord law and legal forms, Fair Housing training and education, Ready to Rent classes for hopeful tenants without a positive rental history, and classes for high school students. The Duluth HRA works in coordination with the TLC by referring Section 8 recipients to Ready to Rent classes.

Impediment 2: Insufficient data to support enforcement

Strategy 2A: Collect information from housing providers about housing discrimination complaints and provide to Human Rights Officer to help guide strategic planning and coordination

- This strategy was not directly addressed.

Strategy 2B: Work with Police, Life Safety, and the Human Rights Office to identify gaps in enforcement

- In 2016, the City of Duluth updated its Human Rights Ordinance leading to the Human Rights Office and the Human Rights Commission working to develop an improved protocol for how to handle and process complaints and to make filing a complaint more accessible and less intimidating. Over the next two years, as a direct result of the ordinance update, the Human Rights Office worked with the Police Department as the Police revised their strategy for receiving complaints, and what happens and who gets informed after a complaint is made.

Three of the five strategies from the 2015 Fair Housing Plan were directly addressed. Although two strategies were not directly addressed, the City was able to make progress towards reducing both of the identified impediments to fair housing. As the Human Rights Office continues to refine the implementation of the updated Human Rights Ordinance and work with community partners on fair housing and discrimination reporting and enforcement, we expect that these impediments related to fair housing education and enforcement will continue to be addressed and reduced in the coming years.

Chapter 6: 2020-2024 Fair Housing Plan

Using the trends, data, and our knowledge of historical and existing policies and practices discussed in the full 2020 Analysis of Impediments to Fair Housing report, the City of Duluth has identified four impediments to fair housing choice to focus on for the next five years. The goal of this Fair Housing Plan is to address the most pressing fair housing issues with both short and long term strategies. This Plan focuses on building a more equitable community in the face of a legacy of policies and practices that have created deep inequities in our city, including segregation and racialized poverty.

Exclusionary Section 8 Policies

Of the 1,309 households using Section 8 HCV in the private rental market in 2018, 24% of householders were Black, 10% of householders were Indigenous, 69% of householders were female, and 50% of householders had a disability. The citywide population of Duluth is 3% Black, 2% Indigenous, 51% female, and 14% people with disabilities. The utilization rate for Section 8 Housing Choice Vouchers issued in 2018 was approximately 54%, indicating that there can be significant difficulty in securing housing after receiving a Section 8 voucher. Therefore, private rental market policies that advertise no Section 8 or that do not allow Section 8 have a disproportionately negative effect on multiple protected classes.

Impediment 1: Exclusionary rental housing practices and policies directed at Section 8 Housing Choice Voucher holder

Strategy 1.1: Conduct outreach to landlords to gather information on what they see as deterrents to renting out to Section 8 Housing Choice Voucher holders and work with the Housing and Redevelopment Authority (HRA) to raise landlord awareness about Section 8 vouchers.

Strategy 1.2: Collaborate with local partners to create and expand educational programs and incentives for landlords that address Section 8 Housing Choice voucher holder stereotypes, administrative barriers, and advertising practices.

Strategy 1.3: Produce and endorse model language that can be used by landlords in advertising or leasing documents inclusive to Section 8 Housing Choice Voucher holders.

Strategy 1.4: Consider implementing a Section 8 protection ordinance or something similar that prohibits landlords from advertising “no Section 8” or denying prospective tenants solely on the basis of receiving public assistance through Section 8. Review Minneapolis, MN and Portland, OR ordinances for guidance.

Exclusionary Criminal Background Policies

White people are underrepresented and BIPOC are overrepresented in prisons and jails in MN compared to the state's population³⁷. There is significant research showing that arrest and incarceration rates are disproportionately higher for BIPOC³⁸. This means that BIPOC disproportionately have criminal histories, so blanket criminal histories policies for tenant selection have a disproportionately negative effect on protected classes. HUD guidance suggests that having a blanket criminal history policy could be a violation of the Fair Housing act because "an arrest is not a reliable basis upon which to assess the potential risk to residents or property". HUD suggests using a policy that evaluates criminal history on a case-by-case basis in addition to justifying tenant denial by assessing the correlation between an individual's criminal history and their risk to residents or property. In short, strategies to address this impediment aim to create fewer housing barriers for people with criminal histories.

Impediment 2: Exclusionary rental housing practices and policies directed at persons with criminal histories

Strategy 2.1: Create a criminal history rental-housing guide that summarizes best practices in leasing to persons with criminal history and provide landlords with language to use for applications and leases.

Strategy 2.2: Collaborate with local partners to create and expand educational programs and incentives for landlords. Build upon existing programs that address eviction prevention training and invest in funds that incentivize apprehensive landlords who wouldn't normally lease out to tenants with criminal backgrounds.

Strategy 2.3: Collaborate with partners, including local landlords, to develop a unified background check that will streamline tenant application processes and eliminate duplicate fees for background checks.

Strategy 2.4: Create an educational marketing campaign, similar to "ban the box," that supports best practices in leasing to people with criminal histories.

³⁷ <https://www.prisonpolicy.org/profiles/MN.html>

³⁸ <https://www.sentencingproject.org/publications/un-report-on-racial-disparities/>

Involuntary Displacement

The key difference between neighborhood revitalization and gentrification is that gentrification causes involuntary displacement of residents and community-serving small businesses. Investments in neighborhoods that improve communities are a good thing, but these investments should be paired with anti-displacement strategies to ensure that everyone in the community benefits from revitalization. Research regarding involuntary displacement shows that certain demographic characteristics, such as being a renter rather than a homeowner or having a lower income make it more difficult for individuals to resist displacement. In Duluth, vulnerability to displacement disproportionately affects protected classes including BIPOC and people with disabilities. In Duluth 40% of all households rent, but BIPOC households are disproportionately renters (71%) rather than owners (29%). The most recent American Community Survey in Duluth estimates median annual earnings for people with a disability at \$9,780, compared to \$21,994 for people without a disability. The ACS estimates per capita annual income for Duluth's white population at \$26,346, \$8,994 for the Black population, and \$10,696 for the Indigenous population. The distribution of affordable housing, including in neighborhoods where historic displacement has occurred or is in its early stages, is crucial in addressing displacement and providing fair housing choice.

Impediment 3: Involuntary displacement and limited housing choice caused by gentrification

Strategy 3.1: Commit to monitoring and tracking neighborhood changes at regular intervals in order to identify the location of populations who are vulnerable to displacement, neighborhoods that are prone to gentrification, and neighborhoods that are undergoing gentrification.

Strategy 3.2: Create anti-displacement strategies through public engagement and research addressing displacement of protected classes in Duluth and codify anti-displacement strategies at the city level, for example by integrating them into the Community Development funding application and other processes.

Strategy 3.3: Disseminate research and guidance on anti-displacement strategies to local partners.

Strategy 3.4: Develop a framework that considers housing choice along with the transportation and service needs of the expected/predicted tenants when siting new

Built Environment

Conservative land use and zoning policies contribute to the built environment by creating a tradition of exclusionary development patterns while restricting density, location, and availability for new residential development. This limits housing supply and options, increasing overall housing costs, disproportionately affecting low-income populations and protected classes. In Duluth 44% of housing units were built before 1939. The older housing stock lends itself to what is called “naturally occurring affordable housing,” essentially housing that is cheaper because it is lower quality. As discussed above, some protected classes are disproportionately lower income, so deferred maintenance and health concerns created by substandard housing, such as lead paint and mold, have the potential to disproportionately affect protected classes. Some older and now substandard homes also have the potential to affect those with disabilities because they were not built for accessibility and pose high, unachievable costs to retrofit for ADA compliance.

Impediment 4: Policies and physical limitations in the built environment

Strategy 4.1: Conduct a feasibility study that investigates creative tools to incentivize or require some affordable and/or accessible units in new housing developments.

Strategy 4.2: Continue to make changes to the City’s Unified Development Code that address outdated land use and zoning policies, which in turn affect density and mixed income neighborhoods and residential developments.

Strategy 4.3: Explore an alternative rental-licensing program, such as a targeted or tiered system, that addresses rental housing quality, regulatory body and property owner accountability.

Strategy 4.4: Support new or existing rehabilitation programs that focus on healthy homes and retrofitting for ADA accessibility. Implement these programs in a variety of neighborhoods throughout Duluth.

Fair Housing Plan Implementation

The next few pages offer a roadmap for implementing the strategies discussed above. The first table lists the entities who will help implement the strategies as well as their anticipated roles at each step in the process. Following that table, each of the four impediments is listed showing the timing and steps for implementing each strategy. The implementation plan is intentionally broad to ensure that measured progress is made throughout the next five years, but to also leave room for flexibility. The timeline for strategy implementation aligns with the City’s HUD funding fiscal years so that progress in implementation can be reported on in annual Action Plans.

Collaborators	Roles				
	Listen and Provide Input	Research and Analyze	Develop	Educate	Evaluate
City of Duluth - Planning & Economic Development Department	<p>Convene meetings and build or maintain positive relationships with partners</p> <p>Collect quantitative data (i.e. surveys) and qualitative data (i.e. conversations and focus groups)</p> <p>Share experiences and provide input to help develop policies, practices, and written materials</p>	<p>Conduct research, review best practices and case studies</p> <p>Analyze and distill input and data</p>	<p>Develop written resources such as guides, one-pagers, and reports</p> <p>Develop language and mechanisms for policies and practices</p>	<p>Disseminate paper educational materials and raise awareness</p>	<p>Evaluate, track, and monitor outcomes and effectiveness</p> <p>Collect and track reports of non-compliance</p>
City of Duluth - Life Safety Division	<p>Share experiences and provide input to help develop policies, practices, and written materials</p> <p>Utilize relationships/points of contact with landlords to elicit feedback and input</p>		<p>Inform the development of deliverables and provide feedback on draft deliverables</p>	<p>Disseminate paper educational materials in rental licensing correspondence and raise awareness during rental inspections</p>	<p>Collect and track reports of non-compliance</p>
City of Duluth - Human Rights Office	<p>Share experiences and provide input to help develop policies, practices, and written materials</p> <p>Relationship and trust building, connection to community</p>		<p>Inform the development of deliverables and provide feedback on draft deliverables</p>	<p>Disseminate paper educational materials and raise awareness</p>	<p>Collect and track reports of non-compliance</p>
Housing and Redevelopment Authority - Section 8 Voucher Program	<p>Share experiences and provide input to help develop policies, practices, and written materials</p> <p>Relationships with landlords</p> <p>Collaboration with community orgs</p> <p>Convene meetings</p>		<p>Inform the development of deliverables and provide feedback on draft deliverables</p>	<p>Provide education and training</p>	<p>Evaluate, track, and monitor outcomes and effectiveness</p> <p>Collect and track reports of non-compliance</p>
Duluth Landlord Association	<p>Share experiences and provide input to help develop policies, practices, and written materials</p>		<p>Inform the development of deliverables and provide feedback on draft deliverables</p>	<p>Using network to raise awareness</p>	
Community members (focus on protected classes)	<p>Share experiences and provide input to help develop policies, practices, and written materials</p>		<p>Inform the development of deliverables and provide feedback on draft deliverables</p>		
Community organizations that have relationships with landlords (Landlord Incentive Program, Tenant Landlord Connection, Affordable Housing Coalition, etc.)	<p>Share experiences and provide input to help develop policies, practices, and written materials</p> <p>Utilize relationships with landlords to elicit feedback and input</p> <p>Convene meetings</p>		<p>Inform the development of deliverables and provide feedback on draft deliverables</p>	<p>Utilize relationships with landlords to raise awareness</p> <p>Provide education and training</p>	<p>Evaluate, track, and monitor outcomes and effectiveness</p> <p>Collect and track reports of non-compliance</p>

Impediment 1: Exclusionary rental housing practices and policies directed at Section 8 Housing Choice Voucher holders

Strategy	Phase 1 April 1, 2020 - March 31, 2022	Phase 2 April 1, 2022 - March 31, 2024	Phase 3 April 1, 2024 - March 31, 2025
<p><u>Strategy 1.1</u> Conduct outreach to landlords to gather information on what they see as deterrents to renting out to Section 8 Housing Choice Voucher holders and work with the Housing and Redevelopment Authority (HRA) to raise landlord awareness about Section 8 vouchers.</p>	<p>Listen and Provide Input Research and Analyze Develop</p>	<p>Educate Evaluate</p>	<p>Educate Evaluate</p>
<p><u>Strategy 1.2</u> Collaborate with local partners to create and expand educational programs and incentives for landlords that address Section 8 Housing Choice voucher holder stereotypes, administrative barriers, and advertising practices.</p>	<p>Listen and Provide Input Research and Analyze Develop</p>	<p>Educate Evaluate</p>	<p>Educate Evaluate</p>
<p><u>Strategy 1.3</u> Produce and endorse model language that can be used by landlords in advertising or leasing documents inclusive to Section 8 Housing Choice Voucher holders.</p>		<p>Listen and Provide Input Research and Analyze Develop</p>	<p>Educate Evaluate</p>
<p><u>Strategy 1.4</u> Consider the feasibility of a Section 8 protection ordinance that prohibits landlords from advertising “no Section 8” or denying prospective tenants solely on the basis of receiving public assistance through Section 8. Review Minneapolis, MN and Portland, OR ordinances for guidance.</p>		<p>Listen and Provide Input Research and Analyze Develop</p>	<p>Educate Evaluate</p>

Impediment 2: Exclusionary rental housing practices and policies directed at persons with criminal histories

Strategy	Phase 1 April 1, 2020 - March 31, 2022	Phase 2 April 1, 2022 - March 31, 2024	Phase 3 April 1, 2024 - March 31, 2025
<p><u>Strategy 2.1</u> Create a criminal history rental-housing guide that summarizes best practices in leasing to persons with criminal history and provide landlords with language to use for applications and leases.</p>	<p>Listen and Provide Input Research and Analyze Develop</p>	<p>Educate Evaluate</p>	<p>Educate Evaluate</p>
<p><u>Strategy 2.2</u> Collaborate with local partners to create and expand educational programs and incentives for landlords. Build upon existing programs that address eviction prevention training and invest in funds that incentivize apprehensive landlords who wouldn't normally lease out to tenants with criminal backgrounds.</p>		<p>Listen and Provide Input Research and Analyze Develop</p>	<p>Educate Evaluate</p>
<p><u>Strategy 2.3</u> Collaborate with partners, including local landlords, to develop a unified background check that will streamline tenant application processes and eliminate duplicate fees for background checks.</p>		<p>Listen and Provide Input Research and Analyze Develop</p>	<p>Educate Evaluate</p>
<p><u>Strategy 2.4</u> Create an educational marketing campaign, similar to "ban the box," that supports best practices in leasing to people with criminal histories.</p>	<p>Listen and Provide Input Research and Analyze Develop</p>	<p>Educate Evaluate</p>	<p>Educate Evaluate</p>

Impediment 3: Involuntary displacement and limited housing choice caused by gentrification

Strategy	Phase 1 April 1, 2020 - March 31, 2022	Phase 2 April 1, 2022 - March 31, 2024	Phase 3 April 1, 2024 - March 31, 2025
<p><u>Strategy 3.1</u> Commit to monitoring and tracking neighborhood changes at regular intervals in order to identify the location of populations who are vulnerable to displacement, neighborhoods that are prone to gentrification, and neighborhoods that are undergoing gentrification.</p>	<p>Research and Analyze Develop Evaluate</p>	<p>Research and Analyze Develop Evaluate</p>	<p>Research and Analyze Develop Evaluate</p>
<p><u>Strategy 3.2</u> Create anti-displacement strategies through public engagement and research addressing displacement of protected classes in Duluth and codify anti-displacement strategies at the city level, for example by integrating them into the Community Development funding application and other processes.</p>	<p>Listen and Provide Input Research and Analyze</p>	<p>Develop Educate</p>	<p>Educate Evaluate</p>
<p><u>Strategy 3.3</u> Disseminate research and guidance on anti-displacement strategies to local partners.</p>	<p>Listen and Provide Input Research and Analyze Develop</p>	<p>Educate Evaluate</p>	<p>Educate Evaluate</p>
<p><u>Strategy 3.4</u> Develop a framework that considers housing choice along with the transportation and service needs of the expected/predicted tenants when siting new affordable housing developments including projects funded by the Community Development Funding Program and tax credit projects with affordability components.</p>	<p>Listen and Provide Input Research and Analyze</p>	<p>Develop Educate</p>	<p>Educate Evaluate</p>

Impediment 4: Policies and physical limitations in the built environment

Strategy	Phase 1 April 1, 2020 - March 31, 2022	Phase 2 April 1, 2022 - March 31, 2024	Phase 3 April 1, 2024 - March 31, 2025
<p><u>Strategy 4.1</u> Conduct a feasibility study that investigates creative tools to incentivize or require some affordable and/or accessible units in new housing developments.</p>		<p>Listen and Provide Input Research and Analyze Develop</p>	<p>Educate Evaluate</p>
<p><u>Strategy 4.2</u> Continue to make changes to the City’s Unified Development Code that address outdated land use and zoning policies, which in turn affect density and mixed income neighborhoods and residential developments.</p>	<p>Listen and Provide Input Research and Analyze</p>	<p>Listen and Provide Input Research and Analyze Develop</p>	<p>Develop</p>
<p><u>Strategy 4.3</u> Explore an alternative rental-licensing program, such as a targeted or tiered system, that addresses rental housing quality, regulatory body and property owner accountability.</p>	<p>Listen and Provide Input Research and Analyze</p>	<p>Listen and Provide Input Research and Analyze Develop</p>	<p>Develop Educate Evaluate</p>
<p><u>Strategy 4.4</u> Support new or existing rehabilitation programs that focus on healthy homes and retrofitting for ADA accessibility. Implement these programs in a variety of neighborhoods throughout Duluth.</p>	<p>Educate Evaluate</p>	<p>Educate Evaluate</p>	<p>Educate Evaluate</p>

Data and Methodology

Data from the US Census Bureau

Decennial Census

Census data used in this report are actual counts of the entire population.

American Community Survey 5-year estimates

ACS data used in this report are 5-year estimates based on annual surveys sent out to a sample of the population. When referring to ACS data in this report, we often mention just one year as shorthand. The year stated is the most recent year in the 5-year period so when we say 2018 ACS data it is an estimate based on the data from 2014-2018.

Appendix

The following pages contain data tables showing all of the 2018 and 2017 ACS data used in this report for the city and neighborhoods.

Duluth, MN		
American Community Survey (ACS) 5-year estimates 2014-2018	2018	
	#	%
Population	86,004	
Race & Ethnicity		
White	77,255	90%
People of Color	8,749	10%
Black or African American	2,083	2%
American Indian and Alaska Native	1,550	2%
Asian	1,399	2%
Native Hawaiian and Other Pacific Islander	36	0%
Some other race	348	0%
Two or more races	3,333	4%
White and Black or African American	930	
White and American Indian and Alaska Native	1,186	
White and Asian	664	
Black or African American and American Indian and Alaska Native	75	
Race alone or in combination with one or more other races		
White	80,454	94%
Black or African American	3,316	4%
American Indian and Alaska Native	3,048	4%
Asian	2,179	3%
Native Hawaiian and Other Pacific Islander	104	0%
Some other race	507	1%
Hispanic or Latino	1,981	2%
Not Hispanic or Latino	84,023	98%
Age		
Under 18 years	15,478	18%
18-64 years old	56,871	66%
65 years and over	13,655	16%
Poverty		
Total Population for whom poverty status is determined	80,533	
With income below poverty level	15,520	19%
Disability		
Total civilian noninstitutionalized population for which disability status is determined	84,534	
With a disability	11,403	13.5%
Sex		
Male	42,425	49%
Female	43,579	51%

Housing Units & Households		
Total Housing Units	38,485	
Built 2014 or later	308	1%
Built 2010 to 2013	329	1%
Built 2000 to 2009	2,358	6%
Built 1990 to 1999	2,144	6%
Built 1980 to 1989	1,873	5%
Built 1970 to 1979	3,867	10%
Built 1960 to 1969	2,869	7%
Built 1950 to 1959	5,114	13%
Built 1940 to 1949	2,702	7%
Built 1939 or earlier	16,921	44%
Vacant Housing Units	2,446	6%
Occupied housing units	36,039	94%
Family households (families)	18,488	51%
With own children under 18 years	7,932	22%
Married-couple family	13,634	38%
With own children under 18 years	4,860	13%
Male householder, no wife present	1,347	4%
With own children under 18 years	823	2%
Female householder, no husband present	3,507	10%
With own children under 18 years	2,249	6%
Nonfamily households	17,551	49%
Households with individuals under 18 years	8,541	24%
Tenure		
Owner-occupied housing units	21,727	60%
Renter-occupied housing units	14,312	40%
Median Household Income (MHI) in 2018 dollars		
All households	\$49,441	
Owner Occupied	\$68,388	
Renter Occupied	\$27,875	
Race of Householder		
White	33,276	92%
MHI	\$51,681	
Owner occupied	20,934	63%
Renter occupied	12,467	37%
POC	2,763	8%
MHI	\$26,704	
Owner occupied	793	29%
Renter occupied	1,970	71%
Black or African American	688	2%
MHI	\$21,352	
Owner occupied	118	17%
Renter occupied	570	83%
American Indian and Alaska Native	749	2%
MHI	\$25,352	
Owner occupied	149	20%
Renter occupied	600	80%
Asian	442	1%
MHI	\$35,000	
Owner occupied	148	33%
Renter occupied	294	67%
Native Hawaiian and Other Pacific Islander	0	0%
MHI		
Owner occupied	0	0%
Renter occupied	0	0%
Some other race	57	0%
MHI	<i>data not available</i>	
Owner occupied	23	40%
Renter occupied	34	60%
Two or more races	827	2%
MHI	\$27,946	
Owner occupied	355	43%
Renter occupied	472	57%
Housing Costs		
Median selected monthly owner costs as a percentage of household income		18%
Median gross rent as a percentage of household income		29%

Duluth Neighborhood Demographics 2017: <https://www.mncompass.org/profiles/custom>

	Central Hillside/Park Point		Congdon		Duluth Heights/Kenwood		East Hillside		Lakeside/Lester Park	
Demographics	#	%	#	%	#	%	#	%	#	%
Population										
Total Population	8,261	100%	9,164	100%	11,111	100%	7,543	100%	9,153	100%
Gender										
Male	4,318	52%	4,709	51%	5,041	45%	3,658	49%	4,438	49%
Female	3,944	48%	4,455	49%	6,070	55%	3,884	52%	4,715	52%
Age Ranges										
Under 5 years	342	4%	487	5%	261	2%	372	5%	612	7%
5-9 years	313	4%	451	5%	171	2%	311	4%	544	6%
10-14 years	334	4%	460	5%	379	3%	201	3%	442	5%
15-17 years	135	2%	189	2%	231	2%	125	2%	382	4%
18-24 years	1,307	16%	2,468	27%	6,045	54%	2,466	33%	1,004	11%
25-34 years	1,345	16%	1,339	15%	608	6%	1,198	16%	917	10%
35-44 years	861	10%	822	9%	594	5%	781	10%	1,148	13%
45-54 years	949	12%	915	10%	712	6%	609	8%	1,306	14%
55-64 years	1,297	16%	1,027	11%	757	7%	737	10%	1,263	14%
65-74 years	724	9%	660	7%	604	5%	379	5%	703	8%
75-84 years	463	6%	258	3%	401	4%	179	2%	581	6%
85 years and older	190	2%			347	3%	186	3%	253	3%
17 years and younger	1,125	14%	1,588	17%	1,043	9%	1,008	13%	1,980	22%
18-64 years	5,759	70%	6,572	72%	8,716	78%	5,791	77%	5,637	62%
65 years and older	1,377	17%	1,005	11%	1,352	12%	744	10%	1,537	17%
Race and Ethnicity										
White	6,313	76%	8,186	89%	9,893	89%	6,355	84%	8,633	94%
Of Color	1,948	24%	978	11%	1,218	11%	1,188	16%	520	6%
Poverty										
All people for whom poverty status is determined	7,976	100%	9,128	100%	7,119	100%	7,507	100%	9,030	100%
With income below poverty	2,864	36%	1,946	21%	2,009	28%	2,682	36%	679	8%
With income 100-149% of poverty	863	11%	823	9%	374	5%	747	10%	700	8%
With income 150-199% of poverty	819	10%	546	6%	446	6%	805	11%	659	7%
With income 200% of poverty or higher	3,430	43%	5,814	64%	4,289	60%	3,273	44%	6,991	77%
17 years and younger (percent of people under age 18)	488	47%	215	14%			330	34%		
18-64 (percent of people 18-64)	2,135	44%	1,691	29%	1,842	43%	2,220	44%		
65 years and older (percent of people age 65+)	240	19%			130	11%	133	18%		
17 years and younger (percent of people under age 18)	488	47%	215	14%			330	34%		
18-24 (percent of people age 18-24)	718	55%	1,288	52%	1,661	72%	1,490	60%		
25-34 (percent of people age 25-34)	405	31%	191	14%	74	14%	245	20%		
35-44 (percent of people age 35-44)	198	24%	75	9%	42	7%	157	20%		
45-54 (percent of people age 45-54)	395	42%	65	7%			163	27%		
55-64 (percent of people age 55-64)	419	33%	72	7%			165	22%		
65 years and older (percent of people age 65+)	240	19%			130	11%	133	18%		
Other Characteristics										
Foreign-born residents	438	5%	336	4%	511	5%	433	6%	217	2%
Total population for whom disability status is determined	8,031	100%	9,150	100%	10,936	100%	7,532	100%	9,035	100%
Population with a disability	1,677	21%	777	9%	828	8%	1,054	14%	904	10%

	Lincoln Park		Piedmont		West Duluth		Western River Communities		Woodland	
Demographics	#	%	#	%	#	%	#	%	#	%
Population										
Total Population	5,843	100%	10,735	100%	10,920	100%	6,739	100%	6,449	100%
Gender										
Male	2,859	49%	5,547	52%	5,354	49%	3,454	51%	3,296	51%
Female	2,984	51%	5,188	48%	5,567	51%	3,285	49%	3,153	49%
Age Ranges										
Under 5 years	364	6%	574	5%	690	6%	363	5%	380	6%
5-9 years	425	7%	413	4%	493	5%	485	7%	342	5%
10-14 years	470	8%	591	6%	768	7%	382	6%	416	6%
15-17 years	194	3%	324	3%	391	4%	256	4%	326	5%
18-24 years	649	11%	996	9%	1,006	9%	484	7%	594	9%
25-34 years	1,061	18%	1,649	15%	1,441	13%	857	13%	820	13%
35-44 years	757	13%	1,056	10%	1,446	13%	878	13%	756	12%
45-54 years	784	13%	998	9%	1,613	15%	922	14%	938	15%
55-64 years	644	11%	1,684	16%	1,337	12%	1,027	15%	855	13%
65-74 years	344	6%	1,069	10%	1,021	9%	613	9%	615	10%
75-84 years	79	1%	883	8%	492	5%	342	5%	241	4%
85 years and older	72	1%	500	5%	223	2%	130	2%	167	3%
17 years and younger	1,453	25%	1,902	18%	2,342	21%	1,485	22%	1,463	23%
18-64 years	3,895	67%	6,383	60%	6,843	63%	4,168	62%	3,962	61%
65 years and older	495	9%	2,451	23%	1,735	16%	1,086	16%	1,023	16%
Race and Ethnicity										
White	4,826	83%	9,604	90%	9,832	90%	6,195	92%	5,976	93%
Of Color	1,017	17%	1,132	11%	1,088	10%	544	8%	473	7%
Poverty										
All people for whom poverty status is determined	5,778	100%	9,693	100%	10,788	100%	6,562	100%	6,341	100%
With income below poverty	1,510	26%	1,044	11%	1,688	16%	1,131	17%	576	9%
With income 100-149% of poverty	924	16%	562	6%	1,247	12%	623	10%	358	6%
With income 150-199% of poverty	623	11%	751	8%	921	9%	787	12%	319	5%
With income 200% of poverty or higher	2,721	47%	7,335	76%	6,933	64%	4,021	61%	5,088	80%
17 years and younger (percent of people under age 18)	364	26%	293	16%	566	26%	384	27%		
18-64 (percent of people 18-64)	1,072	34%	577	12%	916	17%	659	20%	482	15%
65 years and older (percent of people age 65+)	74	15%	174	8%	206	12%	88	9%		
17 years and younger (percent of people under age 18)	364	26%	293	16%	566	26%	384	27%		
18-24 (percent of people age 18-24)	327	51%	302	31%	222	22%	76	16%	256	44%
25-34 (percent of people age 25-34)	206	19%			150	10%	169	20%	53	6%
35-44 (percent of people age 35-44)	190	25%			235	16%	160	18%		
45-54 (percent of people age 45-54)	155	20%			172	11%	126	14%	102	11%
55-64 (percent of people age 55-64)	194	30%			137	10%	127	12%		
65 years and older (percent of people age 65+)	74	15%	174	8%	206	12%	88	9%		
Other Characteristics										
Foreign-born residents	214	4%	277	3%	248	2%	144	2%	168	3%
Total population for whom disability status is determined	5,765	100%	9,712	100%	10,886	100%	6,632	100%	6,338	100%
Population with a disability	1,102	19%	1,192	12%	1,787	16%	1,236	19%	549	9%

	Central Hillside/Park Point		Congdon		Duluth Heights/Kenwood		East Hillside		Lakeside/Lester Park	
Housing Units and Households	#	%	#	%	#	%	#	%	#	%
Housing Units										
Total housing units	5,109		3,930		2,907		3,813		3,911	
Vacant housing units (seasonal units included)	566	11%	224	6%	149	5%	317	8%	219	6%
Occupied housing units	4,544	89%	3,706	94%	2,758	95%	3,496	92%	3,692	94%
Year built										
2000 or later	562	11%	192	5%	356	12%	66	2%	392	10%
1970-1999	1,382	27%	422	11%	658	23%	647	17%	530	14%
1940-1969	816	16%	1,103	28%	1,104	38%	840	22%	1,642	42%
1939 or earlier	2,349	46%	2,214	56%	790	27%	2,260	59%	1,348	35%
Households										
Total Households	4,599		3,706		2,771		3,489		3,690	
Median household income	\$ 30,511		\$ 65,396		\$ 56,390		\$ 35,978		\$ 67,366	
Average household size	1.71		2.41		2.46		2.10		2.45	
Owner-occupied	1,301	29%	1,860	50%	1,707	62%	1,249	36%	3,105	84%
Average household size	2		2.67		2.44		2.21		2.52	
Renter-occupied	3,242	71%	1,845	50%	1,052	38%	2,247	64%	587	16%
Average household size	1.57		2.19		2.47		2.09		1.98	
Median rent paid	\$ 604		\$ 838		\$ 1,083		\$ 792		\$ 903	
Households by type										
Family households	1,406	31%	1,854	50%	1,261	46%	1,223	35%	2,392	65%
With children under 18 years	645	14%	819	22%	550	20%	613	18%	1,085	29%
Married-couple family households	833	18%	1,433	39%	1,044	38%	816	23%	2,006	54%
With children under 18 years	188	4%	564	15%	420	15%	310	9%	797	22%
Single-person family households	573	13%	421	11%	217	8%	407	12%	386	11%
With children under 18 years	457	10%	255	7%	130	5%	303	9%	287	8%
Nonfamily households	3,194	69%	1,852	50%	1,510	55%	2,265	65%	1,298	35%
Householder living alone	2,734	59%	1,071	29%	924	33%	1,447	42%	1,027	28%
65 years and over	662	14%	218	6%	510	18%	393	11%	516	14%
Households with one or more children under 18 years	651	14%	842	23%	550	20%	613	18%	1,085	29%
Households with one or more people 65 years and over	1,024	22%	737	20%	912	33%	613	18%	1,024	28%
Year householder moved into unit										
Moved in 2010 or later	2,803	61%	2,181	59%	1,359	49%	2,176	62%	1,152	31%
Moved in 2000-2009	982	21%	631	17%	575	21%	619	18%	1,306	35%
Moved in 1990-1999	334	7%	523	14%	342	12%	313	9%	481	13%
Moved in 1980-1989	187	4%	207	6%	201	7%	194	6%	294	8%
Moved in 1979 or earlier	239	5%	164	4%	281	10%	193	6%	459	12%
Vehicles per household										
No vehicles	1,428	31%	150	4%	259	9%	759	22%	166	5%
1 vehicle available	1,785	39%	1,200	32%	844	30%	1,208	35%	1,148	31%
2 vehicles available	993	22%	1,721	47%	930	34%	1,018	29%	1,611	44%
3 or more vehicles available	338	7%	635	17%	725	26%	510	15%	768	21%
Cost-burdened households										
All households for which cost burden is calculated	4,422		3,672		2,649		3,422		3,638	
Cost-burdened households	2,001	45%	1,371	37%	950	36%	1,556	46%	814	22%
Owner households for which cost burden is calculated	1,294		1,856		1,700		1,249		3,095	
Cost-burdened owner households	343	27%	392	21%	224	13%	310	25%	523	17%
Renter households for which cost burden is calculated	3,127		1,815		949		2,173		543	
Cost-burdened renter households	1,658	53%	798	54%	726	77%	1,245	57%	290	53%

	Lincoln Park		Piedmont		West Duluth		Western River Communities		Woodland	
Housing Units and Households	#	%	#	%	#	%	#	%	#	%
<i>Housing Units</i>										
Total housing units	2,922		4,876		5,217		3,097		2,654	
Vacant housing units (seasonal units included)	324	11%			373	7%	123	4%	73	3%
Occupied housing units	2,598	89%	4,778	98%	4,845	93%	2,975	96%	2,580	97%
<i>Year built</i>										
2000 or later			610	13%	343	7%	228	7%	110	4%
1970-1999	509	17%	1,608	33%	1,109	21%	710	23%	469	18%
1940-1969	520	18%	1,915	39%	980	19%	843	27%	1,054	40%
1939 or earlier	1,854	63%	742	15%	2,785	53%	1,317	43%	1,021	39%
<i>Households</i>										
Total Households	2,598		4,791		4,849		2,978		2,576	
Median household income	\$ 36,349		\$ 56,621		\$ 46,664		\$ 42,550		\$ 77,923	
Average household size	2.21		2.12		2.24		2.20		2.46	
Owner-occupied	1,188	46%	3,478	73%	3,487	72%	2,071	70%	2,241	87%
Average household size	2.42		2.24		2.27		2.24		2.46	
Renter-occupied	1,410	54%	1,299	27%	1,358	28%	904	30%	339	13%
Average household size	2.08		1.87		2.24		2.11		3.39	
Median rent paid	\$ 686		\$ 869		\$ 674		\$ 718		\$ 1,204	
<i>Households by type</i>										
Family households	1,236	48%	2,773	58%	2,662	55%	1,731	58%	1,794	70%
With children under 18 years	778	30%	1,110	23%	1,260	26%	831	28%	818	32%
Married-couple family households	615	24%	2,225	46%	1,806	37%	1,180	40%	1,478	57%
With children under 18 years	312	12%	725	15%	652	14%	394	13%	618	24%
Single-person family households	621	24%	548	11%	856	18%	552	19%	316	12%
With children under 18 years	466	18%	385	8%	608	13%	437	15%	199	8%
Nonfamily households	1,362	52%	2,018	42%	2,186	45%	1,247	42%	782	30%
Householder living alone	1,006	39%	1,750	37%	1,779	37%	1,140	38%	640	25%
65 years and over	230	9%	895	19%	560	12%	456	15%	258	10%
Households with one or more children under 18 years	793	31%	1,161	24%	1,280	26%	838	28%	826	32%
Households with one or more people 65 years and over	407	16%	1,699	36%	1,297	27%	794	27%	725	28%
<i>Year householder moved into unit</i>										
Moved in 2010 or later	1,299	50%	1,945	41%	1,956	40%	1,146	39%	848	33%
Moved in 2000-2009	683	26%	1,352	28%	1,306	27%	942	32%	590	23%
Moved in 1990-1999	345	12%	625	13%	703	15%	383	13%	462	18%
Moved in 1980-1989	145	6%	379	8%	338	7%	168	6%	246	10%
Moved in 1979 or earlier	156	6%	476	10%	543	11%	335	11%	434	17%
<i>Vehicles per household</i>										
No vehicles	542	21%	452	9%	399	8%	316	11%	66	3%
1 vehicle available	1,008	39%	1,557	33%	1,977	41%	1,184	40%	779	30%
2 vehicles available	773	30%	1,993	42%	1,757	36%	957	32%	1,216	47%
3 or more vehicles available	275	11%	776	16%	712	15%	519	17%	520	20%
<i>Cost-burdened households</i>										
All households for which cost burden is calculated	2,500		4,734		4,728		2,887		2,547	
Cost-burdened households	907	36%	1,161	25%	1,247	26%	837	29%	515	20%
Owner households for which cost burden is calculated	1,170		3,478		3,483		2,065		2,233	
Cost-burdened owner households	311	27%	500	14%	664	19%	485	24%	342	15%
Renter households for which cost burden is calculated	1,330		1,255		1,246		823		314	
Cost-burdened renter households	596	45%	661	53%	583	47%	352	43%	173	55%

	Central Hillside/Park Point		Congdon		Duluth Heights/Kenwood		East Hillside		Lakeside/Lester Park	
	#	%	#	%	#	%	#	%	#	%
Education and Workforce										
<i>Educational attainment</i>										
Population (25 years and older)	5,829	100%	5,108	100%	4,023	100%	4,069	100%	6,170	100%
Less than high school	626	11%	129	3%	171	4%	220	5%	227	4%
High school diploma or GED	1,292	22%	558	11%	862	21%	854	21%	1,111	18%
Some college or associate degree	2,028	35%	1,423	28%	1,074	27%	1,445	36%	1,777	29%
Bachelor's degree	1,245	21%	1,668	33%	975	24%	1,123	28%	1,961	32%
Graduate or professional degree	639	11%	1,330	26%	941	23%	426	11%	1,094	18%
High school graduate or higher	5,203	89%	4,979	98%	3,852	96%	3,849	95%	5,943	96%
Bachelor's degree or higher	1,883	32%	2,998	59%	1,916	48%	1,550	38%	3,055	50%
<i>Working adults</i>										
Total civilian non-institutionalized population, age 18-64	5,675		6,557		8,698		5,784		5,618	
% of working age adults who are employed	3,743	66%	5,297	81%	5,884	68%	4,433	77%	4,524	81%
<i>Employed workers</i>										
Total employed workers	3,533	100%	3,869	100%	2,890	100%	3,572	100%	4,193	100%
<i>Workers Age</i>										
Age 29 or younger	1,169	33%	1,276	33%	761	26%	1,325	37%	860	21%
Age 30 to 54	1,541	44%	1,829	47%	1,400	48%	1,622	45%	2,325	55%
Age 55 or older	823	23%	764	20%	729	25%	625	18%	1,008	24%
<i>Workers Earnings</i>										
\$15,000 per year or less	1,060	30%	947	25%	634	22%	956	27%	780	19%
\$15,001 to \$39,999 per year	1,349	38%	1,209	31%	840	29%	1,494	42%	1,240	30%
\$40,000 or more per year	1,124	32%	1,713	44%	1,416	49%	1,122	31%	2,173	52%
<i>Workers by industry of employment</i>										
Accommodation and food services	478	14%	451	12%	222	8%	452	13%	311	7%
Administration & support, waste management, and remediation	172	5%	102	3%	81	3%	128	4%	100	2%
Agriculture, forestry, fishing and hunting										
Arts, entertainment, and recreation	77	2%	73	2%	57	2%	81	2%	56	1%
Construction	107	3%	112	3%	106	4%	108	3%	163	4%
Educational services	326	9%	536	14%	489	17%	341	10%	621	15%
Finance and insurance	132	4%	138	4%	121	4%	142	4%	178	4%
Health care and social assistance	920	26%	1,016	26%	689	24%	966	27%	1,117	27%
Information	44	1%	62	2%	40	1%	52	2%	52	1%
Management of companies and enterprises	53	2%	69	2%	35	1%	56	2%	63	2%
Manufacturing	141	4%	146	4%	122	4%	138	4%	179	4%
Mining, quarrying, and oil and gas extraction										
Other services (excluding public administration)	143	4%	126	3%	88	3%	145	4%	109	3%
Professional, scientific, and technical services	167	5%	218	6%	143	5%	152	4%	265	6%
Public administration	164	5%	178	5%	143	5%	155	4%	259	6%
Real estate and rental and leasing	37	1%	50	1%	35	1%	43	1%		
Retail trade	344	10%	365	9%	304	11%	403	11%	356	9%
Transportation and warehousing	94	3%	83	2%	96	3%	105	3%	152	4%
Utilities			46	1%	38	1%			58	1%
Wholesale trade	86	2%	72	2%	71	3%	64	2%	87	2%
<i>Workers by race</i>										
White alone	3,065	87%	3,634	94%	2,729	94%	3,249	91%	4,040	96%
Black or African American alone	206	6%	75	2%			116	3%		
American Indian or Alaska Native alone	124	4%	57	2%			74	2%		
Asian alone	70	2%	61	2%	78	3%	55	2%	43	1%
Native Hawaiian or Other Pacific Islander alone										
Two or more race groups	66	2%	42	1%	32	1%	77	2%	46	1%
<i>Workers by educational attainment</i>										
Less than high school	239	7%	202	5%	133	5%	211	6%	217	5%
High school or equivalent, no college	752	21%	654	17%	604	21%	661	19%	985	24%
Some college or associate degree	806	23%	952	25%	724	25%	758	21%	1,170	28%
Bachelor's degree or advanced degree	567	16%	785	20%	668	23%	617	17%	961	23%
Educational attainment not available (workers under age 30)	1,169	33%	1,276	33%	761	26%	1,325	37%	860	21%
<i>Workers by employment location</i>										
Workers with an identified employer location (top 10 locations)	3,269		3,628		2,684		3,328		3,911	
Duluth	2,449	75%	2,775	77%	1,947	73%	2,469	74%	2,995	77%
Hermantown	148	5%	127	4%	118	4%	147	4%	132	3%
Cloquet	53	2%	66	2%	33	1%	57	2%	62	2%
Two Harbors									41	1%
Proctor	44	1%								
Hibbing	36	1%	38	1%			38	1%		
Minneapolis					47	2%	36	1%		
Bloomington										
Arnold										
St. Paul	34	1%			32	1%				
Minnetonka										
All other	441	14%	508	14%	398	15%	485	15%	530	14%
<i>Workers by distance to employment location (linear)</i>										
Less than 10 miles	2,620	80%	2,933	81%	2,102	78%	2,658	80%	3,065	78%
10 to 24 miles	105	3%	141	4%	80	3%	133	4%	322	8%
25 to 50 miles			37	1%			51	2%	64	2%
Greater than 50 miles	517	16%	517	14%	479	18%	486	15%	460	12%
<i>Transportation to work</i>										
Workers (16 years and older)	3,965	100%	5,496	100%	5,059	100%	4,471	100%	4,750	100%
Car, truck, or van (including passengers)	2,928	74%	4,623	84%	3,642	72%	3,458	77%	4,286	90%
Public transportation	313	8%	262	5%	51	1%	299	7%	81	2%
Walked, biked, worked at home, or other	724	18%	611	11%	1,366	27%	714	16%	384	8%
<i>Travel time to work</i>										
Total workers age 16+ (not home based)	3,829	100%	5,234	100%	4,775	100%	4,316	100%	4,567	100%
Less than 10 minutes	999	26%	1,533	29%	1,419	30%	1,093	25%	541	12%
10-19 minutes	1,873	49%	2,681	51%	2,315	49%	2,234	52%	2,061	45%
20-29 minutes	460	12%	561	11%	701	15%	516	12%	1,427	31%
30 minutes or longer	497	13%	458	9%	340	7%	473	11%	537	12%

	Lincoln Park		Piedmont		West Duluth		Western River Communities		Woodland	
	#	%	#	%	#	%	#	%	#	%
Education and Workforce										
<i>Educational attainment</i>										
Population (25 years and older)	3,741	100%	7,838	100%	7,572	100%	4,769	100%	4,392	100%
Less than high school	369	10%	500	6%	756	10%	398	8%	159	4%
High school diploma or GED	1,283	34%	2,696	34%	2,356	31%	1,522	32%	774	18%
Some college or associate degree	1,319	35%	2,379	30%	3,090	41%	1,924	40%	1,171	27%
Bachelor's degree	590	16%	1,562	20%	1,002	13%	699	15%	1,481	34%
Graduate or professional degree	180	5%	702	9%	368	5%	227	5%	807	18%
High school graduate or higher	3,372	90%	7,337	94%	6,816	90%	4,372	92%	4,233	96%
Bachelor's degree or higher	770	21%	2,263	29%	1,370	18%	926	19%	2,288	52%
<i>Working adults</i>										
Total civilian non-institutionalized population, age 18-64	3,866		5,650		6,834		4,154		3,924	
% of working age adults who are employed	2,738	71%	4,504	3%	5,381	79%	3,037	73%	3,178	81%
<i>Employed workers</i>										
Total employed workers	2,759	100%	4,183	100%	5,221	100%	3,079	100%	3,292	100%
<i>Workers Age</i>										
Age 29 or younger	835	30%	1,042	25%	1,307	25%	767	25%	726	22%
Age 30 to 54	1,438	52%	2,119	51%	2,828	54%	1,606	52%	1,748	53%
Age 55 or older	486	18%	1,022	24%	1,086	21%	706	23%	818	25%
<i>Workers Earnings</i>										
\$15,000 per year or less	678	25%	876	21%	1,149	22%	656	21%	633	19%
\$15,001 to \$39,999 per year	1,305	47%	1,336	32%	2,303	44%	1,358	44%	908	28%
\$40,000 or more per year	776	28%	1,971	47%	1,769	34%	1,065	35%	1,751	53%
<i>Workers by industry of employment</i>										
Accommodation and food services	325	12%	314	8%	484	9%	268	9%	260	8%
Administration & support, waste management, and remediation	109	4%	122	3%	161	3%	91	3%	95	3%
Agriculture, forestry, fishing and hunting										
Arts, entertainment, and recreation	79	3%	57	1%	100	2%	52	2%	41	1%
Construction	119	4%	191	5%	244	5%	203	7%	125	4%
Educational services	206	8%	452	11%	402	8%	249	8%	507	15%
Finance and insurance	99	4%	156	4%	205	4%	106	3%	115	4%
Health care and social assistance	692	25%	1,007	24%	1,407	27%	735	24%	843	26%
Information	47	2%	66	2%	59	1%	42	1%	50	2%
Management of companies and enterprises	36	1%	62	2%	65	1%	41	1%	37	1%
Manufacturing	165	6%	180	4%	325	6%	245	8%	172	5%
Mining, quarrying, and oil and gas extraction										
Other services (excluding public administration)	136	5%	162	4%	220	4%	91	3%	100	3%
Professional, scientific, and technical services	119	4%	194	5%	201	4%	109	4%	174	5%
Public administration	111	4%	244	6%	248	5%	189	6%	212	6%
Real estate and rental and leasing							34	1%	37	1%
Retail trade	291	11%	555	13%	613	12%	375	12%	293	9%
Transportation and warehousing	111	4%	190	5%	199	4%	130	4%	93	3%
Utilities			64	2%	64	1%			52	2%
Wholesale trade	62	2%	107	3%	150	3%	81	3%	72	2%
<i>Workers by race</i>										
White alone	2,428	88%	4,000	96%	4,957	95%	2,947	96%	3,165	96%
Black or African American alone	109	4%			72	1%				
American Indian or Alaska Native alone	122	4%	50	1%	92	2%	54	2%		
Asian alone	36	1%							43	1%
Native Hawaiian or Other Pacific Islander alone										
Two or more race groups	63	2%	51	1%	65	1%	39	1%		
<i>Workers by educational attainment</i>										
Less than high school	194	7%	231	6%	341	7%	204	7%	185	6%
High school or equivalent, no college	632	23%	967	23%	1,280	25%	763	25%	687	21%
Some college or associate degree	681	25%	1,105	26%	1,389	27%	837	27%	908	28%
Bachelor's degree or advanced degree	417	15%	838	20%	904	17%	508	17%	786	24%
Educational attainment not available (workers under age 30)	835	30%	1,042	25%	1,307	25%	767	25%	726	22%
<i>Workers by employment location</i>										
Workers with an identified employer location (top 10 locations)	2,570		3,921		4,775		2,777		3,076	
Duluth	1,877	73%	2,733	70%	3,368	71%	1,953	70%	2,378	77%
Hermantown	144	6%	293	8%	273	6%	130	5%	126	4%
Cloquet	66	3%	93	2%	107	3%	89	3%	42	1%
Two Harbors									32	1%
Proctor	26	1%			99	2%	44	2%		
Hibbing	26	1%	47	1%	62	1%	38	1%		
Minneapolis			50	1%						
Bloomington										
Arnold										
St. Paul										
Minnetonka										
All other	347	14%	581	15%	713	15%	437	16%	394	13%
<i>Workers by distance to employment location (linear)</i>										
Less than 10 miles	2,088	81%	3,106	79%	3,762	79%	1,446	52%	2,550	83%
10 to 24 miles	127	5%	158	4%	293	6%	897	32%	140	5%
25 to 50 miles	30	1%	46	1%	72	2%	39	1%		
Greater than 50 miles	325	13%	611	15%	648	14%	395	14%	365	12%
<i>Transportation to work</i>										
Workers (16 years and older)	2,890	100%	4,696	100%	5,602	100%	3,159	100%	3,470	100%
Car, truck, or van (including passengers)	2,457	85%	4,367	93%	5,005	89%	2,647	84%	3,166	91%
Public transportation	166	6%			167	3%	311	10%	70	2%
Walked, biked, worked at home, or other	267	9%	215	5%	430	8%	201	6%	235	7%
<i>Travel time to work</i>										
Total workers age 16+ (not home based)	2,820	100%	4,576	100%	5,400	100%	3,021	100%	3,322	100%
Less than 10 minutes	471	17%	915	20%	843	16%	210	7%	329	10%
10-19 minutes	1,587	56%	2,731	60%	2,711	50%	932	31%	1,530	46%
20-29 minutes	452	16%	528	12%	1,279	24%	1,051	35%	1,138	34%
30 minutes or longer	310	11%	402	9%	567	11%	828	27%	324	10%