City of Duluth Minnesota

2015 - 2019 Consolidated Plan

Please address all comments to:
Community Development Division
411 W. 1st Street Rm. 407
Duluth, MN 55802

Or submit comments online at:
http://www.duluthmn.gov/community-development/

Draft
10/31/14

Executive Summary

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

1. Introduction

The Consolidated Plan is a five-year planning document laying out the goals for the City of Duluth's Community Development program. The City uses a collaborative process to establish a unified vision for community development actions. This process allows the City Administration and Citizens to shape the various housing and community development programs into effective, coordinated neighborhood and community development strategies. It also creates the opportunity for strategic planning and citizen participation to take place in a comprehensive context, and to reduce duplication of effort at the local level. This document outlines the community's outcomes and objectives for 2015 through 2019.

The Consolidated Plan approach is also the means to meet the submission requirements for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Emergency Solutions Grant (ESG) formula programs.

The statutes for the formula grant programs set forth three basic goals against which the plan and the jurisdiction's performance under the plan will be evaluated by HUD. Each year the City's plan must state how it will pursue these goals for all community development programs, as well as all housing programs.

2. Summary of the objectives and outcomes identified in the Plan Needs Assessment Overview

DECENT HOUSING:

- assisting homeless persons to obtain affordable housing;
- assisting persons at risk of becoming homeless;
- retaining the affordable housing stock;
- increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly members of disadvantaged minorities, without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability;
- increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to live in dignity and independence; and
- providing affordable housing that is accessible to job opportunities.

OMB Control No: 2506-0117 (exp. 07/31/2015)

A SUITABLE LIVING ENVIRONMENT:

- improving the safety and livability of neighborhoods;
- eliminating blighting influences and the deterioration of property and facilities;
- increasing access to quality public and private facilities and services;
- reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods;
- restoring and preserving properties of special historic, architectural, or aesthetic value; and
- conserving energy resources and use of renewable energy sources.

EXPANDED ECONOMIC OPPORTUNITIES:

- job creation and retention;
- establishment, stabilization and expansion of small businesses (including micro-businesses);
- the provision of public services concerned with employment;
- the provision of jobs to low-income persons living in areas affected by those programs and activities, or jobs resulting from carrying out activities under programs covered by the plan;
- availability of mortgage financing for low-income persons at reasonable rates using non-discriminatory lending practices;
- access to capital and credit for development activities that promote the long-term economic and social viability of the community; and
- empowerment and self-sufficiency for low-income persons to reduce generational poverty in federally assisted housing and public housing.

3. Evaluation of past performance

Each program that is funded with CDBG, HOME and ESG funding is monitored annually to make sure that the number of people who were going to be served for a specific need were met. If not, then that program is evaluated to determine if the need for that the program is still a priority or if that need is being met elsewhere due to other new funding sources or if the community dynamics have changed and the demand for a specific need has decreased. Every year there are public input sessions to gather input on community needs to evaluate if a need should be a goal for this plan. A description of the goals and and a description of the public input process is provided in the annual action plan, which is submitted to HUD for review and approval.

4. Summary of citizen participation process and consultation process

The citizen participation process is outlined in the 2014 Citizen Participation Plan and was integral in goal-setting and developing strategies in the plan. The City used a combination of public hearing, newspaper outreach, and surveys (both online and in person) to identify needs in Duluth.

The Citizen Participation Plan lists out the public process that the Community Development Division utilizes throughout the year. The plan includes the process for the development of the Consolidated Plan. The Citizen Participation Plan can be found online at: http://www.duluthmn.gov/community-development/

The process starts with an analysis of the housing market to determine the affordable housing gaps and a community needs assessment. Then the Community Development Division holds a community development and housing needs public hearing, which states the process to develop the Consolidated Plan and address the general needs of the community that could be addressed with HUD program funds. The purpose of this hearing is to review housing market data to determine housing needs and to analyze other survey data to define community development needs. The CD Division meets with various concerned groups and agencies that deal with community needs, after which a draft Consolidated Plan priorities and strategies will be developed. This is then followed by a summary advertisement in the local newspaper and news release that copies are available for inspection at the local library, as well as the offices of the CD Division in City Hall. All who are interested may obtain copies, at no cost, of the draft Consolidated Plan during the 30-day public comment period. A summary of any comments, written or oral, received during the 30-day comment period, along with the City response to the same, will be attached to and become part of the "final" Consolidated Plan. An additional Public Hearing is held by the CD Committee or the City Council after the 30-day comment period and prior to the City Council formally approving the Consolidated Plan and forwarding it to HUD for review and approval.

In addition to this process the Community Development Division conducted a survey, both online and in-person to reach more citizens in Duluth. The online survey was advertised on local television news stations, social media, and through word-of-mouth and could be filled out at home, at area branch libraries, program provided public computers, or on smartphones. The survey was also made available at several local food shelves and soup kitchens and at a neighborhood event to gain further comments, which assisted in getting to neighborhoods and programs that serve a proportionally high percentage of low income individuals and persons of color.

5. Summary of public comments

The 30-day public comment period will begin on Friday, October 31 2014 and will end on Monday, December 1 2014. Results will be reported after this timeframe.

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

To be completed after the public comment process.

7. Summary

The Consolidated Plan consists of a number of parts including: a housing and community needs assessment that also analyzes the current market conditions, a section on the needs for people who are homeless, a Strategic Plan section and the Annual Action Plan. The Strategic Plan section is a key component of the Consolidated Plan, as this section outlines the Community's objectives and outcomes to meeting the needs identified in the assessment section. The Annual Action Plan, one of five annual plans, outlines how the federal Community Development resources will be allocated in FY 2015. Each year after that an Annual Plan will be completed to communicate how these funds will be allocated to meet the objectives identified in the Consolidated Plan.

The Annual Action Plans will also include a section that evaluates the community's performance towards meeting the objectives outlined in the Consolidated Plan, meaning how well we are achieving progress towards the priority needs of the City of Duluth.

The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	DULUTH	Community Development Division
HOME Administrator	DULUTH	Community Development Division
ESG Administrator	DULUTH	Community Development Division

Table 1 – Responsible Agencies

Narrative

On behalf of the City of Duluth, the Community Development Division within the Department of Planning and Construction Services is the lead agency responsible for formulating plans and strategies for housing and community development efforts. The Division is directly responsible for administering and developing the Consolidated Plan, which outlines the community's goals and investment strategies for the Community Development Block Grant (CDBG) Program, HOME Investment Partnerships Program (HOME) and Emergency Shelter Grant Program (ESGP). Also, the Community Development Division works with other City departments, the Housing and Redevelopment Authority of Duluth (HRA), neighborhood and citywide non-profit groups to implement the Community Development program.

Consolidated Plan Public Contact Information

Keith Hamre, Director of Planning and Construction Services & Community Development Manager
411 West First Street
City Hall, Room 208
Duluth, MN 55802
Email: khamre@duluthmn.gov
Phone: 218-730-5480
Fax: 218-730-5915

OMB Control No: 2506-0117 (exp. 07/31/2015)

PR-10 Consultation - 91.100, 91.200(b), 91.215(l)

1. Introduction

The City of Duluth is dedicated to developing a Consolidated Plan that is effective in meeting the needs of low income & moderate income people within the City. The Community Development Division spent nine months developing this plan which included outreach to the public and a variety of stakeholders.

An advisory group of citizens assists with reviewing community development strategies by providing direct citizen input into the planning and prioritization process. That group is the Community Development Committee (CD Committee). The CD Committee is made up of nine communitywide representatives. The CD Committee is advisory to the City Administration and the City Council.

The participation process for the Community Development Program is detailed in the City of Duluth Citizen Participation Plan, January 2014 publication. In general terms, the process consists of two tiers. The CD Committee helps to provide community perspectives on the Community Development Program and oversee the funding process. Secondly, the City uses a public hearing, community needs survey, and online forums to hear from the public and agencies that provide services in Duluth's CDBG Target Areas and represent neighborhood perspectives.

The Community Development Division, as the lead entity, strives to involve many partners in addressing community development needs and issues. There are many other participants involved with housing and community development issues and programs in Duluth. As the lead agency, the Division strives to achieve close cooperation among these other entities.

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

The Community Development Division works closely with the Housing and Redevelopment Authority of Duluth (Duluth HRA) which is the local public housing administrator for Duluth. The City, along with the Duluth HRA, One Roof Community Housing, Ecolibrium3, and the Arrowhead Economic Opportunity Agency all collaborated together to form the Housing Resource Connection, which is a place for Duluth residents to locate and apply for a variety of housing resources and assistance. Since forming the Housing Resource Connection, the agencies have worked to coordinate a single application that allows potential participants to make one application, and then find what programs best suit their needs. Also through the City's participation in the group called the Affordable Housing Coalition, which is made up of numerous agencies in Duluth that provide housing and homeless services and programs to those in need. This group meets regularly to discuss issues and gaps in service, as well as, works to develop strategies to assist those in need of housing assistance.

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

The City of Duluth, in collaboration with St. Louis County, has adopted a ten-year plan to address homelessness. The ten-year plan contains new strategies for ending homelessness, particularly for people who are chronically homeless. The City is a partner in the implementation process for the plan and has representation on the implementation committee. This committee includes members from the public, nonprofit and private sectors. Further definition is needed for better coordination with resources to meet the needs of persons who are homeless or at risk of becoming homeless to address shortages in the operation of units within the Continuum of Care inventory. City has been leading discussions with service providers and the Continuum of Care to define what stabilized after homelessness is, to create a common goal for all providers.

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

The City of Duluth has worked closely with the St. Louis Continuum of Care (CoC) in developing an ESG manual and guidebook with the City's policies. Specific protocols have been determined for prioritizing services to eligible households. As part of the CoC several committees have been developed that have representation from the City, County, service providers, and clients. These committees and their duties are as follows.

Heading Home St. Louis County Leadership Council- Establishes annual targets through strategic planning, decides final funding and reallocation, review and ranks projects, and monitors program performances.

Data/HMIS Committee- Regularly review system level data and identify additional internal and external data sources. Oversees and monitors HMIS data collection and data quality and resolve any issues between provider (s) and Wilder.

Performance Evaluation Committee – Reviews the annual Point in Time Count and makes recommendations to the leadership council.

10 year plan committee – Identify strategies not yet in place, revisit and update the objective achievements and plan of action.

Other ad-hoc workgroups have been created to address Coordinate Access, communication of priorities, and prevention targeting.

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

Table 2 – Agencies, groups, organizations who participated

1	**Agency/Group/Organization**	HOUSING AND REDEVELOPMENT AUTHORITY OF DULUTH
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Lead-based Paint Strategy Public Housing Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The City of Duluth and the Housing and Redevelopment Authority of Duluth (HRA) have an ongoing working relationship, and HRA was consulted throughout the Consolidated Plan process to take into account housing needs and strategies.
2	**Agency/Group/Organization**	Duluth Affordable Housing Coalition
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Duluth's Affordable Housing Coalition is made up of over twenty non-profit organizations and governmental agencies working to develop and preserve affordable housing throughout Duluth. The Coalition addresses the need for affordable housing along the entire spectrum from the "hardest to house" through workforce housing. The consultation with this group was extremely helpful in identifying gaps in service and developing priorities and goals. The City will continue to work with this group to prioritize and direct funding.
3	**Agency/Group/Organization**	COMMUNITY ACTION DULUTH
	Agency/Group/Organization Type	Services-Children Services-Education Services-Employment Community Action Agency
	What section of the Plan was addressed by Consultation?	Economic Development

OMB Control No: 2506-0117 (exp. 07/31/2015)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Community Action Duluth is a community action agency and provides a number of services including a Financial Opportunities Center, is a career and personal financial service centers that focus on the financial bottom line for low-to-moderate income individuals. Community Action has a unique perspective and their input on low income needs throughout the community is very useful. They will continue to be consulted for the identification of barriers to employment and increasing income.
4	**Agency/Group/Organization**	Duluth Workforce Center
	Agency/Group/Organization Type	Services-Education Services-Employment Local and State Collaboration
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy Employment Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Duluth Workforce Center is a collaboration of the several agencies including the Duluth Workforce Division and the state Department of Employment and Economic Development. The City relies upon this agency to coordinate job training, education, and employment connections. The Duluth Workforce Center will continue to be used in identifying growing industry sectors, employment training needs, and other efforts needed to grow jobs and employment in Duluth. As identified by the center, Duluth is now working to encourage economic development efforts to include training for construction and aircraft assembly sectors, which are in great need.
5	**Agency/Group/Organization**	Community Development Committee
	Agency/Group/Organization Type	Citizen Committee
	What section of the Plan was addressed by Consultation?	Oversees City CDBG Process

OMB Control No: 2506-0117 (exp. 07/31/2015)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Community Development Committee is a group of appointed citizens that have interest and experience with housing and community development issues. The Committee oversees the entire CDBG Program; including the development of the Consolidated Plan, Annual Action Plan, CAPER Report, and all fnding recommendations. The committee makes recommendations to the City Council and Mayor.
6	**Agency/Group/Organization**	United Way of Greater Duluth
	Agency/Group/Organization Type	Services-Children Services-Education Services-Employment Foundation
	What section of the Plan was addressed by Consultation?	Funding Partner
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The United Way of Greater Duluth helps the community through strategic investments in a network of local programs and initiatives, United Way helps meet the health and human care needs of people in the Greater Duluth area by investing in the building blocks of a good life: Education, Income Health and Basic Needs. As a funding partner with the City, the two agencies will continue to work together to identify gaps and work to avoid duplication of services/funding.
7	**Agency/Group/Organization**	Ordean Foundation
	Agency/Group/Organization Type	Private Foundation Foundation
	What section of the Plan was addressed by Consultation?	Funding Partner
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Ordean Foundation works to fund projects and efforts in the Duluth area, often times with much overlap of CDBG related activities. The City of Duluth will continue to collaborate with the Ordean Foundation to continue to ensure that gaps in services are met and avoid duplication of services/funding.

OMB Control No: 2506-0117 (exp. 07/31/2015)

8	**Agency/Group/Organization**	Northland Foundation
	Agency/Group/Organization Type	Private Foundation Foundation
	What section of the Plan was addressed by Consultation?	Funding Partner
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Northland Foundation is a regional foundation serving the communities of northeastern Minnesota, emphasizing funding projects to help children, youth, families, small/medium businesses, and the elderly. The City will continue to work with the Northland Foundation to identify funding gaps and eliminate the duplication of services/funding.
9	**Agency/Group/Organization**	Duluth Superior Area Community Foundation
	Agency/Group/Organization Type	Private Foundation Foundation
	What section of the Plan was addressed by Consultation?	Funding Partner
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Duluth Superior Area Community Foundation works to improve the region through funding projects that include the arts, community and economic development, education, environment, and human services. The City will continue to collaborate with the foundation to identify the gaps in services and avoid the duplication of services.
10	**Agency/Group/Organization**	Generations Health Care Initiatives
	Agency/Group/Organization Type	Private Foundation Foundation
	What section of the Plan was addressed by Consultation?	Funding Partner

OMB Control No: 2506-0117 (exp. 07/31/2015)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Generations Health Care Initiatives is a private foundation that supports innovative, local programs that expands access to health care and improves the health of underserved people in the Duluth/Superior area and northeastern Minnesota. Generations place in Duluth is important and the City relies upon Generations to provide health related information, like the report titled "Bridge to Health" which provides information that helps to identify gaps and health needs in the region.
11	**Agency/Group/Organization**	Duluth Local Initiatives Support Corporation
	Agency/Group/Organization Type	Local Initiative Support Corporation
	What section of the Plan was addressed by Consultation?	Economic Development Funding Partner
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Duluth Local Initiative Support Coalition (Duluth LISC) is an agency in Duluth that works to help nonprofit community development organizations transform distressed neighborhoods into healthy and sustainable communities. Duluth LISC also helps to coordinate the neighborhood revitalization plans that Duluth has completed for each of the four core neighborhoods in Duluth. The City works with LISC to coordinate the Duluth At Work program which is a job training program for low income people. Duluth works with LISC to identify needs, coordinate revitilization efforts, and collaborate to reach the low income neighborhoods and CDBG Target areas in Duluth.
12	**Agency/Group/Organization**	Saint Louis County Health and Human Services Dept
	Agency/Group/Organization Type	Services-Children Services-Health Child Welfare Agency Other government - County
	What section of the Plan was addressed by Consultation?	County Government

OMB Control No: 2506-0117 (exp. 07/31/2015)

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The St. Louis County Health and Human Services Department manages the county Continuum of Care process and works to coordinate homeless and emergency services in within the County. The County is a partner with the City in a providing coordination in homeless services and working to identify gaps and unmet needs.
13	**Agency/Group/Organization**	Saint Louis County Community Development Division
	Agency/Group/Organization Type	Other government - County
	What section of the Plan was addressed by Consultation?	County Government
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The St. Louis County Community Development Division manages the CDBG funds that come to the county. Although these funds are directed outside of the City of Duluth, the City continues to consult with the county's Community Development staff in order to look for opportunities for collaboration and to identify gaps.
14	**Agency/Group/Organization**	ARDC- Arrowhead Area Agency on Aging
	Agency/Group/Organization Type	Services-Elderly Persons Other government - Local
	What section of the Plan was addressed by Consultation?	Senior Services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	The Arrowhead Regional Development Commission-Arrowhead Area Agency on Aging the designated area agency on aging for the seven county arrowhead region and works to provide three critical functions: OAA funding administration, community planning and service development, and information and assistance. Further coordination and consultation could be helpful in identifying needs and service gaps for elderly people in the community.

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

NA

OMB Control No: 2506-0117 (exp. 07/31/2015)

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Saint Louis County	The Continuum of Care efforts of the county relate closely with the goals and strategies of the development of the Strategic Plan. The City works closely with the county to ensure that the needs associated in the Continuum of Care are also addressed within the Strategic Plan. Both plans have a goal to provide homeless services and ensure that there is adequate coverage of homeless programs.
10-Year Plan to End Homelessness	Saint Louis County	In 2005, St. Louis County developed the 10-year Plan to End Homelessness to create a new strategy, based on national and local best practices, to reduce the suffering of our most vulnerable citizens. The City's strategic plan closely follows this plan and strives to meet the goals that were set out in the plan.
Duluth Comprehensive Land Use Plan	City of Duluth	In 2005, the City completed the Comprehensive Land Use Plan in order to lay out goals and priorities for neighborhoods and areas in Duluth. The plan put forth strategies to help Duluth's parks, housing, transportation, and service needs. The Strategic Plan is guided by this plan in terms of developing strong neighborhoods in Duluth.
At Home in Duluth Revitalization Plans	Duluth Local Initiative Support Corporation	In 2012, Duluth LISC worked to update four neighborhood plans for the Hillside, Lincoln Park, West Duluth, and Morgan Park neighborhoods. The plans developed through input from neighborhood residents, business owners, and service agencies led to identifying needs and setting priorities for each neighborhood. Duluth includes the priorities in these plans within the strategic plan goals.

Table 3 – Other local / regional / federal planning efforts

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

Narrative (optional):

OMB Control No: 2506-0117 (exp. 07/31/2015)

PR-15 Citizen Participation

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

The citizen participation process is outlined in the 2014 Citizen Participation Plan and was integral in goal-setting and developing strategies in the plan. The City used a combination of public hearing, newspaper outreach, and surveys (both online and in person) to identify needs in Duluth.

The Citizen Participation Plan lists out the public process that the Community Development Division utilizes throughout the year. The plan includes the process for the development of the Consolidated Plan. The Citizen Participation Plan can be found online at: http://www.duluthmn.gov/community-development/

The process starts with an analysis of the housing market to determine the affordable housing gaps and a community needs assessment. Then the Community Development Division holds a community development and housing needs public hearing, which states the process to develop the Consolidated Plan and address the general needs of the community that could be addressed with HUD program funds. The purpose of this hearing is to review housing market data to determine housing needs and to analyze other survey data to define community development needs. The CD Division meets with various concerned groups and agencies that deal with community needs, after which a draft Consolidated Plan priorities and strategies will be developed. This is then followed by a summary advertisement in the local newspaper and news release that copies are available for inspection at the local library, as well as the offices of the CD Division in City Hall. All who are interested may obtain copies, at no cost, of the draft Consolidated Plan during the 30-day public comment period. A summary of any comments, written or oral, received during the 30-day comment period, along with the City response to the same, will be attached to and become part of the “final” Consolidated Plan. An additional Public Hearing is held by the CD Committee or the City Council after the 30-day comment period and prior to the City Council formally approving the Consolidated Plan and forwarding it to HUD for review and approval.

In addition to this process the Community Development Division conducted a survey, both online and in-person to reach more citizens in Duluth. The online survey was advertised on local television news stations, social media, and through word-of-mouth and could be filled out at home, at area branch libraries, program provided public computers, or on smartphones. The survey was also made available at several local food shelves and soup kitchens and at a neighborhood event to gain further comments, which assisted in getting to neighborhoods and programs that serve a proportionally high percentage of low income individuals and persons of color.

OMB Control No: 2506-0117 (exp. 07/31/2015)

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community	8 people attended the public hearing.	Support was expressed for rennovation of Duluth Bethel Building, permanent supportive housing, the Housing Access Center, Duluth at Work. Concerns were expressed about moving from transitional housing to permanent supportive housing.	All comments accepted.	http://www.duluthgov.info/downloads/33/Minutes%205-27-14.pdf

OMB Control No: 2506-0117 (exp. 07/31/2015)

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Non-targeted/broad community	A Community and Housing Needs Public Hearing advertisement was placed in the Duluth News Tribune which has a broad circulation throughout the region.	No comments were received.	NA	
3	Internet Outreach	Non-targeted/ broad community	The City conducted an online survey and asked sub-recipients to help to distribute and encourage their participants and the community to identify their needs.	694 responses were recorded and included in the Community Needs Survey Report.	All comments were accepted.	http://www.duluthmn.gov/media/251483/Survey-Complete-Report.pdf

OMB Control No: 2506-0117 (exp. 07/31/2015)

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
4	In person Surveys	Minorities Persons with disabilities Residents of Public and Assisted Housing Public food distribution places	In addition to the online survey, the City also made an effort to connect with low income persons and distribute/provide the surveys.	122 responses were recorded and included in the Community Needs Survey Report.	All comments were accepted.	http://www.duluthmn.gov/media/251483/Survey-Complete-Report.pdf

Table 4 – Citizen Participation Outreach

OMB Control No: 2506-0117 (exp. 07/31/2015)

Needs Assessment

NA-05 Overview

Needs Assessment Overview

Please see the chart created that outlines

2015-2019 Consolidated Plan
Ongoing Key Takeaways

Housing Market Analysis

- Single family home prices/values have not fluctuated largely over the last 5 years
- Duluth's housing stock is old
- Rents, especially 2-bed units, have remained fairly stable
- High need (long waiting lists) for affordable units
- Expensive to build new single family units
- Those 50% and below the median cannot afford most Duluth housing options.

Workforce and Economic Development

- While people are for the most part getting jobs through the Duluth@Work Program they are having a hard time maintaining employment and/or connection to the agency for the entire two years.
- The goal of 25% is being met by most participants; however, most participants have little to no income to begin with so employment is not doing much to lift them out of poverty.
- There are growing fields such as construction that low/moderate income residents can train for but are not being attempted by the Duluth@Work participants.
- More focus needed to reach out to indigenous population for economic development and skill development programs.

Public Services and Homelessness

- The reported number of people receiving food assistance funded by CDBG has decreased annually, from 13,923 in 2010 to 11,790 in 2013. (The Hunger Project now includes only 3 agencies: Damiano, CHUM, and Salvation Army. The Union Gospel Mission is no longer part of the project.)
- The Affordable Care Act has greatly expanded the ability to access health coverage for low-income people and provides dental coverage for all children. Additional research will need to be done to determine what gaps may exist beyond the expanded coverage of the AHCA.

HUD Priorities

- Create a coordinated access system that addresses homelessness in a more efficient and more cost effective way.
- Use standard assessment and targeting strategies to provide assistance to those most in need
- Use homeless funding to convert existing units (transitional housing—the most costly) to less costly and more effective solutions such as Rapid Re-housing and Permanent Supportive Housing.
- Use transitional housing for targeted populations such as youth and persons coming out of institutions
- Incorporate performance measurements based on HEARTH Act goals/outcomes:
  - Reduce the number of homeless living on the streets and in shelters
  - Reduce the number of first-time homeless
  - Reduce the length of time that people remain homeless
  - Reduce the number of persons that return to shelter (homelessness)

Local Priority

- Expand opportunities to access employment assistance

Neighborhood Plan Priorities

- Housing: Improve housing stock through rehabilitation, weatherization, acquisition/rehab of blighted/foreclosed homes, development/upgrade of multi-family units, blight removal, and mixed-use development
- Economic Development: Assist in providing access to vo-tech, job skills, and sustainable employment, support business expansion, skill development opportunities, explore childcare, commercial corridor revitalization, and industrial site development
- Public Facilities: Reconstruct utilities and streets, improve pedestrian/bike connectivity, and city park facility improvements
- Public Services: Support youth mentoring programs and out of school time programs

Funding Climate

- Private foundations are beginning to see better market conditions resulting in level or increased funds to offer
- Foundations aren't funding capital or equipment projects
- Many of the public service programs the CD funds also receive foundation dollars
- Public funders are seeing the need to fund permanent supportive housing for chronic homeless, employment training tailored to growing sectors, rental assistance is in high demand

Public Facilities

- Emergency water & sewer repairs
- Assist LMI households with street assessment assistance (dependent upon city funding model)
- Repair of flood damaged recreational facilities
- Improve vital neighborhood facilities

Can be accessed at www.DuluthMN.gov/Community-Development

the key take aways that were determined during the public input and data gathering process.

Ongoing Key Takeaways

OMB Control No: 2506-0117 (exp. 07/31/2015)

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

Summary of Housing Needs

Demographics	Base Year: 2000	Most Recent Year: 2010	% Change
Population	86,918	86,066	-1%
Households	35,547	36,482	3%
Median Income	$33,766.00	$41,092.00	22%

Table 5 - Housing Needs Assessment Demographics

Data Source: 2000 Census (Base Year), 2006-2010 ACS (Most Recent Year)

Disability Status	Has one or more of four housing problems					Has none or more of four housing problems				
	0-30% AMI	30-50% AMI	50-80% AMI	>80% AMI	Total	0-30% AMI	30-50% AMI	50-80% AMI	>80% AMI	Total
Households member has a cognitive limitation	780	235	325	75	1415	250	230	235	885	1600
Household member has a hearing or vision impairment	375	350	265	220	1210	75	305	375	1140	1895
Household member has a self-fare or independent living limitation	525	425	240	155	1345	215	280	270	850	1615
Household member has an ambulatory limitation	750	520	320	250	1840	255	465	370	1160	2250
Household member has none of the above limitations	3325	2300	2775	1535	9935	635	795	3135	14210	18775
Source: 2008 to 2010 CHAS										

Disbaled Population Summary from 2008 to 2010 CHAS

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households *	5,490	4,630	6,895	3,425	16,045
Small Family Households *	1,350	960	1,795	1,080	8,610
Large Family Households *	240	285	250	140	890
Household contains at least one person 62-74 years of age	675	545	855	520	2,305
Household contains at least one person age 75 or older	560	1,225	1,235	510	1,100
Households with one or more children 6 years old or younger *	930	605	905	500	1,400
* the highest income category for these family types is >80% HAMFI					

Table 6 - Total Households Table

Data Source: 2006-2010 CHAS

Housing Needs Summary Tables

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	90	70	95	40	295	0	10	10	0	20
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	70	50	0	20	140	0	10	0	0	10
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	65	10	55	60	190	0	65	60	10	135
Housing cost burden greater than 50% of income (and none of the above problems)	2,940	800	225	30	3,995	570	550	465	75	1,660
Housing cost burden greater than 30% of income (and none of the above problems)	355	1,155	1,290	185	2,985	175	470	1,140	525	2,310

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	195	0	0	0	195	90	0	0	0	90

Table 7 – Housing Problems Table

Data Source: 2006-2010 CHAS

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	3,165	930	375	150	4,620	570	635	535	85	1,825
Having none of four housing problems	1,165	1,850	3,195	1,235	7,445	300	1,215	2,790	1,960	6,265
Household has negative income, but none of the other housing problems	195	0	0	0	195	90	0	0	0	90

Table 8 – Housing Problems 2

Data Source: 2006-2010 CHAS

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	880	530	230	1,640	240	220	705	1,165
Large Related	225	90	15	330	8	125	90	223
Elderly	455	360	350	1,165	280	425	385	1,090
Other	1,905	1,085	1,000	3,990	205	280	440	925

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Total need by income	3,465	2,065	1,595	7,125	733	1,050	1,620	3,403

Table 9 – Cost Burden > 30%

Data Source: 2006-2010 CHAS

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	815	205	20	1,040	230	145	205	580
Large Related	160	65	0	225	4	50	25	79
Elderly	355	145	80	580	145	145	90	380
Other	1,780	415	150	2,345	185	210	160	555
Total need by income	3,110	830	250	4,190	564	550	480	1,594

Table 10 – Cost Burden > 50%

Data Source: 2006-2010 CHAS

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	110	10	45	35	200	0	55	10	10	75
Multiple, unrelated family households	0	0	0	25	25	0	20	55	0	75
Other, non-family households	25	50	10	20	105	0	0	0	0	0
Total need by income	135	60	55	80	330	0	75	65	10	150

Table 11 – Crowding Information – 1/2

Data Source: 2006-2010 CHAS

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Households with Children Present	0	0	0	0	0	0	0	0

Table 12 – Crowding Information – 2/2

Data Source Comments:

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

At this time we do not have sufficient data to substantiate a number. There are at least 100 homeless single individuals in need of housing assistance in Duluth. This number represents homeless individuals that were counted during the 2014 Annual Office of Economic Opportunity (OEO) Point in Time Count. There are many more single individuals who are in need of housing assistance.

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

Safe Haven Shelter and the American Indian Community Housing Organization's Dabinool'gan Shelter both provide emergency shelter for victims of domestic violence. Safe Haven serves more than 500 and AICHO serves more than 100 women and children each year. Approximately one third (1/3) of the persons served are single women; two thirds (2/3) are the women and children who make up the families that are served. Also, almost two thirds (2/3) of the women (and children) accessing the domestic violence shelters in Duluth are either of Black/African American or Native American, which is extremely high compared to the general population of Duluth. According to shelter reports, many of the singles and families will return to their previous living situation, some will find market-rate housing in the community and a small amount will access transitional housing or permanent supportive housing units in the community. Others will be assisted in obtaining housing through rapid re-housing assistance.

What are the most common housing problems?

Although substandard housing and overcrowding situations exist, relatively few households are experiencing these conditions. Cost of housing is the main housing problem in Duluth. Of those who had one or more housing problems, renters were the most affected by housing cost, at approximately twice the rate of homeowners. Low and moderate income rental households paying 30% or more of their income for housing numbered 7,125, the same income homeowners paying 30% or more numbered 3,403. For severely cost burdened households, those paying 50% or more of income for housing, there were 4,190 renters and 1,594 homeowners. The lowest income households (0-30% area median income) were the most cost burdened. Households in this income category have a maximum income of $19,300 for a family of 4 persons (2014 HUD Income Guidelines) per year.

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

The 2006-2010 CHAS numbers indicate that approximately one-third of renter households have one or more severe housing problems, while 8.5% of owners have one or more severe housing problems. Of the renter households, the majority (22%) were in the 0-30% median income category.

Duluth's 2013 Housing Indicator Report compared area median incomes to average rents. For a family of four at the 0-30% income category, the affordable housing payment they could make (30% of their annual income) would be $483. The average rent for a two bedroom apartment was $778. The only type of rental housing that would be affordable for this family is an efficiency unit. Households at the 30%-50% median income category could not afford the average mortgage payment for a two bedroom home, but could afford a two bedroom rental unit. Small related households (2-4 members) were more cost burdened, and more severely cost burdened, than large related households (5 or more members) or elderly households.

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

For many years, St. Louis County has funded prevention and homeless assistance in the City of Duluth through the state-funded Family Homeless Prevention and Assistance Program (FHPAP). In 2009, the City began providing prevention and rapid re-housing assistance through the Homeless Prevention and Rapid Re-housing Program (HPRP) stimulus program. Through the HEARTH Act, and with the changes to the Emergency Solutions Grant (ESG) Program, the City began receiving additional ESG funds targeted specifically for prevention and rapid re-housing activities. Community Development staff, along with the Duluth housing and services providers that carry out prevention and Rapid Re-housing assistance, identified Prevention risk factors to be used in targeting households to serve. The risk factors used by the ESG (and FHPAP) programs include:

- Has moved 2 or more times prior to application for assistance because of economic reasons
- Is living in the home of another because of economic hardship
- Has been notified that their right to occupy their current housing will be terminated within 2 weeks
- Lives in a hotel or motel because they have no place else to go
- Is exiting a public-funded institution or system of care
- Household income 30% or below the area median income

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

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

The City does not have a methodology for estimating the number of at-risk households. However, with the ESG funds available for prevention and rapid re-housing assistance, 35% are targeted for prevention assistance and 65% are targeted for rapid re-housing. The FHPAP program targets 65% of the funding for prevention and 35% for rapid re-housing. ESG providers meet bi-monthly to review household need of current applicants and prioritize assistance to families first, then youth, then singles.

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

The high cost of housing, especially for those in the 0-30% income category, creates instability and over-crowding. An increased risk of homelessness is also a by-product.

Discussion

This information shows the following:

- Very low and low income renters are severely cost burden.
- Although substandard housing and overcrowding situations exist, relativley few households are experiencing these conditions.
- Renters were cost burden at approximately twice the rate of homeowners.
- Households at 30-50% median income could not afford the average mortgage payment for a two bedroom home.

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

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

Introduction

Although there are instances of greater need by Hispanic and Black/African American households, the actual number of these households is very low. Therefore, no conclusions can be drawn from the data.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	4,430	975	325
White	3,685	855	220
Black / African American	220	30	70
Asian	109	30	10
American Indian, Alaska Native	270	55	15
Pacific Islander	0	0	0
Hispanic	75	0	0

Table 13 - Disproportionally Greater Need 0 - 30% AMI

Data Source: 2006-2010 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,540	1,510	0
White	3,235	1,380	0
Black / African American	69	0	0
Asian	44	20	0
American Indian, Alaska Native	115	85	0
Pacific Islander	0	0	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Hispanic	25	0	0

Table 14 - Disproportionally Greater Need 30 - 50% AMI

Data Source: 2006-2010 CHAS

*The four housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	2,880	3,790	0
White	2,670	3,540	0
Black / African American	60	85	0
Asian	20	20	0
American Indian, Alaska Native	80	85	0
Pacific Islander	0	0	0
Hispanic	25	40	0

Table 15 - Disproportionally Greater Need 50 - 80% AMI

Data Source: 2006-2010 CHAS

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,050	2,385	0
White	955	2,325	0
Black / African American	30	25	0
Asian	0	40	0
American Indian, Alaska Native	35	0	0

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Pacific Islander	0	0	0
Hispanic	10	0	0

Table 16 - Disproportionally Greater Need 80 - 100% AMI

Data Source: 2006-2010 CHAS

*The four housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than one person per room, 4.Cost Burden greater than 30%

Discussion

In the 0% - 30% area median income (AMI) category, all 75 Hispanic households had one or more housing problem(s). In the 30% - 50% AMI category, all of the Black/African American households (69) and Hispanic (25) had one or more housing problem(s). There was no disproportionately greater need shown in the 50% - 80% AMI category. In the 80% - 100% AMI category, percentages show disproportionate need by Black/African American (30), American Indian (35), and Hispanic (10) households.

The 2008 – 2012 American Community Survey indicates of the 35,862 households in Duluth, there were 250 Hispanic, 609 Black/African American, and 753 American Indian households.

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

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

Introduction

Overall, the American Indian population in the very low income and moderate income categories showed disproportional severe housing need by enough households to be significant. Of the four factors, cost burden over 50% is the single greatest contributor to severe housing problems.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	3,795	1,610	325
White	3,075	1,465	220
Black / African American	220	30	70
Asian	94	45	10
American Indian, Alaska Native	270	55	15
Pacific Islander	0	0	0
Hispanic	65	10	0

Table 17 – Severe Housing Problems 0 - 30% AMI

Data Source: 2006-2010 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,855	3,195	0
White	1,695	2,915	0
Black / African American	29	35	0
Asian	8	55	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
American Indian, Alaska Native	80	115	0
Pacific Islander	0	0	0
Hispanic	15	10	0

Table 18 – Severe Housing Problems 30 - 50% AMI

Data Source: 2006-2010 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	680	5,990	0
White	620	5,585	0
Black / African American	0	145	0
Asian	4	35	0
American Indian, Alaska Native	44	120	0
Pacific Islander	0	0	0
Hispanic	10	55	0

Table 19 – Severe Housing Problems 50 - 80% AMI

Data Source: 2006-2010 CHAS

*The four severe housing problems are:
1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	225	3,220	0

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
White	160	3,120	0
Black / African American	30	25	0
Asian	0	40	0
American Indian, Alaska Native	20	15	0
Pacific Islander	0	0	0
Hispanic	10	0	0

Table 20 – Severe Housing Problems 80 - 100% AMI

Data Source: 2006-2010 CHAS

*The four severe housing problems are: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4.Cost Burden over 50%

Discussion

In the 0%-30% area median income category, 76% or more of persons in a racial or ethnic group would have to have severe housing problems to indicate a disproportionately greater need. In this income group, American Indian / Alaska Native were at 79%, and Hispanic at 86%. The actual number of Hispanic was low, only 65 households. However, the number of American Indian households at 270 was significant. In the 30%-50% income category, only Hispanic had disproportional need, but again, the actual number was small at 15 households. For 50%-80% income, the American Indian group had disproportional need, with a total of 44 households.

In the 80%-100% income category, Black / African American (30 households) American Indian (20 households) and Hispanic (10 households) groups showed greater percentage need than Duluth as a whole. These numbers are not statically significant, therefore it is difficult to determine need.

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

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

Introduction

In the category of households who pay 30%-50% of their income for housing, there were no racial or ethnic groups with disproportionately greater need than all households falling into this category. However, for those paying half or more of their income for housing, three groups showed a higher percentage of need, Black / African American (40% with 265 households), American Indian (41% with 345 households) and Hispanic (44% at 85 households).

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	22,910	6,535	6,055	360
White	21,900	6,050	5,190	255
Black / African American	190	135	265	75
Asian	220	70	105	10
American Indian, Alaska Native	385	105	345	15
Pacific Islander	0	0	0	0
Hispanic	50	60	85	0

Table 21 – Greater Need: Housing Cost Burdens AMI

Data Source: 2006-2010 CHAS

Discussion:

Cost burden appears to parallel disparities in income. The 2008-2012 ACS estimates Duluth's median income at $41,311. Median income of Black / African Americans is estimated at $14,342, American Indians at $15,182, and Hispanics at $30,370.

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

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

There are a few instances of statistical disproportional need (more than 10% of the income category as a whole) by racial or ethnic group in the tables showing housing problems. However, the small number of racial or ethnic households make it difficult to draw any conclusions from these numbers.

In the severe housing problem tables (which include those households paying half or more of their income for housing) there was a significant disproportional need by American Indian households at the 0-30% and 50%-80% median income categories.

The housing cost burden table indicates a disproportional need would be 27% or more for any one racial or ethnic group. For those paying more than half of their income for housing, 40% of Black / African American (265) households are severely cost burdened; 41% of American Indian (345) are severely cost burdened; and 44% of Hispanic (85) are severely cost burdened. The number of Hispanic households (85 of 195) is so small it is not significant. However, both the Black / African American and American Indian numbers are large enough to provide evidence of disproportionally greater need.

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

All of the needs are identified above.

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

In Duluth, there are 10 census tracts that have been consistently higher in percentage of racial groups than the City's average. These census tracts occur in the Lincoln Park neighborhood (census tracts 156, 24, 20); Central Hillside neighborhood;(census Tracts 19, 18, 16) and East Hillside neighborhood (Census tracts 12, 13, 14, 17), located in the oldest part of the City and nearest the downtown area. Of these census tracts, four census tracts (census tract 16, 18, 19, 156) meet HUD's definition of concentration, where the percentage of racial or ethnic persons is 10 percentage points higher than the City overall; These four tracts are located in the Central Hillside and lower portion of the Lincoln Park neighborhoods.

NA-35 Public Housing – 91.205(b)

Introduction

The Housing and Redevelopment Authority, Duluth, Minnesota (HRA) was created by state-enabling legislation and approval of the City of Duluth in l948. The HRA is governed by a seven-member Board of Commissioners, one of which must be a Tenant Commissioner. Commissioner terms of office are staggered five-year terms. All Commissioners are appointed by the Mayor of Duluth with the approval of the City Council.

Currently, the Duluth HRA owns and manages 1,152 units, including six high-rise housing developments (TriTowers, Grandview Manor, King Manor, Ramsey Manor, Midtowne Manor I, and Midtowne Manor II) as well as scattered site properties located throughout the City. These older units are in need of various upgrades. The HRA also owns public housing units located within its three HOPE VI mixed income developments (Harbor Highlands (Phases I, II, and III), Village Place, and The Village at Matterhorn). As recent new construction, these units are in excellent condition.

The HRA also provides HUD funded rental assistance to 1,472 participating households under the Section 8 Housing Choice Voucher program. Participants select privately-owned housing in the jurisdiction that meets the program's payment standards, housing quality standards, and other eligibility factors.

Totals in Use

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	1	27	1,118	1,411	70	1,333	0	0	0

Table 22 - Public Housing by Program Type

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

Data Source: PIC (PIH Information Center)

OMB Control No: 2506-0117 (exp. 07/31/2015)

Characteristics of Residents

Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers				
				Total	Project - based	Tenant - based	Special Purpose Voucher	
							Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	2,436	4,537	10,456	10,419	7,337	10,524	0	0
Average length of stay	0	1	6	5	2	5	0	0
Average Household size	1	1	1	2	1	2	0	0
# Homeless at admission	0	3	4	7	5	2	0	0
# of Elderly Program Participants (>62)	0	2	179	144	4	140	0	0
# of Disabled Families	1	5	414	603	25	574	0	0
# of Families requesting accessibility features	1	27	1,118	1,411	70	1,333	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

Table 23 – Characteristics of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

OMB Control No: 2506-0117 (exp. 07/31/2015)

Race of Residents

Program Type									
Race	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	23	856	1,058	44	1,009	0	0	0
Black/African American	0	3	136	207	11	196	0	0	0
Asian	0	0	58	14	1	12	0	0	0
American Indian/Alaska Native	1	1	60	132	14	116	0	0	0
Pacific Islander	0	0	8	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 24 – Race of Public Housing Residents by Program Type

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Program Type									
Ethnicity	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project - based	Tenant - based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	9	11	0	11	0	0	0
Not Hispanic	1	27	1,109	1,400	70	1,322	0	0	0
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 25 – Ethnicity of Public Housing Residents by Program Type

OMB Control No: 2506-0117 (exp. 07/31/2015)

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

The HRA completed a HUD required Section 504 needs assessment several years ago as required by 24 CFR 8.25 and is in compliance, having a sufficient number of handicapped accessible units within its public housing inventory to meet the needs of existing residents and eligible applicants on its waiting list.

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

Currently there are 1,171 households on the waiting list for public housing units, and 1,380 households on the list for the Section 8 Housing Voucher Choice program. The HRA estimates that it will serve 200 new households in the coming year under the Section 8 program and that it will serve 250 new households under the public housing program. At this time, there is a 93% utilization on the Section Housing Choice Voucher program.

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

The housing need in Duluth is greater than the HRA can address. They partner with other agencies and also administer a tenant-based rental assistance program funded through the City's HOME program.

Discussion

The HRA, as an entity operating both the public housing and Section 8 Housing Choice Voucher Certificate programs, is also required by HUD to prepare and submit an annual Agency Plan as well as a periodic five-year Plan to HUD, and the HRA is further required by HUD to submit these Plans to the City of Duluth for its review and completion of a certification of consistency with the City's Consolidated Plan. This HRA Agency Plan submission includes the HRA's planned capital improvements to its public housing properties for the upcoming year as well as five years out. The Plan also includes any proposed public housing development, and any planned demolition or disposition of public housing. The HRA has no plans to demolish any public housing units or properties in the coming year. It does expect to add an additional scattered site unit under the acquisition and rehab development method in the coming year with HUD Replacement Housing Funding. The agency is also currently undertaking many capital improvements of its public housing properties, including energy-related improvements, at both its high rises and scattered site properties.The City supports the HRA's Family Self-Sufficiency and Section 8 voucher homeownership programs, and is satisfied that residents have access to homeownership opportunities. For a number of years, the City has awarded HOME funds to the HRA for tenant-based rental assistance. This program provides housing vouchers for homeless families and individuals that would otherwise be on the Section 8 waiting list. It allows households that do not currently qualify for HRA's programs to receive a rental voucher, and then work to address their

OMB Control No: 2506-0117 (exp. 07/31/2015)

ineligibility issues, such as past unpaid rent or a too recent criminal conviction. The City intends to continue to set aside HOME funding for tenant-based rental assistance.

In addition to a Tenant representative on the Board of Commissioners, an active Resident Advisory Board reviews and provides input into the HRA's Agency Plan and capital improvement plans. The membership includes the Presidents of the Resident Clubs from each of the six high-rise buildings. These Clubs have regular meetings that serve as venue to talk about HRA policies and procedures. The City is satisfied that residents have meaningful input into the management of public housing. The HRA is a High Performer under HUD's Public Housing Assessment System (PHAS), which grades the HRA on management operations, physical conditions, Capital Fund administration, and financial condition. The HRA is also a High Performer under the Section 8 Management Assessment Program (SEMAP). The HRA will endeavor to retain its High Performer statuses for both programs.

OMB Control No: 2506-0117 (exp. 07/31/2015)

NA-40 Homeless Needs Assessment – 91.205(c)

Introduction:

St. Louis County (SLC) is one of many Continuum of Care (CoC) regions in Minnesota. Duluth is geographically located at the southern end of St. Louis County. There are two entitlement communities in SLC, the City of Duluth and St. Louis County. The City of Duluth has long history of working closing with SLC and homeless housing and service providers to address issues that impact persons who are homeless or at-risk of becoming homeless. In 2007, joint efforts between the City and County, along with homeless housing and service providers produced a business plan to end homelessness , Heading Home St. Louis County(HHSLC), A Ten Year Plan to Prevent and End Homelessness in St. Louis County.

The goal of the Ten-Year Plan to End Homelessness and the Continuum of Care, through a countywide perspective and distribution of resources, is to help homeless individuals, families and youth to be rapidly re-housed in the most permanent housing possible, increase their housing stability and the housing security that goes along with stability, and to prevent new occurrences of homelessness. With the understanding that homelessness is not caused merely by lack of shelter, but rather involves underlying, unmet physical, economic and/or social needs, the supportive services provided for the homeless are designed to meet those needs.

In 2014, City and County collaboration is as strong as ever with continued focus on the HEARTH regulations and related activities to develop a coordinated homeless response system that incorporates new prevention, rapid housing and coordinated assessment activities outlined in the new Emergency Solutions Grant regulations and the new Continuum of Care regulations along with former shelter (including transitional housing) outreach and supportive service activities. The HHSLC Leadership Council is the governing and advisory board that oversees the activities of the 10 Year Plan and other homeless initiatives in Duluth and SLC, including the annual CoC funding competition, the Family Homeless Prevention and Assistance Program (FHPAP) state funding competition in SLC and the Emergency Solutions Grant Program funding process for both Duluth and SLC.

OMB Control No: 2506-0117 (exp. 07/31/2015)

Homeless Needs Assessment

Population	Estimate the # of persons experiencing homelessness on a given night		Estimate the # experiencing homelessness each year	Estimate the # becoming homeless each year	Estimate the # exiting homelessness each year	Estimate the # of days persons experience homelessness
	Sheltered	Unsheltered				
Persons in Households with Adult(s) and Child(ren)	27	266	1,053	793	629	0
Persons in Households with Only Children	0	1	2	0	0	0
Persons in Households with Only Adults	0	105	842	0	0	0
Chronically Homeless Individuals	0	51	194	0	0	0
Chronically Homeless Families	0	61	206	0	0	0
Veterans	0	15	86	0	0	0
Unaccompanied Child	0	1	2	0	0	0
Persons with HIV	0	0	2	0	0	0

Table 26 - Homeless Needs Assessment

Alternate Data Source Name:
2014 OEO Point in Time Count

Data Source Comments: This table was created using both the OEO Point in Time Count and the Annual Subrecipient Reports. Items left blank are becuase no information was collected.

Indicate if the homeless population is: Has No Rural Homeless

OMB Control No: 2506-0117 (exp. 07/31/2015)

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

Data is unavailable for homeless individuals and families, families with children, veterans and their families, and unaccompanied youth for number of persons becoming and exiting homelessness each year and number of days that persons experience homelessness. This is data that is not collected at this time. As our system and processes improve we hope to have this data available in the future. The estimated number exiting homelessness each year is the number of people who participate in CDBG and ESG supported transitional housing programs. This assumes that individuals become stabilized before exiting a transitional housing program and that those in emergency shelter will enter into a transitional housing program. Although our providers are required to report into the Homeless Management Information System (HMIS) we unable to extract data from the system. This prevents us to receive accurate data on the total number of persons becoming and exiting homelessness each year for these specific categories.

OMB Control No: 2506-0117 (exp. 07/31/2015)

Nature and Extent of Homelessness: (Optional)

Race:	Sheltered:	Unsheltered (optional)
White	44	0
Black or African American	56	0
Asian	0	0
American Indian or Alaska Native	30	0
Pacific Islander	0	0
Ethnicity:	**Sheltered:**	**Unsheltered (optional)**
Hispanic	3	0
Not Hispanic	142	0

Alternate Data Source Name:
2014 OEO Point in Time Count
Data Source Comments:

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

During the 2014 Office of Economic Opportunity Point in Time Count there were 52 households with children counted and 1 unaccompanied minor. Furthermore, 14 dependent children were turned away from shelter; data is unavailable on number of households. While 15 veterans were counted during the count, none had children. It is unclear from the data if any of the families counted also were veterans.

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

While the White population makes up about 90% of Duluth's population it only accounts for 45% of Duluth's homeless population. Black or African Americans make up 25% and American Indian or Alaska Native make up 17% of the homeless population. For comparison, both race classifications make up about 2.3% (5.6% total) of the City's population. This shows a strong racial disparity when it comes to housing. The Hispanic/Latino population accounts for about 4% of the homeless population while citywide they make up about 1.4% of the citywide population.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

According to the St. Louis County Point-in-Time (PiT), conducted on January 29, 2014, there were 429 homeless persons (286 households) in SLC, 124 unsheltered and 305 sheltered. A disproportionate number of those were of minority populations (91 or 21% were Black/African American and 86 or 20% were American Indian/Alaska Native). While SLC has reduced the number of chronically homeless persons in recent years, the PiT shows that there are still a high number of chronic singles households that were unsheltered (64 or 15%) or in shelters (32 or 7%) and a number of chronic families also in shelters (9 families). Additional permanent supportive housing (PSH) for families and for youth has been

OMB Control No: 2506-0117 (exp. 07/31/2015)

identified as a high need in Duluth. The City has contributed funding to develop a 44 unit PSH facility for families, which will begin to house chronically homeless families by the end of 2014. The City is committed to contributing funding for the development of a new PSH facility for homeless youth with construction planned to begin in 2015 or 2016.

Persons with serious mental illness, substance abuse, victims of domestic violence and veterans were also disproportionately represented in the PiT. Of the persons counted, 99 (23%) were adults with substance abuse disorder, 83 (19%) were victims of domestic violence, 77 (18%) were adults with a serious mental illness, and 24 (6%) were veterans. Housing for persons identified as the 'hardest to house', those with mental illness, chronic substance abuse, with criminal histories and the chronically homeless is also a high priority in Duluth. The City, collaborating with the two Community Housing Development Organizations (CHDOs) are working to develop multiple supportive housing projects targeted to these populations and homeless youth over the next five years.

Discussion:

While estimates have been pulled from the Point-in-Time Count and ESG/CDBG Quarterly reports it is difficult to obtain comprehensive data on homelessness in the City of Duluth. While every agency that receives CDBG or ESG funds is required to enter data into the Homeless Management Information System, data entered cannot be pulled for Duluth only. HMIS currently is not open to all those entering which causes inaccuracies and double counting. As a person transitions from shelter to a transitional housing program that person may be double counted as both agenices have to enter the participant. As HMIS progresses the City of Duluth is hopeful that better data will be available to help track homeless and allow for a more cohesive system. The St. Louis County Continuum of Care has worked to create a strong collaborative environment between service providers. Its progress is hindered by the lack of openess in HMIS. When HMIS progress the accurracy of data will be benificial to policy development in ESG and the Continuum of Care.

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

Introduction:

Non-Homeless special needs individuals have many options in Duluth for services. Many service providors have leveraged funding sources to create a robust network of resources. The City of Duluth has categorized many of these services as medium or low priority for CDBG funding becuase of the availability of other funding sources.

Describe the characteristics of special needs populations in your community:

The elderly population in Duluth makes up about 14% of the total population according to the 2007 to 2012 American Community Survey (ACS). As a percentage this has declined since the 2006 to 2008 ACS. However, as a total population, in the 2006 to 2008 ACS persons 65 years and over were at 11,349 compared to 11,985 in the 2007 to 2011 ACS. Frail elderly or persons 85 or older have also increased from 2,056 persons in the 2006 to 2008 ACS to 2,333 persons in the 2007 to 2011 ACS.

Special needs also include persons with severe mental illness. Within Duluth, the Human Development Center (HDC) is one organization that provided psychiatric and psychological services to nearly 1,500 adults with serious mental illness in the last year. Persons with mental health continue to be problem in the homeless population. Many service providers who work with homeless continually report working with those who experience extreme mental illness.

There are an estimated 11,570 persons with a disability in Duluth according to the 2007 to 2012 ACS. This is about 13.7% of Duluth's population. Of that, 5,644 are estimated to have a cognitive disability. The disabled population has decreased by 1,000 people from the 2006 to 2008 ACS.

In 2013, the City of Duluth Police Department made 264 arrests for driving under the influence and 745 arrests for narcotics. In 2013, the City of Duluth and the Justice Department were successful in closing down a head shop which sold synthetic drugs. The CHUM Homeless shelter enforces a no drug policy for emergency shelter stays and reported having to remove men and woman from the shelter for synthetic drug use. While no quantitative data was readily available, drug and alcohol use does appear to be a problem in Duluth.

Safe Haven, a battered woman's shelter in Duluth, served 501 new person/ 137 families in 2013 according to the final report for CDBG/ESG funds submitted to the Community Development Division.

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

Duluth will create or preserve supportive housing for individuals and families with special needs. Supportive housing is an accommodating type of housing that either offers or connects occupants to needed support. Funding will be used for new construction, acquisition and rehabilitation of existing buildings for projects that provide supportive housing for persons with special needs. The supportive services that these projects provide to residents will allow persons with disabilities to live independently.

Obstacles to non-homeless special needs primarily include lack of sufficient dollars. State and federal funding has steadily decreased recently and the economic downturn impacts funding for persons with special needs, especially affecting homeownership costs (e.g., increased utilities) and impacting homebuyer programs. Accessible Space, Inc. (ASI) is a statewide housing provider that provides affordable supportive housing for very low-income individuals with disabilities. ASI manages 87 units, both one and two bedroom, in Duluth which provides optional 24-hour Assisted Living Plus Services or allows supportive services from community providers. Units are constructed in a way that promotes accessibility for occupants. Residential Services of Northeast Minnesota (RSI) provides innovative services to support the needs of persons with physical disabilities, developmental disabilities, mental illness, and other needs. RSI provides services that include: foster care (group home and in-home), adult rehabilitative mental health services, medical services, and a variety of other services. The Human Development Center (HDC) in Duluth provides many services that benefit special needs including mental health issues for children and adults, chemical dependency issues, and provides referrals to area resources. The Center for Independent Living provides skill development for individuals to become independent, among a variety of other services that teach, help build relationships, and open doors to achieving independent living.

Listed below is an inventory of supportive housing facilities for low-and-moderate-income, non-homeless persons, including rental units for elderly and disabled persons receiving Section 8 rental assistance and access to support services. Residential and support service programs for people who are developmentally disabled, have a severe and persistent mental illness or are elderly are also included.

Ariel View, Lennox Apartments, Arrowhead House East, Maple Grove Estates, Arrowhead House West, McCarthy Manor, Inc., Carlson Hall, Meridian Apartments, Caromin House, Miketin's Central, Duluth Regional Care Center, Nekton, Inc., Edgewood Vista, Pennel Park Commons, Faith Haven, Pinewood Duluth, Inc., Fresh Start, Reed's Pine Board & Lodging, Gateway Apartments, Reed's Lakeview, Garden House Estates, Residential Services, Inc., Greysolon Plaza, St. Ann's Home, Heritage Haven, Inc., September House, Hillside Homes, Inc., Spirit Lake Manor, Kiminki Homes Summit Manor, Lakeland Shores Apartments, Wesley Residence, Lakeside Manor, Inc., Westwood Apartments, Lakewind, Inc., Woodland Garden Apartments, Lee's Residence

Senior adult services are also provided through the St. Louis County Social Service Department. More than 50 private homes provide long term, short term, respite care, and adult day care. St. Louis County also offers three levels of assisted living in Duluth at HRA's King Manor and Midtowne Manor II. The three levels include general congregate meals with a minimum of one meal per day; the Congregate Housing Service Program (CHSP), housecleaning, laundry, transportation, personal assistance and two meals per day; and the Assisted Living Program which provides 24-hour non-medical supervision, monitoring of medications, and personal care services.

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

In St. Louis County there were reported 8 cases of HIV/AIDS in 2013 according to the Minnesota Department of Health HIV/AIDS Surveillance reports, 2013 found at http://www.health.state.mn.us/divs/idepc/diseases/hiv/stats/2013/inctables2013.html. Given the low estimates of persons in Duluth with HIV/AIDS, and because most of the HIV/AIDS related efforts have focused in the Twin Cities metropolitan area, the subpopulation of persons with HIV/AIDS is a low priority.

Discussion:

The City of Duluth will continue to support applications to other funders (Greater Minnesota Housing Fund, Minnesota Housing Finance Agency, and various foundations) for housing projects that serve persons with special needs. Duluth is a suballocator of Low Income Housing Tax Credits, and works with the State of Minnesota under a joint powers ageement to allocate credits to housing projects in the City.

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

Describe the jurisdiction's need for Public Facilities:

The City of Duluth has determined that the largest need for public facilities is related to upgrading the current public facilities for accessibility improvements, enhancements to neighborhood facilities that expand access to food, and completing repairs due to flood damage.

How were these needs determined?

The City of Duluth generally funds two types of public facility improvements; city-owned buildings and privately owned buildings that provide neighborhood services. City owned buildings are managed under the Duluth Parks and Recreation Master Plan, in which projects and improvements were prioritized. This document is integral in identifying which buildings that serve the neighborhoods are in need of improvements. Many of the buildings that house needed services are in repurposed or aged buildings. These buildings, while still stable and functional, are in need of accessibility improvements to continue to be able to serve all populations well. The following is a link to the Parks and Recreation Master Plan http://duluthmn.gov/parks/master-plan/ . Many of the privately owned facilities that provide neighborhood services to low income residents are in aging buildings that are in need of accessibility and facility upgrades.

Describe the jurisdiction's need for Public Improvements:

Street and sidewalk improvements are high priorities. Street improvements were funded out of a profit sharing agreement with a casino in downtown Duluth. This agreement was not renewed leaving a gap in the City's budget, however a new plan for funding streets has been developed and improvements are planned by the Public Works Department to develop street priorities. The Metropolitan Interstate Council has completed a Sidewalk Inventory, which identifies sidewalks in need of replacement/installation. As new streets and sidewalk projects are initiated there will be a need to help low income residents with the special assessments that property owners are charged when a project is complete.

How were these needs determined?

Street Improvements was something that over a quarter of respondents to the community needs survey said could improve their neighborhood, while 17% of respondents said sidewalk improvements would improve their neighborhood. While conducting in person surveys many extremely low-income and homeless respondents pushed for street improvements

Describe the jurisdiction's need for Public Services:

The City of Duluth has a strong network of public service providers. There is a high need for basic services including medical, food, and clothing services. A network of four congregate food sites and many food pantries help to provide food to thousands of people each year. Many organizations also provide limited medical services, with a community clinic that fully serves the medical and dental needs of low income people. Other public services that are needed in the community include; crime

awareness and prevention, transportation assistance, tenant/landlord mediation, and youth development programs.

How were these needs determined?

The City went through a very thorough needs assessment that worked to identify needs in low income neighborhoods and the general community and received hundreds of responses. The City also regularly analyzes the service numbers for the different programs in Duluth and uses these numbers to reevaluate how programs are funded and prioritized. While access to medical services is a high need within the community, the Affordable Healthcare Act has provided additional funding, reducing the need for CDBG funds in health servivces.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

In an effort to provide current data on the housing market, the City's Community Development division tracks housing data and compiles it in the Housing Indicator Report. A survey of the rental market was conducted and data was collected on 2,195 units in the City of Duluth. The data was aggregated and the results calculated by bedroom type, rent charged, and geographic location. The American Community Survey, St. Louis County Assessor's Office, City of Duluth, and other data sources are tracked annually to determine significant shifts in the housing market and to assist housing providers and developers. Key findings in this report include

- The number of foreclosures in Duluth decreased from 189 in 2012, to 154 in 2013. This is a decrease of 18%.
- The median sales price of a single family home in Duluth increased 1.9% from $145,000 in 2012 to $147,700 in 2013.
- The number of standard (does not include family sales, short sales, forced sales, etc.) home sales jumped from 730 in 2012, to 920 in 2013, about a 26% increase.
- Over 65% of homes in Duluth are over 50 years old.
- The overall rental vacancy rate for the city is 3.7%, which is generally considered very low.
- The market-rate vacancy rate was 4.6% which included non-subsidized units.
- From 2012 to 2013, the average rent in Duluth increased slightly from $716 to $720.

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

Introduction

Based on the 2006-2010 ACS data, there were 38,990 housing units in Duluth, of which 22,029 units (56%) were owner occupied and 14,453 units (44%) were renter occupied.

The 2008-2012 American Community Survey estimates Duluth's rental vacancy rate at 3.7%.

The number of housing units has remained relatively consistent since the 1980's. While there was a slight dip in the 1990 census of 990 units from the previous decade, there has been a slight increase over the past 20 years. In 2010 there were an estimated 38,990 housing units, up from the 1990 count of 34,646 and 2000 count of 35,500. The increase in units despite stagnant population is due to the reduction in household size. In 2000, Duluth's average household size was 2.26 and in 2012 it was estimated at 2.22.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	24,584	63%
1-unit, attached structure	1,070	3%
2-4 units	4,522	12%
5-19 units	2,779	7%
20 or more units	5,105	13%
Mobile Home, boat, RV, van, etc	930	2%
Total	***38,990***	***100%***

Table 27 – Residential Properties by Unit Number

Data Source: 2006-2010 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	9	0%	872	6%
1 bedroom	479	2%	5,324	37%
2 bedrooms	6,308	29%	4,957	34%
3 or more bedrooms	15,233	69%	3,300	23%
Total	***22,029***	***100%***	***14,453***	***100%***

Table 28 – Unit Size by Tenure

Data Source: 2006-2010 ACS

Property Name	Address	Units	Restriction Expires
Duluth	1404 E 3rd St	5	7/12/2015
Norman Apartments	4 N 18th Ave W	8	12/31/2015

John Norman Apartments	1316 E 3rd St	4	12/31/2015
West Duluth Townhomes	6600 Cody St	28	12/31/2016
Harbor View Phase I	101 W Harbor Highlands Dr	44	12/31/2020
Village Place	602 E 5th St	55	12/31/2020
Windwood Townhomes	805 Upham Rd.	70	12/31/2016
	Total	214	

Table 29 - Expiring Affordability Periods

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

Currently, the Duluth HRA owns and manages 1,152 public housing units, including six high-rise housing developments (TriTowers, Grandview Manor, King Manor, Ramsey Manor, Midtowne Manor I, and Midtowne Manor II) as well as scattered site properties located throughout the City. The HRA also owns public housing units located within its three HOPE VI mixed income developments (Harbor Highlands (Phases I, II, and III), Village Place, and The Village at Matterhorn).

The HRA also provides HUD funded rental assistance to 1,472 participating households under the Section 8 Housing Choice Voucher program. Participants select privately-owned housing in the jurisdiction that meets the program's payment standards, housing quality standards, and other eligibility factors.

For a number of years, the City has awarded HOME funds to the HRA for tenant-based rental assistance. This program provides housing vouchers for homeless families and individuals that would otherwise be on the Section 8 waiting list. It allows households that do not currently qualify for HRA's programs to receive a rental voucher, and then work to address their ineligibility issues, such as past unpaid rent or a too recent criminal conviction. The City intends to continue to set aside HOME funding for tenant-based rental assistance.

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

Among the subsidized housing units in Duluth, 214 are currently at risk of losing their affordability status before 2020. This risk is the result of projects that receive Low Income Tax Credit assistance reaching the end of the 15 year compliance period. However, due to 15 year extended affordability agreements with the Minnesota Housing Agency, they are under legal obligation to continue as affordable units for 30 years. Harbor View Phase I was constructed as part of a HOPE VI project, and those 44 units are not at risk of conversion to market rate. The remaining properties were assisted with Low Income Housing Tax Credits, and are covered by restrictive covenants to maintain affordability for a minimum of an additional 15 years. There is presently no reliable information available for expiration of Section 8 contracts in Duluth. Please see the chart identifying affordability periods that will expire within the five-year Consolidated Plan period.

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

According to the 2006-2010 ACS there are 26,010 bedrooms available for rent. According the 2013 Duluth Housing Indicator Report the rental market has about a 3.7% vacancy rate which is strained. This vacancy rate is driven by the lack of affordable housing units for low to moderate income residents. More rental units are required for all income groups to help free supply.

The student population from University of Minnesota Duluth, College of St. Scholastica, and Lake Superior College, has risen from 19,090 in 2008 to 24,463 in 2013. With that growth, students require more on campus and off campus housing. The University of Minnesota Duluth has indicated that they will no longer be supporting on campus living environments directly. This will push more students into the rental market. In response a new project, Blue Stone Apartments, has emerged. This project has built houses primarily for students. Phase I was completed in 2013 while Phase II and III are currently being constructed. This project is in line with the City of Duluth's Higher Education Small Area Plan. However, the project will not create enough units to absorb the entire student population. Furthermore, Duluth citizens reported in the 2013 Community Needs Survey conducted by the Community Development Division that students tend to be first in line for affordable and decent housing forcing families to find more expensive or substandard housing units. For example, a landlord can charge $400 per bedroom, therefore receive $1600 a month for a 4 bedroom house. A family would expect to pay $750 for that same 4 bedroom house.

The average lifespan of a house, according to HUD, is 40 to 50 years with significant annual maintenance. Duluth was reported to have 45.9% of its units built before 1940. This indicates that most of Duluth's housing stock is beyond its average lifespan. According to a market study conducted by Maxfield Research Inc. in 2014 for the Duluth Economic Development Authority and Duluth Housing and Redevelopment Authority, the City of Duluth needs to add 4,400 units to accommodate population growth.

Describe the need for specific types of housing:

Most of Duluth's housing stock requires significant upgrades. As Duluth grows economically, attracting jobs in airplane manufacturing and engineering, population is also projected to grow. A study conducted by Maxfield Research Inc. found that the current housing stock cannot accommodate the growth in population. Issues that were highlighted by the study were the lack of larger and upscale rental units, the underutilization of financing tools to expand housing supply, and the age and maintenance requirements of the existing housing stock. An example of the limitations of an old housing stock was explained to the Community Development staff at an open house in the Lincoln Park Neighborhood. A young couple explained their experience looking to purchase a house in the neighborhood. Most of the houses were built before the 1950's and required many substantial upgrades. Upgrades include weatherization, lead paint mitigation, installation of modern appliances, and general maintenance requirements. While most of the homes were affordable even with the upgrades, they could not secure a loan from the bank. The value of the upgrades would not have been reflected in the houses market value thus creating a value gap at which a commercial bank would not support.

With the need for 4,400 new housing units by 2019 the City of Duluth believes that an all of the above approach to new housing is necessary. There needs to be an increase in supply of all types of housing units including rental, owner occupied, affordable, and market rate.

Discussion

The housing market analysis shows the following:

-Public and housing choice voucher programs can not meet the demand for affordable housing.

-Duluth has a low 3.7% vacancy rate.

-Students drive up the cost of rental units and compete with families for single family houses.

-Given the age of Duluth's housing stock, rehab will continue to be a focus so as to preserve existing homes.

-New construction will be needed to increase the supply of all types of housing.

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

Introduction

Current housing market data is taken from the "City of Duluth 2013 Housing Indicator Report - Released may 23, 2014." This report is published annually, and is available on the City of Duluth's website at http://www.duluthmn.gov/media/211764/2013Housing-Indicator-Report-Final.pdf.

- Households that are in the Extremely Low Income (30% or less of area median income) bracket, based on paying 30% of income towards housing, cannot afford anything other than an efficiency unit in Duluth.

- Households that are at or below 50% of area median income cannot afford a 2+ bedroom house to purchase but can afford a 2 bedroom unit to rent.

- Households that are near the 80% of area median income can afford to purchase or rent 2 and 3 bedroom homes in Duluth.

- While there is increase need for affordable housing for extremely low income residents, using federal assistance has helped St. Louis County provide at least some relief to about half of those who need it.

Cost of Housing

	Base Year: 2000	Most Recent Year: 2010	% Change
Median Home Value	80,700	151,300	87%
Median Contract Rent	413	624	51%

Table 30 – Cost of Housing

Data Source: 2000 Census (Base Year), 2006-2010 ACS (Most Recent Year)

Rent Paid	Number	%
Less than $500	4,757	32.9%
$500-999	7,908	54.7%
$1,000-1,499	1,149	8.0%
$1,500-1,999	341	2.4%
$2,000 or more	298	2.1%
Total	***14,453***	***100.0%***

Table 31 - Rent Paid

Data Source: 2006-2010 ACS

Affordability Based On Duluth's 2013 Median Income

2013 HUD Income Definitions	Maximum Affordable Housing Payment (30% of Income)	Average Rent 2/Bedroom	Payment Average 2/Bedroom House ($140,353)	Average Rent 3/Bedroom	Payment Average 3/Bedroom House ($169,021)	Affordability GAP*
Extremely Low 30% of Median Income $19,300	**$483**	**$778**	**$967**	**$907**	**$1,180**	All standard housing unaffordable.
Low 50% of Median Income $32,150	**$804**	**$778**	**$967**	**$907**	**$1,180**	Could only afford a 2 bedroom rental unit.
Low-Moderate 80% of Median Income $51,450	**$1,286**	**$778**	**$967**	**$907**	**$1,180**	Could afford several housing options.

*Affordability Gap is measured by taking the highest income level of each category, its equivalent maximum affordable housing payment (30% of income), and then comparing that to the expected housing payment.

Affordability Based on Duluth's 2013 Median Income

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	1,235	No Data
50% HAMFI	4,040	1,255
80% HAMFI	10,190	4,480
100% HAMFI	No Data	7,190
Total	***15,465***	***12,925***

Table 32 – Housing Affordability

Data Source: 2006-2010 CHAS

Monthly Rent

Monthly Rent ($)	Efficiency (no bedroom)	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Fair Market Rent	459	552	725	945	1,052
High HOME Rent	459	552	725	945	1,052
Low HOME Rent	459	552	701	810	903

Table 33 – Monthly Rent

Data Source: HUD FMR and HOME Rents

Is there sufficient housing for households at all income levels?

The Urban Institute, a nonpartisan economic and social policy research group, has developed a database for all counties in the United States that determines the affordability gap. As part of their Housing Assistance Matters Initiative the Urban Institute compiled American Community Survey Data and HUD data to determine the lack of affordable housing for extremely low income households (HUD provided guidelines) for the years 2000, 2006 and 2012. Nationwide they found in 2012 that there were 11.5 million extremely low-income renter households but only 3.3 million affordable and available rental units. The discrepancy translates into 29 affordable and available units for every 100 extremely low-income renter households. These numbers include federally assisted housing. When the federal housing assistance is taken out of the comparison there are only 111,318 units that are affordable and available. This results in only 1 unit per 100 households nationwide that are affordable and available.

Duluth's population makes up approximately half of St. Louis County, and countywide data is reflective of numbers in the City. St. Louis County is similar to the nation when federally assisted housing is taken out of the analysis. St. Louis County has only 83 units available that are affordable to the 7,430 extremely low income households or 1 per 100 households. However, when federally assisted housing is included there are estimated 3,753 affordable and available units. This equates to 51 units of affordable housing for 100 extremely low income households in St. Louis County. CHAS data shows Duluth with 4,980 extremely low income households, with 1,235 units available, or a gap of 3,745 households unable to find affordable rental units.

There was not a huge fluctuation in affordable housing in St. Louis County between 2000 to 2006 to 2012. With federally assisted housing removed there were 0 units that were affordable to extremely low income residents in both 2000 and 2006. With federally assisted housing there were 2,775 affordable units or 50 units per 100 households units in 2000, and 3,214 affordable units or 56 units per 100 households in 2006. The biggest contrast is the rise in extremely low income population. From 2000 to 2006 to 2012 the extremely low population in St. Louis County increased from 5,560 to 5,761 to 7,430 respectively. A key take away is St. Louis County's ability to leverage federal funds to increase affordable housing units when the need has increased.

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

A household in Duluth paying 30% of their income for housing would need to earn $42,120 annually to afford a $153,680 home – the 2013 average value of an owner occupied single family home in Duluth. The average wage in Duluth for 2013 was $40,196, which would equate to a $146,270 dwelling unit. The average selling price for a two-bedroom home in Duluth in 2013 was $146,270, which equates to an approximate $1,005 monthly payment. For a three-bedroom home, the average 2013 price was $169,021, which would have an approximate monthly payment of $1,180. The mortgage payments in these examples assume a 30-year mortgage, 5% down, 4.5% interest rate, taxes, and estimated

OMB Control No: 2506-0117 (exp. 07/31/2015)

insurance. Homeownership has become somewhat more affordable than in years past due to the current lower interest rates.

In the rental market an individual must earn an income of $28,800 to afford the average market rate rent of $720 per month. To afford an average two bedroom rent of $778 the household would need to earn $31,160. The average rent for a 3 bedroom apartment in 2013 was about $907 a month. For the apartment to be considered affordable the household would require an income of $36,280, which is about $1,000 more than in 2012.

In the affordability table above, the median income for a family of four persons is listed for each income category, from the extremely low-income category to the moderate income category. The affordable housing payment has then been compared to the actual cost a household could expect to pay for average rent for two- and three-bedroom apartments and mortgage payments for two- and three-bedroom homes. The table indicates that households that are at the top end of low-moderate income (50% to 80% of the median income) would be able to afford housing, but households with either extremely low income or low income would have a significant affordability gap to overcome.

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

The City of Duluth conducts an annual market rate rental survey. A database is created with information on property managers and rental properties. Property owners and managers are surveyed on rental rates and vacancy rates. The data is aggregated and the results are calculated by bedroom type, rent range, and geographic location. In 2013, the responses included 2,195 units which account for approximately 15.1% of the total market rate rental units in Duluth. Of the returned responses 50% were for units located in buildings with 25 or more units, 23% were for units in buildings with 10 to 24 units, 15% were for units located in buildings with 4 to 9 units, and 11% were for triplexes. Subsidized and income restricted rental units are not surveyed so that we can determine the unrestricted market rate price per unit size. The responses include information on studio apartments (231 units), one-bedroom (970 units), two-bedroom (839 units), three-bedroom (125 units), four-bedroom (23 units), and other unit types (7 units).

HOME / Fair Market Rents are calculated based on the Duluth/Superior Metropolitan Statistical Area (MSA), which includes Duluth and St. Louis County, as well as the City of Superior and Douglas County in Wisconsin. The MSA encompasses large rural areas that have significantly lower rents than the urban areas. Therefore, HOME / Fair Market Rents are skewed below the actual market rents. The average market rents from the Housing Indicator Report survey showed gaps for all rental unit sizes in comparison to the published HOME rents. For efficiency units, the shortfall is $18, one-bedroom $150, two-bedroom $69, three-bedroom $32, and four-bedroom $226 per month.

The Duluth HRA conducted a local survey in a successful effort to increase Housing Voucher rent limits to more closely match actual market conditions in Duluth. Therefore, the HRA's "exception rents" are higher than the published FMRs. For HOME funded rental projects, owners can't accept the full Housing Voucher payment, only that amount under the HOME rent limit. Tenants are unaffected, as their portion of the rent is based solely on a percentage of their income. This is a disincentive to housing developers to participate in the HOME Program due to the reduction in operating income. To date, only non-profit housing developers have utilized HOME funding for the creation of affordable rental units.

OMB Control No: 2506-0117 (exp. 07/31/2015)

Discussion

- Households that are in the Extremely Low Income (30% or less of area median income) bracket, based on paying 30% of income towards housing, cannot afford anything other than an efficiency unit in Duluth.
- Households that are at or below 50% of area median income cannot afford a 2+ bedroom house to purchase but can afford a 2 bedroom unit to rent.
- Households that are near the 80% of area median income can afford to purchase or rent 2 and 3 bedroom homes in Duluth.
- While there is increase need for affordable housing for extremely low income residents, using federal assistance has helped St. Louis County provide at least some relief to about half of those who need it.

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

Introduction

The average lifespan of a house, according to HUD, is 40 to 50 years, without significant annual maintenance. According to the most recent American Community Survey (2008-2012), about half of Duluth's units were built before 1940. This is significantly higher than Minnesota, where the percent of housing units built before 1940 in the state is 18.1%, and 13.9% for the nation. Properties built prior to 1979 are at risk of containing lead-based paint. In Duluth, 85% of the owner-occupied housing stock, and 81% of the rental stock, were built before 1980. The table below shows about a quarter of owner-occupied homes, and over half of rental units, have at least one housing condition.

Definitions

Duluth's definitions follow:

Standard Housing Condition Housing which in initial construction quality and current condition is safe, fit for human occupancy, and is structurally sound according to Section 108 of *Duluth Housing Maintenance Code, Chapter 29A.*

Substandard Housing Condition but Suitable for Rehabilitation Any housing unit which does not meet the definition for standard housing condition, or contains lead paint, or could be on the City of Duluth Condemned for Human Habitation, but is not on the City of Duluth Condemned for Demolition list.

Substandard Housing Condition Any housing units that are listed on the City of Duluth Condemned for Demolition list.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	5,258	24%	7,465	52%
With two selected Conditions	63	0%	365	3%
With three selected Conditions	0	0%	38	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	16,708	76%	6,585	46%
Total	***22,029***	***100%***	***14,453***	***101%***

Table 34 - Condition of Units

Data Source: 2006-2010 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,212	6%	1,103	8%
1980-1999	1,968	9%	1,730	12%
1950-1979	6,937	31%	4,706	33%
Before 1950	11,912	54%	6,914	48%
Total	***22,029***	***100%***	***14,453***	***101%***

Table 35 – Year Unit Built

Data Source: 2006-2010 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	18,849	86%	11,620	80%
Housing Units build before 1980 with children present	405	2%	7,860	54%

Table 36 – Risk of Lead-Based Paint

Alternate Data Source Name:
2008 - 2012 American Community Survey
Data Source Comments:

Age of Duluth's Housing Stock and Predicted Occurrence of Lead-Based Paint			
Year Built	**Number of Units**	**Percentage of Units with Lead-Based Paint**	**Number of Lead-Based Paint Units**
Post 1980	6,304	0%	0
1960 - 1979	6,634	62%	4,113
1940 - 1959	7,723	80%	6,178
1939 or Earlier	17,529	90%	15,776
Total	38,190		26,068

Sources: U.S. Census Bureau, 2008 – 2012 American Community Survey

Lead-Based Paint by Age of House

Vacant Units

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	198	15	213
Abandoned Vacant Units	14	0	14

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
REO Properties	0	0	0
Abandoned REO Properties	0	0	0

Table 37 - Vacant Units

Alternate Data Source Name:
2014 Condemnation List City of Duluth

Need for Owner and Rental Rehabilitation

The majority of Duluth's housing stock was built more than 50 years ago. 54% of owner occupied and 48% of rental units were built before 1950. Furthermore, units built before 1980 make up 85% of owner occupied and 80% of rental units. This means over 80% of housing units in Duluth are at least 35 years old. The majority of aging housing stock is located in the older, core neighborhoods of Duluth, where there is also a higher concentration of low to moderate income people. The average lifespan of a house, according to HUD guidelines, is 40-50 years without significant annual maintenance. When older housing stock lacks routine maintenance, it will become substandard. Census data indicates that the percentage of renters and homeowners experiencing housing problems correlates closely with household income. Housing repair and rehabilitation issues that are not addressed will lead to more condemned housing units that are unsafe for habitation. Given the age of housing stock in Duluth, rehabilitation will continue to be an important focus.

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

Lead-based paint was banned from residential use in 1978. In spite of this, lead poisoning remains a serious problem, especially in older housing units that tend to have paint with higher concentrations of lead, more coats of paint, and larger areas covered with lead-based paint.

Data from the U.S. Census Bureau's 2008 – 2012 American Community Survey indicates that two-thirds of Duluth's homes are 60 years old or older, compared to one-third of homes statewide. Of Duluth's housing stock, 90% was built before lead-based paint was removed from the market. According to HUD's 1991 report to the U.S. Congress, an estimated 90% of homes built before 1940 contain lead-based paint, as do 80% of those built between 1940 and 1959, and 62% between 1960 and 1978. The following table provides an estimate of the number of homes in Duluth containing lead-based paint.

Of the 26,068 homes with lead-based paint, approximately 10,427 are occupied by low- to moderate-income households, including 3,645 households at or below poverty level. The default data that populated the "Risk of Lead-Based Paint Hazard" table is incorrect for the owner-occupied housing units built before 1980 with children present.

Discussion

While the housing stock in Duluth is livable it is old and in need to renovation. While most homes have access to complete plumbing facilities and kitchen facilities there is still a risk of Lead Paint Based Hazards. In many neighborhoods, houses are in need of repair but ability to obtain loans for renovation from commercial banks is limited.

While the housing stock in Duluth is livable it is old and in need to renovation. While most homes have access to complete plumbing facilities and kitchen facilities there is still a risk of Lead Paint Based Hazards. In many neighborhoods, houses are in need of repair but ability to obtain loans for renovation from commercial banks is limited. HOME Program after rehab value limits are not adjusted to the size of single family homes. Therefore it is difficult to use HOME funds to rehab three or more bedroom homes to accommodate families.

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

Introduction

The supply of public housing units is adequate. There is continually a waiting list for public housing but not at a list that is neither unmanageable nor unordinary. The Housing and Redevelopment Authority manages the public housing.

Totals Number of Units

Program Type									
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	24	1,152	1,467	77	1,390	0	0	0
# of accessible units									
*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition									

Table 38 – Total Number of Units by Program Type

Data Source: PIC (PIH Information Center)

Describe the supply of public housing developments:

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

The public housing units in Duluth are in good condition. In 2011 Harbor Highlands replaced a large run down public housing complex. The new public housing units are in a new urbanist style design and offer a variety or housing options.

OMB Control No: 2506-0117 (exp. 07/31/2015)

Public Housing Condition

Public Housing Development	Average Inspection Score

Table 39 - Public Housing Condition

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

Most of the HRA's public housing units are older, but the HRA is utilizing various resources to keep the units in good repair through its wise use of its annual HUD Capital Fund grant, occasional use of energy performance contracting, and use of general obligation bond funded loans provided by the Minnesota Housing Finance Agency, when appropriated by the state legislature. The HRA has also used its local levy resources to augment such funds when needed. The HRA also intends to submit an application for the Rental Housing Assistance Demonstration (RAD) program for some selected public housing units, which would provide additional funding for public housing capital improvements.

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

The HRA has no plans to demolish any public housing units or properties in the coming year. It does expect to add an additional scattered site unit under the acquisition and rehab development method in the coming year with HUD Replacement Housing Funding.

The agency is also currently undertaking many capital improvements of its public housing properties, including energy-related improvements, at both its high rises and scattered site properties.

Discussion: na

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

Introduction

As the largest metropolitan city in St. Louis County, Duluth has a proportionally larger population of homeless individuals and families than the other parts of St. Louis County. As such, Duluth has developed a strong network of housing and programs that serve the homeless. The City is just beginning to implement Coordinated Access and Assessment (CA) into their current system of 'No Wrong Door'. With the implementation of CA, entry into the homeless system will be facilitated by a pre-screening process through a 211 referral and access and assessment through multiple doors—CHUM Emergency Shelter, the American Indian Community Housing Organization's Dabinoo'lgan (DV) Shelter or their American Indian Housing Resource Center, the Safe Haven (DV) Shelter, The Salvation Army (supportive service program) or the Life House Center (Youth).

Prevention and diversion, and access to transitional housing, permanent supportive housing, Tenant-Based Rental Assistance Vouchers, and other HUD supported housing will be facilitated through the Coordinated Access and Assessment System and directed to the appropriate type of housing based on their assessment scores. Data in table MA-19 reflects the numbers of beds available for homeless populations in Duluth and the number of beds for targeted populations.

Individual and families who are homeless or at-risk of homelessness can access the programs and supportive services described above at the CHUM shelter, located in the Central Hillside CDBG Target neighborhood or the American Indian Community Housing Organization, also located in the Central Hillside neighborhood. People can access the same types of services at the Salvation Army, located in the Lincoln Park CDBG neighborhood located in the western part of the City. Homeless and at-risk youth can access similar programs and services tailored to the unique needs of youth at the Life House Center in the Central Hillside neighborhood.

Housing and supportive services tailored specifically for veterans and their families who are homeless or at risk of homelessness are available through the Minnesota Assistance Council for Veterans (MACV), a statewide veterans' service agency with offices and housing facilities in Duluth.

OMB Control No: 2506-0117 (exp. 07/31/2015)

Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	52	0	126	270	44
Households with Only Adults	78	32	14	131	0
Chronically Homeless Households	0	0	0	33	0
Veterans	0	0	9	17	0
Unaccompanied Youth	0	0	22	0	7

Table 40 - Facilities and Housing Targeted to Homeless Households

Alternate Data Source Name:
Saint Louis County Continuum of Care
Data Source Comments:

Additional Text Related to Facilities

The facilities identified above provide a wide range of supportive services to homeless persons and those at-risk of becoming homeless. In addition to the emergency night-shelter, the CHUM congregate facility operates as a day-shelter where people can access additional support services such as hot meals, shower and laundry facilities, nursing services and health education, case management and housing search assistance, employment assistance and social security advocacy. In addition, CHUM provides street outreach and coordinates efforts with the Duluth Police Department,

St. Louis County Health and Human Services, called 'Assertive Community Treatment' (ACT), provides outreach to people with mental illness and substance abuse and those identified as long-term and chronically homeless using a 'harm reduction' engagement model.

Life House and Lutheran Social Services (LSS) provide street outreach to homeless and at-risk youth and coordinate a similar outreach program called T-ACT ('Teen- Assertive Community Treatment'). Life House operates a Drop-In Center that provides supportive services for homeless and

OMB Control No: 2506-0117 (exp. 07/31/2015)

at-risk youth, including meals, education and employment assistance, mental health assistance, housing search assistance and case management.

Duluth has 49 shelter beds targeted for women fleeing domestic violence, and their children. Of those, ten (10) are prioritize for Native American women. The 'Duluth Model': a Coordinated Community Response to Domestic Violence, was developed in Duluth. It is a partnership between Domestic Abuse Intervention Program (DAIAP), and criminal justice agencies in the City of Duluth and St. Louis County. The 'Duluth Model' recently won an international prize—the 2014 Future Policy Award for Ending Violence against Women and Girls (the Gold Award). It is the first humanitarian policy to be honored in the history of this award. The 'Duluth Model' won the award for because the program prioritizes the safety and autonomy of survivors while holding the perpetrators accountable through community-wide coordinated response, that includes the unique partnership between non-profit and government agencies. This approach as inspired violence protection law implementation and the creation of batterer intervention programs across the United States and throughout the world.

OMB Control No: 2506-0117 (exp. 07/31/2015)

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

The City of Duluth supports a wide array of mainstream services. The City of Duluth supports the Duluth at Work program through its CDBG funding. This is an employment program to help those facing barriers to employment. The Duluth at Work program mostly targets extremely low income individuals who are often not deemed to be work ready by the workforce center. The Duluth at Work program brings together several organizations who share best practices in job training, employer relationship building, and screening. The participants in the Duluth at Work program often cannot find assistance through the more traditional workforce center. These two programs work together to help low income individuals gain job readiness skills and job training. They help connect participants to employers. The Duluth at Work program uses benchmarks to reward agencies whose participants remain employed for 2 years, gain a 25% increase in wages, and are employed full time. These 3 goals help the participant gain the necessary experience to obtain a higher paying job in the future.

The City of Duluth also supports several food access programs through its CDBG program. The Duluth Hunger project is a group consisting of the Salvation Army, Damiano Center, and Churches United in Ministry. These three organizations work to provide meals and operate food shelves. They coordinate with Second Harvest food pantry. Meals are served in a manner to prevent overlap and in geographically dispersed areas in order to provide greater access. There is also a medical food shelf for those individuals with dietary restrictions.

Access to health care is something that is evolving in Duluth. The CDBG program has funded for many years the Lake Superior Community Health Center. This facility has both doctors and dentists. The affordable health care act has helped many low income residents obtain access to health care. Lake Superior Community Health Center and several other partners set up navigators to help low income individuals and households gain access to no cost/ low cost health insurance. Other health agencies that help connect individuals to health care include St. Louis County's Health and Human Services department, Lutheran Social Services, and Community Action Duluth. Furthermore, mental health services are provided by the Human Development Center and Saint Louis County Health and Human Services. Case Management and help with benefits applications, crisis assistance, day treatment, employability, and medication monitor are a few of the services that are available.

The Minnesota Assistance Council for Veterans provides services for veterans. It helps veterans to stabilized living through rent/mortgage assistance and temporary housing, sustainable, living wage employment through training and placement, referral and resolution to civil legal issues, life skills education, money management skills training and financial plan development.

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

The agencies that provide housing and support services targeted to homeless individuals and families in Duluth include:

Emergency Shelter

- CHUM Emergency Shelter--44 congregate bed-facility for single men and women and 4 off-site family units
- Safe Haven Shelter for Battered Women--39 beds for single women and women- headed households fleeing domestic violence
- American Indian Community Housing Organization--10 beds for single women/ women-headed families fleeing domestic violence (Native American preference)
- Union Gospel Mission—11 units for single adults who are chronically homeless
- Loaves & Fishes' –8 units for singles and families

Transitional Housing

- American Indian Community Housing Organization-5 units for women-headed families and single women (Native American preference)
- Center City Housing Corporation-21 units for families and single adults and 7 units targeted for youth (services for youth provided by Life House)
- Life House- 4 housing vouchers targeted for homeless youth
- Lutheran Social Services—6 units for homeless youth
- The Duluth Veterans' Place—9 units for homeless veterans
- The Salvation Army –16 units for families

Permanent Supportive Housing

- American Indian Community Housing Organization—29 units for families and 20 vouchers for long-term homeless families (Native American preference)
- Center City Housing Corporation—16 units for families and single women, 6 vouchers for long-term homeless families, and 44 new PSH units for families (will be operating by January 2015).
- MACV—12 units for homeless veterans and 5 VASH vouchers.
- YWCA—7 units for homeless youth families (single mothers with children)
- Lutheran Social Services—5 units of permanent supportive housing are currently under development (expected to be operating in 2016 or 2017)
- The Housing and Redevelopment Authority (HRA) of Duluth provides 49 Shelter+ Care vouchers—CHUM and the Human Development Center provide the services.

Permanent Housing

- The HRA provides 111 Single-Room-Occupancy (SRO) vouchers for chronic and hardest to house single adults in facilities owned by Center City Housing and the Union Gospel Mission.

- CHUM—5 units of Supportive Housing operated by funds provided by the Duluth 'Churches United in Ministry'.

One of the objectives in the SLC Continuum of Care Plan is to increase progress towards ending chronic homelessness. The Plan established a baseline in 2013 of 399 permanent supports beds not dedicated for use by the chronically homeless, but available for occupancy (all of SLC) and a total of 114 beds dedicated for the chronically homeless. With a focus on ending chronic homelessness over the next few years, homeless PSH providers in Duluth and SLC have set an intentional goal to prioritize 95% of the PSH beds not dedicated for use by chronically homeless, but available through annual turnover, for use by the chronically homeless.

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

Introduction

Special needs individuals have many options in Duluth for services. Many service providors have leveraged funding sources to create a robust network of resources. The City of Duluth has categorized many of these services as medium or low priority for CDBG funding due to the availability of other funding sources.

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

The elderly population in Duluth makes up about 14% of the total population according to the 2007 to 2012 American Community Survey (ACS). As a percentage this has declined since the 2006 to 2008 ACS. However, as a total population, in the 2006 to 2008 ACS persons 65 years and over were at 11,349 compared to 11,985 in the 2007 to 2011 ACS. Frail elderly or persons 85 or older have also increased from 2,056 persons in the 2006 to 2008 ACS to 2,333 persons in the 2007 to 2011 ACS.

Special needs also include persons with severe mental illness. Within Duluth, the Human Development Center (HDC) is one organization that provided psychiatric and psychological services to nearly 1,500 adults with serious mental illness in the last year. Persons with mental health continue to be problem in the homeless population. Many service providers who work with homeless continually report working with those experience extreme mental illness.

There are an estimated 11,570 persons with a disability in Duluth according to the 2007 to 2012 ACS. This is about 13.7% of Duluth's population. Of that, 5,644 are estimated to have a cognitive disability. The disabled population has decreased by 1,000 people from the 2006 to 2008 ACS.

In 2013, the City of Duluth Police Department made 264 arrests for driving under the influence and 745 arrests for narcotics. In 2013, the City of Duluth and the Justice Department were successful in closing down a head shop which sold synthetic drugs. The CHUM Homeless shelter enforces a no drug policy for emergency shelter stays and reported having to remove men and woman from the shelter for synthetic drug use in the shelter. While no quantitative data was readily available drug and alcohol use does appear to be a problem in Duluth.

Safe Haven, a battered woman's shelter in Duluth, served 501 new person/ 137 families in 2013 according to the final report for CDBG/ESG funds submitted to the Community Development Division.

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

One of the goals outlined in Heading Home St Louis County, the Ten-Year Plan to End Homelessness was to establish uniform discharge protocols and procedures that prevent people being released from county institutions from being discharged into homelessness. The Adult Protocol Business Plan, or *Discharge Plan,* was completed in 2008. It outlines the transition process steps, based on an evidence-

OMB Control No: 2506-0117 (exp. 07/31/2015)

based model called Critical Time Intervention. A standardized assessment tool was developed and is being used by discharging entities in Duluth and throughout St. Louis County upon client admission to identify those at risk of homelessness, specific services to be offered to all clients and additional services offered to at-risk clients. The Plan also outlines collaborative partner roles and responsibilities, including coordination and information sharing. Monthly meetings are held to discuss discharge issues; those attending are County staff, persons representing veterans, corrections, prison ministry, homeless housing and services agencies, hospital emergency staff and staff for the Community Offender Re-Entry Program (CORP). CORP staff assist ex-offenders in their transition from incarceration to the community through support, employment services, mentoring housing search and assistance and case management.

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

The Esmond Building in Lincoln Park is currently home to many people in need of permanent supportive housing. The City of Duluth is working with Center City Housing Corporation to find a location for a new permanent supportive housing facility. This will prevent the individuals from becoming homeless and provide the proper services that the population needs.

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

The Esmond Building in Lincoln Park is currently home to many people in need of permanent supportive housing. The City of Duluth is working with Center City Housing Corporation to find a location for a new permanent supportive housing facility. This will prevent the individuals from becoming homeless and provide the proper services that the population needs.

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

Negative Effects of Public Policies on Affordable Housing and Residential Investment

- Lack of annual budgeted funding to demolish or repair buildings condemned for demolition or human habitation, allowing blight to persist in LMI neighborhoods.
- The City requires assessments placed on vacant lots where structures have been demolished be paid by any new owner, rendering otherwise buildable infill sites financially infeasible for redevelopment.
- "One-for-one" replacement requirements when structures are demolished on 25 front foot unbuildable lots.
- Sewer utility fees and other utility hook-up fees increase the cost of construction of affordable single-family homes.
- Limited Minnesota Housing funding for rehab of aging single-family structures occupied by LMI households, which leads to higher maintenance costs.
- Lack of a policy to require improvements to foreclosed properties in LMI neighborhoods that are on the vacant property register.
- Inflexible policies related to Comfort System's energy improvement programs that limit access to loans by LMI households, including refusal to subordinate when first mortgages are refinanced.
- Minnesota State Historic Preservation Office policies that create additional rehab costs, such as wooden windows and doors repaired rather that replaced by new historically designed materials.
- Outdated historic property references that trigger SHPO review of affordable housing rehab projects on buildings not eligible for listing, which increases costs and delays.
- Lack of direction from City Administration to enforce existing rental license program.
- No education requirement for owners and/or managers to secure a rental license.
- Lack of direction from City Administration to enforce housing maintenance code.
- Lack of energy standards for existing housing stock that result in higher costs for LMI households living in older homes that are energy inefficient.
- Housing & Redevelopment Authority policies that prevent LMI households with poor rental histories or criminal backgrounds from securing assisted housing.
- HUD HOME Program after-rehab value limit based on 95% of median sales price from the extensive Duluth/Superior metropolitan statistical area, and the value limit not adjusted for homes with three or more bedrooms occupied by larger families.
- HUD HOME Program ruling that disallows use of local exception rents in favor of fair market rents in HOME assisted affordable rental housing.

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

Introduction

Economic Development Market Analysis

Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	100	19	0	0	0
Arts, Entertainment, Accommodations	4,077	5,573	15	12	-3
Construction	1,032	1,643	4	3	-1
Education and Health Care Services	9,378	16,919	34	36	2
Finance, Insurance, and Real Estate	1,951	2,396	7	5	-2
Information	475	759	2	2	0
Manufacturing	1,565	2,588	6	5	-1
Other Services	1,413	1,957	5	4	-1
Professional, Scientific, Management Services	1,829	2,761	7	6	-1
Public Administration	36	19	0	0	0
Retail Trade	4,039	5,141	15	11	-4
Transportation and Warehousing	894	6,361	3	13	10
Wholesale Trade	866	1,366	3	3	0
Total	27,655	47,502	--	--	--

Table 41 - Business Activity

Data Source: 2006-2010 ACS (Workers), 2010 Longitudinal Employer-Household Dynamics (Jobs)

OMB Control No: 2506-0117 (exp. 07/31/2015)

Labor Force

Total Population in the Civilian Labor Force	46,415
Civilian Employed Population 16 years and over	42,629
Unemployment Rate	8.16
Unemployment Rate for Ages 16-24	27.52
Unemployment Rate for Ages 25-65	4.16

Table 42 - Labor Force

Data Source: 2006-2010 ACS

Occupations by Sector	Number of People
Management, business and financial	9,575
Farming, fisheries and forestry occupations	1,819
Service	6,137
Sales and office	6,468
Construction, extraction, maintenance and repair	2,956
Production, transportation and material moving	1,647

Table 43 – Occupations by Sector

Data Source: 2006-2010 ACS

Travel Time

Travel Time	Number	Percentage
< 30 Minutes	36,039	90%
30-59 Minutes	3,209	8%
60 or More Minutes	1,000	2%
Total	***40,248***	***100%***

Table 44 - Travel Time

Data Source: 2006-2010 ACS

Education:

Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Less than high school graduate	899	156	850
High school graduate (includes equivalency)	6,211	569	3,067
Some college or Associate's degree	10,885	700	2,784

Educational Attainment	In Labor Force		
	Civilian Employed	Unemployed	Not in Labor Force
Bachelor's degree or higher	11,942	248	1,866

Table 45 - Educational Attainment by Employment Status

Data Source: 2006-2010 ACS

Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	21	86	134	292	658
9th to 12th grade, no diploma	1,302	280	279	834	1,381
High school graduate, GED, or alternative	3,389	2,512	1,972	5,363	4,223
Some college, no degree	10,117	2,755	2,364	4,934	2,338
Associate's degree	1,185	1,346	955	2,035	415
Bachelor's degree	1,734	3,022	1,958	4,493	1,548
Graduate or professional degree	72	791	1,203	2,647	935

Table 46 - Educational Attainment by Age

Data Source: 2006-2010 ACS

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	18,997
High school graduate (includes equivalency)	23,636
Some college or Associate's degree	30,408
Bachelor's degree	40,432
Graduate or professional degree	54,952

Table 47 – Median Earnings in the Past 12 Months

Data Source: 2006-2010 ACS

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

The major industries in Duluth are Arts, Entertainment, Accommodations, Education and Health Care Services, Retail Trade. They provide for 63% of all workers employment. This data is several years old, but these industries continue to have a large impact. Airplane manufacturing and repair has been booming in the last 3 years which is not reflected in data from 2010. In 2014, the construction industry was hiring. There are several large scale commercial construction projects that have put pressure on the demand for skilled laborers.

Describe the workforce and infrastructure needs of the business community:

Education and certifications are the key to employment in emerging fields. Apprenticeships related to construction trades and airplane manufacturing and repair are necessary to support the growing industries. The City will also continue to work with the School District, Universities, and Hospitals to advise and support development efforts. The City has completed a Higher Education Small Area Plan and is currently helping to create a hospital district plan.

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

As mentioned, skilled construction contractors are needed. With large scale commercial projects and a housing deficit the need for skilled labor is high. Construction wages are very high in Duluth partly due to the lack of skilled labor. The City of Duluth is working with it's workforce development center to create and connect low income residents with apprenticeships. It is also using its knowledge to guide the Duluth at Work collaborative program (a CDBG recipient) to move to emerging industries.

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

Duluth is growing in the 20 to 35 age group. Most of this growth is due to employment in engineering firms. The education obtainment is not lacking in Duluth. There is, however, a mismatch among those with high school and some college education. These groups tend be less connected to the growing fields. This is something that the City and workforce development center have been working to influence.

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

A new facility operated by Lake Superior College has opened up in the downtown to support training for trades industries. It is much more accessible to low income residents in its new location. It is a much larger facility than the previous facility which will allow for the program to expand its enrollment. We will work with our Duluth at Work collaborative to do a better job matching participants with emerging fields. The Duluth at Work system has benchmarks that require achieving items such as gaining employment and keeping employment for 2 years. Another benchmark is increasing the participants' income by 25% at the end of 2 years.

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

No

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

Discussion

The City of Duluth, Local Initiative Support Corporation, Work Force Development Center, SOAR Career Solutions, Churches United in Ministries, Life House, Neighborhood Youth Services, and Community Action Duluth participate in Duluth at Work. The Duluth at Work program provides assistance to for profit businesses by training participants for employment. The Duluth at Work program has a goal for each participant to gain employment, remain employed for 2 years, and receive a 25% increase in income in hopes to reduce dependence on public benefits programs. To do this agencies are reimbursed based on benchmark completion. Most participants in the Duluth at Work program have multiple barriers to employment. Agencies not only provide training but continue working with employers and participants to ensure success in the job placement. Agencies have worked closely with employers in growth industries such as health care. The past 2 years there has been a high demand for skilled construction workers. The Duluth at Work agencies have worked diligently to connect with employers and develop training programs that leave participants with appropriate skills and certifications such as commercial welding. The strong work history and continued support from the Duluth at Work agencies allows participants to grow in their career.

MA-50 Needs and Market Analysis Discussion

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

The City of Duluth does not have a problem with mutliple housing problems being concentrated in an area. There are areas where housing cost burden is a problem but the other housing problems such as substandard housing and overcrowding are not significant for LMI households. Of extremely low income residents in Census tract 3, 19% experiance overcrowding and 71% are experiencing a severe cost burden.

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

Yes. In the Hillside and Lincoln Park Neighborhoods there is a concentration of racial minorities. The City as a whole has about 10% minority population. According the 2007 - 2012 ACS, over 52% of the City's minority population lives in the Central Hillside and Lincoln Park neighborhoods. However, only 21% of the City's total population lives in these census tracts. Furthermore, the concentration of minority population is increasing. In 2010 ACS only 44% of the City's minority population lived in the same area while there was still 21% of the City's population living in these neighborhoods.

Another issue of concern is the concentration of poverty in these neighborhoods. These census tracts make a large portion of CDBG eligible block groups. The block groups are clustered together in these areas. These are both issues the Community Development staff and Community Development Committee are aware of when awarding subgrantee contracts.

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

According to the 2010 Census:

Lincoln Park: 6,504 residents; 52% make less than $25,000; 26% of the population make 25 to $50,000, while the remaining make over $50,000. In 2010, the unemployment rate was 11% (while it was 5% for the City), it is expected that this rate has decreased, along with the rest of the City.

Hillside: 6,665 residents; 55% make less than $25,000;31% make 25 to $50,000, while the remaining make less than $75,000. In 2010, the unemployment rate was 11%, it assumed that it is higher now.

Are there any community assets in these areas/neighborhoods?

Lincoln Park-close to the interstate, new businesses are opening, Wade Stadium, new middle school, located on the St. Louis River Corridor. In addition there is Community Action Financial Opportunity Center.

Hillside-located in the core of the Duluth, includes downtown (with theaters, hospitals, and the skywalk system) and has multiple parks.Has many active community groups and new developments being built. In addition there is the Housing Resource Connection, the Damino Center, and the proposed location of the Housing Access Center.

Are there other strategic opportunities in any of these areas?

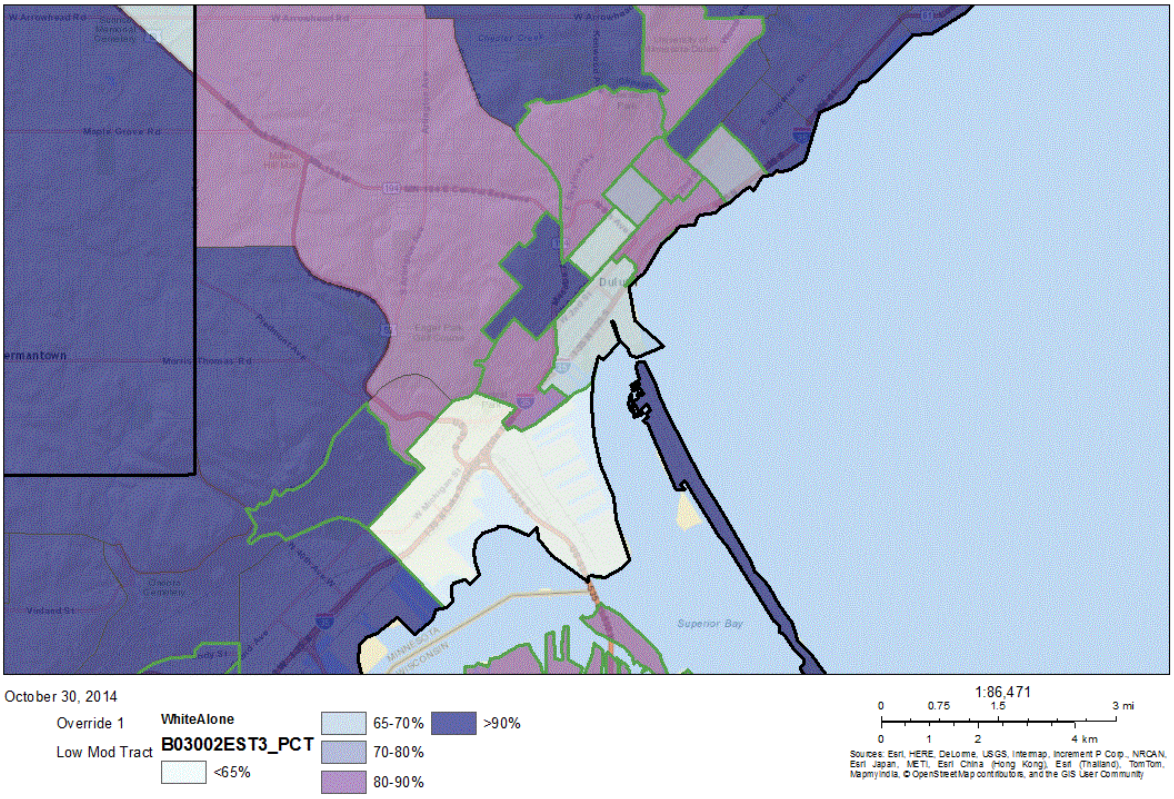
Lincoln Park- in 2014 the City of Duluth will be updating the Small Area Land Use Plan and the City will be developing an economic/tourist oriented plan for the St. Louis River Corridor.

Hillside- residential developments (Build-Up Duluth); commerical structures (including a 14 story office building and a transit center)

Existing plans: *www.**duluth**mn.gov/media/121776/**HillsideRevitalizationPlan**.pdf*

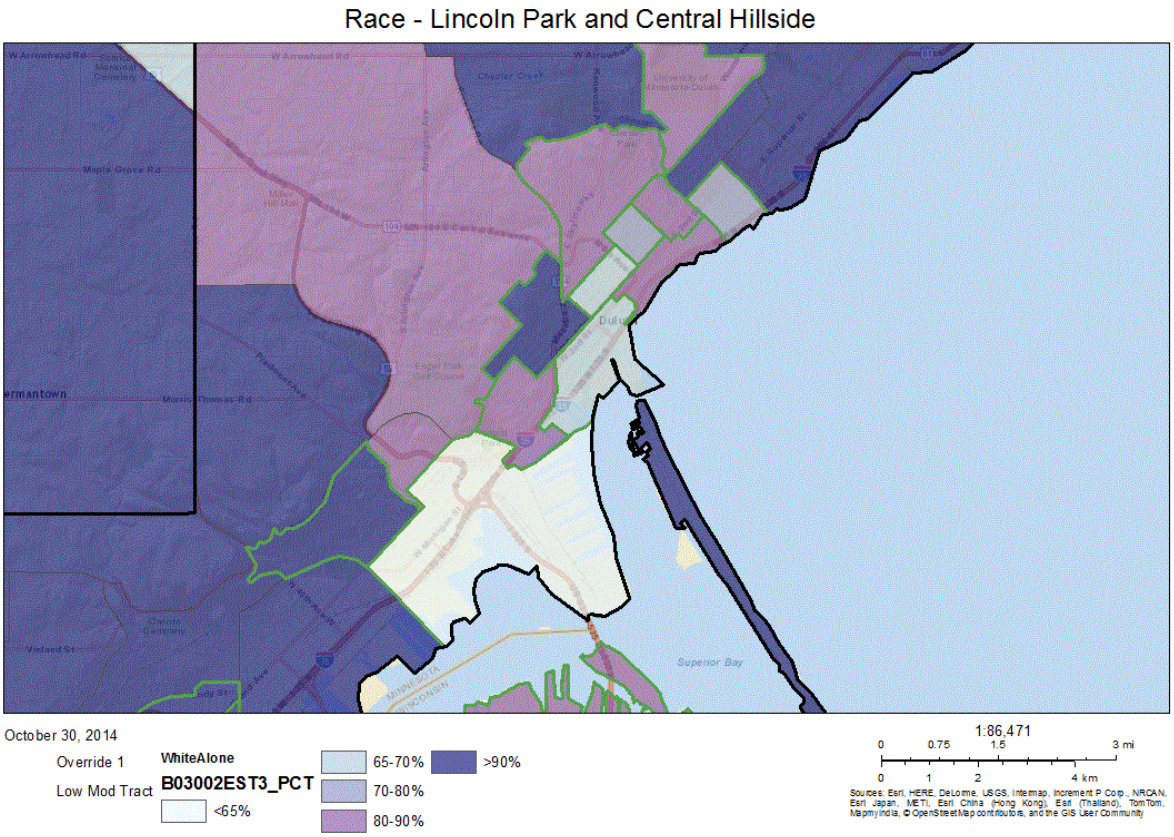
*www.duluthmn.gov/media/.../**LincolnParkRevitalizationPlan**.pdf*

Race - Lincoln Park and Central Hillside



Household Median Income - Lincoln Park and Central Hillside

OMB Control No: 2506-0117 (exp. 07/31/2015)



Race - Lincoln Park and Central Hillside

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan was developed using data collected for the Needs Analysis and Market Analysis. Along with public input the priorities were created to address issues pertaining to Housing, Homelessness, Public Facilities, and Economic Development.

OMB Control No: 2506-0117 (exp. 07/31/2015)

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

Geographic Area

Table 48 - Geographic Priority Areas

General Allocation Priorities

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

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

Priority Needs

Table 49 – Priority Needs Summary

1	**Priority Need Name**	Affordable Rental Housing
	Priority Level	High
	Population	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	
	Associated Goals	Affordable Rental Housing
	Description	Maintaining and increasing the supply of affordable rental units.
	Basis for Relative Priority	Renters as a whole are significantly cost burdened, with more than half of all Duluth tenants paying more than 30% of their income for housing. Very low and low-income families (both small and large households) are the most likely to experience severe cost burdens, spending half or more of their income on rent. There is an insufficient amount of subsided rental units to meet the demand, as indicated by the HRA's waiting lists for public housing and housing vouchers. The overall vacancy rate for rental units in Duluth is 3.7% in particular, households experiencing homelessness and those that do not qualify for HRA's housing programs have great difficulty securing and maintaining rental units.

OMB Control No: 2506-0117 (exp. 07/31/2015)

2	**Priority Need Name**	Affordable Owner Occupied Housing
	Priority Level	High
	Population	Low Moderate Large Families Families with Children Elderly
	Geographic Areas Affected	
	Associated Goals	Affordable Home Owner Housing
	Description	Assist familes to become homeowners by addressing value and/or affordabllity gap(s), and by increasing the supply of quality affordable single family units.
	Basis for Relative Priority	Although homeowners in general are less cost burden than renters, a higher percentage of low to moderate income owners are paying an excessive amout of their income towards housing, as well as experiencing housing problems. Housing problems include plumbing in disrepair, unvented or unreliable heating source, lack of basic kitchen facilities, leaks, pest infestations, missing or unsafe electrical systems or other health and safety violations. This creates a high number of homeowners who may be "precariously housed," barely able to keep up with the costs of owning a home. They often lack the resources to maintain their homes in good condition, or to upgrade an older house to modern energy standards. They also face a higher risk than renters of losing their housing through foreclosure. Most elderly homeowners are not paying excessive amounts of their income for housing.
3	**Priority Need Name**	Special Needs Housing
	Priority Level	High
	Population	Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions Persons with HIV/AIDS and their Families Victims of Domestic Violence

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Geographic Areas Affected	
	Associated Goals	Homelessness
	Description	Housing that accommodates people with disabilities and those who are homeless.
	Basis for Relative Priority	The 2008 ACS estimates that there are 6,416 persons between the ages of 18 and 64 with disabilities in Duluth. Often with individualized services and adaptive housing, persons with disabilities can live independently as contributing members of the community. In particular, persons with phyiscal disabilities greatly benefit from accessible housing, and those with chronic addition and/or mental health issues need support to maintain permanent housing and break a cycle of homelessness. Persons with special needs face additional obstacles in securing and retaining appropriate housing, and are therefore, a priority for housing resources. Based on the most recent "point in time" count, an estimated 300 to 350 person are experiencing homelessness in Duluth. Studies have shown that many of these individuals and families could maintain housing is they are provided an appropraite level of supportive services in subsidized housing units. As the "housing first" model becomes the focus of the Continuum of Care efforts to address long-term homelessness, there is an increased need for permanent, supportive housing units.
4	**Priority Need Name**	Communty Structural Public Facilities
	Priority Level	High

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Population	Extremely Low Low Moderate Middle Large Families Families with Children Elderly Public Housing Residents Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth Elderly Frail Elderly Persons with Mental Disabilities Persons with Physical Disabilities Persons with Developmental Disabilities Persons with Alcohol or Other Addictions
	Geographic Areas Affected	
	Associated Goals	Community Public Facilities
	Description	Assist neighborhood facilities that provide vital services with accessibility improvements and/or repairs due to flood damage and/or provide nutrition and food accessibility. These facilities include Homeless Facilities, Neighborhood Facilities, and Parking Facilities.

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Basis for Relative Priority	A majority of the structures in the City of Duluth were built prior to 1940, this includes Public Facilities. Since these buildings were built prior to regulations requiring universal accessibility, many of them are not accessible. In addition, in 2012, the City experienced a major flood that cause significant damage. This flood was declared a Presidential Emergency and due to it being so severe and costly, many buildings that service the public have not been able to be adequately repaired.
5	**Priority Need Name**	Community Non-Structural Public Facilities
	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Elderly
	Geographic Areas Affected	
	Associated Goals	Community Development Infrastructure Neighborhood Revitalization
	Description	Assisting LMI homeowners with street improvement assessments. Assisting LMI neighborhoods by installing sidewalk accessibility. Improving mostly LMI neighborhoods with blight removal (acquiring real property and demolition).
	Basis for Relative Priority	The majority of the roads in neighborhoods were constructured when the housing was built, which is pre-1940; therefore the roads are old. This, combined with the harsh winters and the freeze/thaw effect of Duluth winters makes the roads requiring on-going maintenance, which was not always possible, therefore there are many roads in very poor condition. In addition most utilities that are located under those streets are 85 years old. During the 2014 Community Survey, road repair was the highest requested item. In addition, there are number of structures (mostly residential) that were built prior to 1940 that have not been maintained and have been determined by housing rehab specialists to be more expensive to repair than to demolish. The majority of these blighted structures are in LMI neighborhoods, which in impacts the living conditions and home values. By removing these structures, these neighborhoods could improve in value and safety.
6	**Priority Need Name**	Public Services
	Priority Level	High

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Population	Extremely Low Low
	Geographic Areas Affected	
	Associated Goals	Public Services
	Description	Funds will be use for programs which meets the basic needs of the community.
	Basis for Relative Priority	The programs to be supported fulfill basic needs (food and shelter) for people who are low-income and/or homeless; provide health and dental care for residents who are uninsured by the American Affordable Health Care Act; help abused and neglected youth and others who are homeless or at risk of becoming homeless, and provide tenant/landlord mediation services to prevent evictions.
7	**Priority Need Name**	Economic Development
	Priority Level	High
	Population	Extremely Low Low Moderate
	Geographic Areas Affected	
	Associated Goals	Economic Development
	Description	Support Duluth at Work initiatives that assist participants to access living wage jobs through local businesses and support programs that help low-income people gain work skills; jobs and employment history that results in increased income and overall stability. Provide training and technical assistance to businesses to increase assets and create jobs.
	Basis for Relative Priority	Computer skills, technical training and resume writing where the top three employment training needs identified in the 2014 Community Survey. The primary obstacles to employement reported by the Community Survey respondents were disability or health issues and lack of training and education.
8	**Priority Need Name**	Homelessness

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Priority Level	High
	Population	Extremely Low Low Large Families Families with Children Chronic Homelessness Individuals Families with Children Mentally Ill Chronic Substance Abuse veterans Persons with HIV/AIDS Victims of Domestic Violence Unaccompanied Youth
	Geographic Areas Affected	
	Associated Goals	Tenant Based Rental Assistance Homelessness
	Description	• Support the implementation and operation of coordinated access entry sites for families; youth and singles; • Support housing stabilization initiatves for homeless populations with special needs, • Support the operation of emergency shelter facilities that help homeless families, youth and individuals rapidly access housing and become stably housed • Provide shelter and stabilzation services for women and children experiencing domestic violence and/or sex trafficing • Create additional permanent supportive housing units for chronically homeless or persons with special needs • Support creation or renovation of shelter facility for homeless youth

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Basis for Relative Priority	The 2008 ACS estimates that there are 6,416 persons between the ages of 18 and 64 with disabilities in Duluth. Often with individualized services and adaptive housing, persons with disabilities can live independently as contributing members of the community. In particular, persons with phyiscal disabilities greatly benefit from accessible housing, and those with chronic addiction and/or mental health issues need support to maintain permanent housing and break a cycle of homelessness. Persons with special needs face additional obstacles in securing and retaining appropriate housing, and are therefore, a priority for housing resources. Based on the most recent "point in time" count, an estimated 300 to 350 person are experiencing homelessness in Duluth. Studies have shown that many of these individuals and families could maintain housing is they are provided an appropraite level of supportive services in subsidized housing units. As the "housing first" model becomes the focus of the Continuum of Care efforts to address long-term homelessness. There is an increased need for permanent, supportive housing units. There is also a need to reduce the number of days people experience in a shelter.

Narrative (Optional)

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

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	The HRA provides rental assistance to approximately 22 households who would otherwise be homeless. These people are assisted until they can transition onto Section 8 Housing Choice Voucher. This program is part of the continuum of services to prevent homelessness by bridging the gap. These vouchers secure safe, decent and affordable housing for individuals who normally would not have the financial means do so it themselves. Market conditions that lead to the use of HOME funds for tenant-based rental assistance are rents that are unaffordable for extremely-low income households, and a vacancy rate of 3.4% in rental properties.
TBRA for Non-Homeless Special Needs	Not applicable.
New Unit Production	Most of Duluth's housing stock requires significant upgrades. As Duluth grows economically, attracting jobs in airplane manufacturing and engineering, population is projected to grow. A study conducted by Maxfield Research Inc. found that the current housing stock cannot accommodate the growth in population. Issues that were highlighted by the study were the lack of larger and upscale rental units, the underutilization of financing tools to expand housing supply, and the age and maintenance requirements of the existing housing stock. An example of the limitations of an old housing stock was explained to the Community Development staff at an open house in the Lincoln Park Neighborhood. A young couple explained their experience looking to purchase a house in the neighborhood. Most of the houses were built before the 1950's and required many substantial upgrades. Upgrades include weatherization, lead paint mitigation, installation of modern appliances, and general maintenance requirements. While most of the homes were affordable even with the upgrades, they could not secure a loan from the bank. The value of the upgrades would not have been reflected in the houses market value thus creating a value gap at which a commercial bank would not support. With the need for 4,400 new housing units by 2019 the City of Duluth believes that an all of the above approach to new housing is necessary. There needs to be an increase in supply of all types of housing units including rental, owner occupied, affordable, and market rate.

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Rehabilitation	The City of Duluth has an aging housing stock. 54% and of owner occupied and 48% of rental units were built before 1950. Furthermore, units built before 1980 make up 85% of owner occupied and 80% of rental units. This means over 80% of housing units in Duluth are at least 35 years old. Most housing units in Duluth require or will require significant upgrades in the near future. With tight rental and homeowner markets there has been little incentive for property owners to upgrade their units. Code enforcement by the City of Duluth's Life Safety Division has been lacking. This was an impediment identified in the City's Analysis of Impediments to Fair Housing Choice.
Acquisition, including preservation	

Table 50 – Influence of Market Conditions

	Has one or more of four housing problems					Has none or more of four housing problems				
Disability Status	0-30% AMI	30-50% AMI	50-80% AMI	>80% AMI	Total	0-30% AMI	30-50% AMI	50-80% AMI	>80% AMI	Total
Households member has a cognitive limitation	780	235	325	75	1415	250	230	235	885	1600
Household member has a hearing or vision impairment	375	350	265	220	1210	75	305	375	1140	1895
Household member has a self-fare or independent living limitation	525	425	240	155	1345	215	280	270	850	1615
Household member has an ambulatory limitation	750	520	320	250	1840	255	465	370	1160	2250
Household member has none of the above limitations	3325	2300	2775	1535	9935	635	795	3135	14210	18775
Source: 2008 to 2010 CHAS										

Disbaled Population Summary from 2008 to 2010 CHAS

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

Introduction

The City of Duluth expects to receive nearly $3,000,000 in funds from the Department of Housing and Urban Development (including CDBG, HOME, and ESG). The City has prioritized projects and activities in this plan and will work to dispurse the funds to meet the goals and objectives identified.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,224,734	0	0	2,224,734	8,898,636	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	544,482	0	0	544,482	2,177,928	

OMB Control No: 2506-0117 (exp. 07/31/2015)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	183,852	0	0	183,852	735,408	

Table 51 - Anticipated Resources

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

CDBG, HOME, and ESG funds will help to leverage over $20,000,000 annually ($100,000,000 over the 5-year plan) of other federal, state, and local funds. Matching requirements have been regularly met and the City doesn't anticipate having difficulty in satisfying these requirements.

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

Although not already identified, publically owned land is always considered as a way to reduce costs for new housing develoments. The City of Duluth regularily considers using tax forfeited properites that Saint Louis County manages. These lands range from homes that are in need of rehab, to severly damaged/condemned buildings, to open lots. Often the City attempts to work with the county to remove the blighted structures and redevelop the land.

OMB Control No: 2506-0117 (exp. 07/31/2015)

Discussion

The City continues to work with area funders, federal, state, and local funders to be able to leverage the federal funds that are received. While local private Foundations experienced a period of reduced funding availability, projections show those amounts to increase. Individual organizations and collaborations have improved at seeking out new and alternative funding sources, in order to maintain service levels within the City. The City also continues to encourage cost-saving-collaborations within the housing, public service, and economic development areas.

OMB Control No: 2506-0117 (exp. 07/31/2015)

SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
DULUTH	Government	Planning neighborhood improvements public facilities	Other
HOUSING AND REDEVELOPMENT AUTHORITY OF DULUTH	PHA	Homelessness Ownership Public Housing Rental	Other

Table 52 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

To implement the Consolidated Plan the Community Development Division has a strong partnership with nonprofit and private housing providers, the Housing and Redevelopment Authority of Duluth, social service providers and other public institutions. The Local Initiatives Support Corporation (LISC) is one partner that works closely with the City of Duluth on affordable housing issues. LISC assists Community Development Corporations (CDCs) to implement community goals and provides technical assistance to build capacity in the CDCs to implement their strategic initiatives. Also, LISC assists with bridge financing to promote development that revitalizes neighborhoods through housing and business redevelopment.

The At Home In Duluth collaborative is another partnership consisting of public and private partners and nonprofit housing agencies focused on the revitalization of Duluth's core neighborhoods. This group (facilitated by LISC) has worked with neighborhood residents to develop revitalization plans that include housing goals. A focus of the At Home partnership is to build relationships with private developers to encourage new housing units within the Target Areas, along with reaching out to other partners to implement other strategies of their plans.

Duluth at Work collaborative is a partnership between Community Development, LISC and the Workforce Development Division to work with local businesses and place trained individuals from the Temporary Assistance for Needy Families (TANF) program in jobs. A key component of Duluth at Work is the goal of increasing income and assets of low-moderate income individuals by 25% over a three-year period.

The City of Duluth, in collaboration with St. Louis County, has adopted a ten-year plan to address homelessness. The ten-year plan contains new strategies for ending homelessness, particularly for people who are chronically homeless. The City is a partner in the implementation process for the plan and has three members on the implementation committee. This committee includes members from the public, nonprofit and private sectors. Further definition is needed for better coordination with

OMB Control No: 2506-0117 (exp. 07/31/2015)

resources to meet the needs of persons who are homeless or at risk of becoming homeless to address shortages in the operation of units within the Continuum of Care inventory.

The Housing and Redevelopment Authority of Duluth (HRA) is a partner with the Community Development Division. The HRA board is appointed by the Mayor and confirmed by the City Council. A number of services are provided by the HRA that assist with the Community Development program administration through construction management, relocation and on-site code compliance inspection services.

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

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	X	X	
Legal Assistance	X	X	
Mortgage Assistance	X		
Rental Assistance	X	X	
Utilities Assistance	X	X	
Street Outreach Services			
Law Enforcement	X	X	
Mobile Clinics			
Other Street Outreach Services	X	X	
Supportive Services			
Alcohol & Drug Abuse	X	X	
Child Care	X	X	
Education	X		
Employment and Employment Training	X	X	
Healthcare	X	X	
HIV/AIDS			
Life Skills	X	X	
Mental Health Counseling	X	X	
Transportation	X		
Other			
Food Services	X	X	

Table 53 - Homeless Prevention Services Summary

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

OMB Control No: 2506-0117 (exp. 07/31/2015)

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

The City of Duluth supports a wide array of mainstream services. The City of Duluth supports the Duluth at Work program through its CDBG funding. This is an employment program to help those facing barriers to employment. The Duluth at Work program mostly targets extremely low income individuals who are often not deemed to be work ready by the workforce center. The Duluth at Work program brings together several organizations who share best practices in job training, employer relationship building, and screening. The participants in the Duluth at Work program often cannot find assistance through the more traditional workforce center. These two programs work together to help low income individuals gain job readiness skills and job training. They help connect participants to employers. The Duluth at Work program uses benchmarks to reward agencies whose participants remain employed for 2 years, gain a 25% increase in wages, and are employed full time. These 3 goals help the participant gain the necessary experience to obtain a higher paying job in the future.

The City of Duluth also supports several food access programs through its CDBG program. The Duluth Hunger project is a group consisting of the Salvation Army, Damiano Center, and Churches United in Ministry. These three organizations work to provide meals and operate food shelves. They coordinate with Second Harvest food pantry. Meals are served in a manner to prevent overlap and in geographically dispersed areas in order to provide greater ost access. There is also a medical food shelf for those individuals with dietary restrictions.

Access to health care is something that is evolving in Duluth. The CDBG program has funded for many years the Lake Superior Community Health Center. This facility has both doctors and dentists. The affordable health care act has helped many low income residents obtain access to health care. Lake Superior Community Health Center and several other partners set up navigators to help low income individuals and households gain access to no cost/ low cost health insurance. Other health agencies that help connect individuals to health care include St. Louis County's Health and Human Services department, Lutheran Social Services, and Community Action Duluth. Furthermore, mental health services are provided by the Human Development Center and Saint Louis County Health and Human Services. Case Management and help with benefits applications, crisis assistance, day treatment, employability, and medication monitor are a few of the services that are available.The Minnesota Assistance Council for Veterans provides services for veterans. It helps veterans to stabilized living through rent/mortgage assistance and temporary housing, sustainable, living wage employment through training and placement, referral and resolution to civil legal issues, life skills education, money management skills training and financial plan development.

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

One of the objectives in the SLC Continuum of Care Plan is to increase progress towards ending chronic homelessness. The Plan established a baseline in 2013 of 399 permanent supports beds not dedicated for use by the chronically homeless, but available for occupancy (all of SLC), and a total of 114 beds dedicated for the chronically homeless. With a focus on ending chronic homelessness over the next few years, homeless PSH providers agreed to prioritize 95% of the PSH beds not dedicated for use by chronically homeless, but available through annual turnover, for use by chronically homeless individuals and families. Strategies include:

- Coordinate Assessment process that streamlines access to mainstream services
- Collaboration with the Affordable Housing Coalition to address housing needs and creation of new resources and units.
- Increase capacity of COCs to coordinate mainstream services and address gaps in housing.
- Tracking of data and evaluation of service delivery to insure services are meeting efficiency benchmarks.

OMB Control No: 2506-0117 (exp. 07/31/2015)

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Rental Housing	2015	2019	Affordable Housing Public Housing Non-Homeless Special Needs		Affordable Rental Housing	CDBG: $1,668,550 HOME: $554,482	Rental units constructed: 300 Household Housing Unit Rental units rehabilitated: 250 Household Housing Unit
2	Tenant Based Rental Assistance	2015	2019	Homeless		Homelessness	HOME: $952,843	Tenant-based rental assistance / Rapid Rehousing: 350 Households Assisted
3	Affordable Home Owner Housing	2015	2019	Affordable Housing		Affordable Owner Occupied Housing		Rental units constructed: 50 Household Housing Unit Rental units rehabilitated: 725 Household Housing Unit
4	Community Public Facilities	2015	2019	Homeless Non-Homeless Special Needs Non-Housing Community Development		Communty Structural Public Facilities	CDBG: $1,668,551	Other: 7 Other

OMB Control No: 2506-0117 (exp. 07/31/2015)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Community Development Infrastructure	2015	2019	Non-Housing Community Development		Community Non-Structural Public Facilities	CDBG: $222,473	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 100 Households Assisted Other: 1 Other
6	Public Services	2015	2019	Homeless Non-Housing Community Development		Public Services	CDBG: $1,668,551	Public service activities for Low/Moderate Income Housing Benefit: 104670 Households Assisted
7	Economic Development	2015	2019	Non-Housing Community Development		Economic Development	CDBG: $1,668,551	Jobs created/retained: 163 Jobs Businesses assisted: 40 Businesses Assisted
8	Neighborhood Revitalization	2015	2019	Non-Housing Community Development		Community Non-Structural Public Facilities	CDBG: $333,710	Buildings Demolished: 10 Buildings
9	Homelessness	2015	2019	Homeless		Special Needs Housing Homelessness	ESG: $850,315	Homeless Person Overnight Shelter: 6000 Persons Assisted Homelessness Prevention: 300 Persons Assisted

Table 54 – Goals Summary

OMB Control No: 2506-0117 (exp. 07/31/2015)

Goal Descriptions

1	**Goal Name**	Affordable Rental Housing
	Goal Description	• Assist households to secure housing through affordable rental development. • Improve energy efficiency of rental units • Rehab multifamily units to meet Health Homes Standards
2	**Goal Name**	Tenant Based Rental Assistance
	Goal Description	Assist homeless families and singles identitied through a Coordinated Aceess Process
3	**Goal Name**	Affordable Home Owner Housing
	Goal Description	• Assist families to become homeowners by addressing value and/or affordablity gaps and by increasing the supply of quality affordable single housing • Improve energy efficiency of single family housing units • Rehab single family units to meet Health Home Standards
4	**Goal Name**	Community Public Facilities
	Goal Description	Assist neighborhood facilities that provide vital services with accessibilty improvements and/or repairs due to flood damage. These facilities include Homeless Facilities, Neighborhood Facilities, and Parking Facilities. NOTE: The Goal Indicator is for Facilities. The projects will be to service LMI households.
5	**Goal Name**	Community Development Infrastructure
	Goal Description	• Assist LMI homeowners with street assessments • Improve sidewalk accessibility

OMB Control No: 2506-0117 (exp. 07/31/2015)

6	**Goal Name**	Public Services
	Goal Description	• Support programs that fulfill basic needs (food and shelter) for people who are low-income and/or homeless • Support health and dental care services for Duluth residents who are uninsured • Support programs that help abused and neglected youth who are homeless or at risk of homelessness become stably housed. • Provide tenant/landlord mediation services to prevent evictions • Support Permanent Housing
7	**Goal Name**	Economic Development
	Goal Description	• Support Duluth at Work initiatives that assist participants to access living wage jobs through local businesses • Support Duluth at Work initiatives that help low-income people gain work skills, jobs and employment history that results in increased income and overall stability • Provide training and technical assistance to business to increase assets and create jobs
8	**Goal Name**	Neighborhood Revitalization
	Goal Description	• Address vacant, substandard properties that may or may not be suitable for rehab • Acquire blighted properties and lots for demolition and redevelopment activities

OMB Control No: 2506-0117 (exp. 07/31/2015)

9	**Goal Name**	Homelessness
	Goal Description	• Support the implementation and operation of coordinated access entry sites for families, youth and singles • Support housing stabilization initiatives for homeless populations with special needs • Support the operation of emergency shelter facilities that help homeless families, youth, and individuals rapidly access housing and become stably housed • Provide shelter and stabilization services for women and children experiencing domestic violence and/or sex trafficking • Create additional permanent supportive housing units chronically homeless or persons with special needs • Support creation or renovation of shelter facility for homeless youth

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

OMB Control No: 2506-0117 (exp. 07/31/2015)

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

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

The HRA completed a HUD required Section 504 needs assessment several years ago as required by 24 CFR 8.25 and is in compliance, having a sufficient number of handicapped accessible units within its public housing inventory to meet the needs of existing residents and eligible applicants on its waiting list.

Activities to Increase Resident Involvements

Continue communication through tenant meetings and newsletters.

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

No

Plan to remove the 'troubled' designation

NA

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

Barriers to Affordable Housing

- Lack of annual budgeted funding to demolish or repair buildings condemned for demolition or human habitation, allowing blight to persist in LMI neighborhoods.
- The City requires assessments placed on vacant lots where structures have been demolished be paid by any new owner, rendering otherwise buildable infill sites financially infeasible for redevelopment.
- "One-for-one" replacement requirements when structures are demolished on 25 front foot unbuildable lots.
- Sewer utility fees and other utility hook-up fees increase the cost of construction of affordable single-family homes.
- Limited Minnesota Housing funding for rehab of aging single-family structures occupied by LMI households, which leads to higher maintenance costs.
- Lack of a policy to require improvements to foreclosed properties in LMI neighborhoods that are on the vacant property register.
- Inflexible policies related to Comfort System's energy improvement programs that limit access to loans by LMI households, including refusal to subordinate when first mortgages are refinanced.
- Minnesota State Historic Preservation Office policies that create additional rehab costs, such as wooden windows and doors repaired rather that replaced by new historically designed materials.
- Outdated historic property references that trigger SHPO review of affordable housing rehab projects on buildings not eligible for listing, which increases costs and delays.
- Lack of direction from City Administration to enforce existing rental license program.
- No education requirement for owners and/or managers to secure a rental license.
- Lack of direction from City Administration to enforce housing maintenance code.
- Lack of energy standards for existing housing stock that result in higher costs for LMI households living in older homes that are energy inefficient.
- Housing & Redevelopment Authority policies that prevent LMI households with poor rental histories or criminal backgrounds from securing assisted housing.
- HUD HOME Program after-rehab value limit based on 95% of median sales price from the extensive Duluth/Superior metropolitan statistical area, and the value limit not adjusted for homes with three or more bedrooms occupied by larger families.
- HUD HOME Program ruling that disallows use of local exception rents in favor of fair market rents in HOME assisted affordable rental housing.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

- Support selected demolition of blighted properties in LMI neighborhoods. If funded by Community Development, requirement will be to leave a "clean" site for redevelopment.
- Community Development supported rehab projects will address all needed repairs and updates, including housing code, energy efficiency, and healthy home deficiencies.
- Implement acquisition/rehab/resale activities to address vacant foreclosed properties in LMI neighborhoods.
- Review annual Housing Report sales data to determine if a local study of median sales price would increase after-rehab value limit.
- Require rehab programs receiving Community Development funding to increase energy efficiency in existing homes by 20%, and require funded new construction to meet Energy Star standards.
- Provide funding for tenant-based rental assistance to help the "hard-to-house" and homeless population to secure adequate housing.
- Modify policies to eliminate the "re-instatement" of special assessments on tax forfeit lots that have the potential for redevelopment.
- Support additional historic surveys in the central and western areas of Duluth.
- Support the establishment of inclusionary affordable housing in zoning policies.
- Encourage Comfort Systems to revise their loan programs to be more "user friendly" and to coordinate with the Housing Resource Connection.
- Integrate rental license building inspectors into the "One Stop Shop".
- Work with St. Louis County and the Minnesota Department of Revenue to revise polices to encourage redevelopment of tax forfeit land.
- Strengthen rental license program to include such requirements as common applications and leases, affordable application and damage fees, and timely and consistent enforcement of building standards.
- Reduce property tax valuations to reflect affordable housing restrictions that would prohibit owners from selling at full market rate.

SP-60 Homelessness Strategy – 91.215(d)

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

The City of Duluth has a strong homeless response system and is working closely with St. Louis County and homelessness service provider agencies to strengthen system access and service delivery through implementation of the goals and outcomes outlined in the HEARTH Act and under the new Emergency Solutions Grant and Continuum of Care regulations. Components of the Homeless Response System in Duluth include:

Outreach

Described in section MA-19, outreach activities in Duluth are coordinated through a strong network of homeless shelter and service provider agencies (CHUM, Life House, LSS and HDC) in partnership with the Duluth Police and St. Louis County Health and Human Services. Street outreach activities are conducted daily and most evenings and extend beyond the city limits of Duluth. CHUM and MACV also conduct outreach in the hospitals and jails/prisons.

In addition to the day-to-day outreach, Duluth also conducts an annual Project Homeless Connect Event for homeless persons and MACV organizes an annual Stand Down event for homeless veterans. Continuum of Care homeless housing and service provider partner agencies also conduct an annual Homeless Summit annually.

Addressing the emergency and transitional housing needs of homeless persons

Emergency Shelter

The shelter system in Duluth is comprised of three emergency shelters. The CHUM Shelter serves singles through their congregate facility and families at their off-site facilities. Many of the persons that access services at CHUM are identified as 'high barriered' and the 'hardest to house'. In addition to the 44 congregate beds, CHUM provide overflow mats if the beds are full. In some circumstances, CHUM works with their Churches United in Ministry partners to provide families with shelter at a nearby church when their family units are full. In 2015, CHUM will expand their number of family units to 6, which will be part of the O'Neil Apartment Permanent Supportive Housing Project.

Safe Haven Shelter and the American Indian Community Housing Organization both provide shelter and services to single women and women with children who are fleeing domestic violence. Safety is their first priority for the women (and children) who enter their shelters. Participants have access to a wide range of supportive services, including food, clothing, transportation and legal assistance, access to mental health assistance, case management and children's advocacy. In addition, AICHO provides culturally specific programming for Native American women (and their children).

OMB Control No: 2506-0117 (exp. 07/31/2015)

Union Gospel Mission

Union Gospel Mission is primarily a soup kitchen where people can access hot meals each day. The 11 SRO units above the soup kitchen facility are targeted for chronic homeless single men.

Transitional Housing

Five agencies in Duluth provide transitional housing and supportive services to homeless persons. They are the American Indian Community Housing Organization who provides transitional housing and culturally focused support services for primarily (but not limited to) Native American Women and Women-headed families, Center City Housing who provides transitional housing and supportive services to single women and families, the Salvation Army who provides transitional housing and supportive services to one and two-parent families and Life House and Lutheran Social Services, both provide transitional housing and supportive services to homeless youth (ages 16-23). Minnesota Assistance Council for Veterans provides transitional housing and services to homeless veterans. Approximately, 1,800 homeless persons are assisted through the Duluth shelter system annually.

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

Duluth has slowly been building its supply of Permanent Supportive Housing (PSH) to serve persons with disabilities and the chronically homeless. Center City Housing Organization operates the San Marco and Memorial Park apartment facilities that house single men and women, Alicia's Place for single women, and Sheila's Place that serves families. The American Indian Community Housing Organization operates the Gimaajii apartments for families, primarily for (but not limited to) Native Americans. Minnesota Assistance Council for Veterans operates the Duluth Vets Place for single veterans.

The Housing Authority of Duluth provides Shelter + Care vouchers. Almost half – 42% (46/108) of the PSH units in Duluth are targeted for chronically homeless persons (does not include units under development).

Rapid Re-housing

CHUM Shelter, Safe Haven Shelter, AICHO, Salvation Army and Life House all participate in Rapid Re-housing programming. Funding for rapid re-housing activities is provided through the Emergency

Solutions Grant (ESG) Program, the Continuum of Care Program and through the state's Family Homeless Prevention and Assistance Program (FHPAP). Prioritization protocols were established for targeting families and households that are the most appropriate for this type of assistance. These are the agencies that will be the entry points for Coordinated Access and Assessment in Duluth and once that system is fully functioning, rapid re-housing activities will be coordinated through the CAA system. Rapid Re-housing assistance includes short and medium-term rental assistance, rental arrears, deposit, utility payments and utility arrears, and application fees, moving assistance, case management and connection to mainstream resources.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

Salvation Army, Life House, AICHO and Legal Aid Services of Northeast Minnesota provide prevention assistance in the City of Duluth. Funding for prevention assistance is provided through the ESG and FHPAP programs. Legal Aid activities are limited to mediation and legal issues, whereas the others also provide rental assistance, rental arrears, utility payments and utility arrears, moving assistance, case management and connection to mainstream resources. Once the Coordinated Access and Assessment system is fully functioning in Duluth, prevention activities will be coordinated that system.

In 2008, a Discharge Plan that was approved and adopted, outlines the protocols and transition process steps for discharging from institutions. A standardized assessment tool was developed and is being used by discharging entities in Duluth and throughout St. Louis County upon client admission to identify those at risk of homelessness, specific services to be offered to all clients and additional services offered to at-risk clients. Participating stakeholders in the City of Duluth include Essentia Health System, St. Luke's Holspital, the Center for Drug and Alcohol Treatment St. Louis County Corrections, St. Louis Health and Human Service and the primary shelter in Duluth, CHUM Shelter. Chum staff are the main contacts in Duluth; they keep in contact with the other entities and are notified when someone is going to be discharged who is choosing to be discharged to CHUM. CHUM staff will work with the individual to locate housing prior to discharge. SOAR Career Solutions, through their Community Offender Re-Entry Program, offers specialized assistance to men exiting prison who were incarcerated for sex crimes. Program staff assist ex-offenders in their transition from incarceration to the community through support, employment services, mentoring, housing search and assistance and extended case management.

Continuum of Care Objectives

The St. Louis County SLC Continuum of Care Plan has five primary objectives; they are:

1. Increase progress towards ending chronic homelessness

- Allocating funds for additional chronic beds

- Set a goal to prioritize 95% of the PSH beds not dedicatedfor use by chronically homeless, but available through annualturnover, for use by the chronically homeless.

2. Increase housing stability

- Implementation of the Coordinated Access and Assessment
- Best practices for case management and assessment
- Agencies adopt and implement Housing First model
- Transitional Housing transition plan (except youth, DV and CD).

3. Increased income for program participants

- Adopt best practices for increasing non-employment income
- Make sure eligible participants are connected to Supplimental Security Income/ Social Security Disability Benifits

4. Increase the number of people accessing mainstream benefits

- Agencies will participate in training sessions on Mainstream Benefits
- Enrollment and outreach activities are being implemented to connect eligible households to appropriate Affordable Care Act options.

5. Expand Rapid Re-housing assistance as a method to reduce family homelessness

- Allocate additional resources for Rapid Re-housing
- Maximize existing Rapid Rehousing resources using 'least touch' model
- Align CoC rapid re-housing assistance with Emergency Solutions Grant, Supportive Services for Veteran Families, and Familiy Homeless Prevention Assistance Program
- Rapid Re-housing programs and develop best practice protocols to be implemented through the Coordinated Access System.

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

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

The City, in partnership with the Duluth HRA, applied for and secured $1,144,684 in 2010 HUD Lead-Based Paint Hazard Control Grant Program funds. The term of this initial grant will end in February, 2014. The goal of 70 units has been reached, but funds remaining in the grant necessitated an extension of the term by one year. A new Lead-Based Paint application was submitted to HUD in January, 2013, and was awarded $2,418,395, that will allow the continuation of this work until 2016.

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

The risks related to lead poisoning and hazards are being reduced.

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

City of Duluth policy requires all rental and homeowner rehabilitation programs and projects receiving federally funded assistance to coordinate with the Duluth HRA for lead assessment, testing and clearance services. Given the age of Duluth's housing stock that predicts 68% contains lead-based paint, the concentration of low- and moderate-income households in less expensive older units, and the past experience of agencies implementing rehab programs, it is highly probable that all, or nearly all, rehabbed units will contain potential lead hazards. The Duluth HRA maintains a Lead Safe Housing registry of past units that have been made lead safe. To increase access to this registry by the general public, the HRA has made their database available on the HRA website.

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

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

The overarching goal of this anti-poverty strategy is to reduce the number of Duluth's families and individuals currently living in poverty. Any goal of reducing poverty must look beyond the effects (not being able to afford housing, clothing, child care, adequate nutrition, among other things) to the causes, the root of poverty, and provide resources to empower people to achieve self-sufficiency.

The Community Development Division has worked with the City's primary TANF agency, the Workforce Development Division, which includes the "One-stop" Workforce Center, to develop a strategy that focuses on coordinating both an affordable housing and employment training approach which reduces barriers to achieving economic self-sufficiency. The following policies form the basis of the funding evaluation process that will be utilized by the City for determining how the annual investment of Community Development resources will assist to implement that strategy:

Policy #1: Provide occupational training programs coupled with career development and job placement in partnership with the City's Workforce Development Division and the Financial Opportunity Center at Community Action Duluth to enable people to obtain employment.

Policy #2: Assist families with removing barriers to obtaining employment through long term or sustainable solutions that reduce the cost of essentials or burdens to household incomes.

Policy #3: Focus on efforts to reduce the costs on household's budgets through energy efficiency programs that lower utilities and/or programs that assist with building assets of families through planned savings programs or assistance with homeownership opportunities.

Policy #4: Increase the amount of affordable housing units within the City that have long-term affordability restrictions (greater than 30 years), to maintain housing for low-to-moderate-income residents within our community.

An individual household's situation and why they are in poverty is complicated. It is much more than a simple calculation of annual household income. The City and other agencies have developed sources of information that examine the details of other life issues that, combined with personal interviews, have helped us to better understand many of the root causes of poverty.

There is very well documented evidence of what accounts for family distress as a result of insufficient income to afford basic human needs. Some of the most commonly described root causes of poverty that the City will address are:

- Little or no education
- Insufficient employment skills, including employment soft skills
- Housing priced beyond a family's means

OMB Control No: 2506-0117 (exp. 07/31/2015)

- Lack of adequate health care
- Mental health issues that impact employment opportunity
- Assist tenants with access to rental housing and tenant/landlord mediation

These and other life situations can and do combine to severely limit a family's ability to secure and maintain permanent employment that yields a living wage. Some of these factors can be out of the local agency's control, but many of the programs funded through Duluth At Work are focused on working with families to address these factors and eliminate barriers.

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

Increasing the amount of affordable housing units within the City that have long-term affordability restrictions (greater than 30 years), to maintain housing for low-to-moderate-income residents within our community directly relates to the affordable housing plan.

SP-80 Monitoring – 91.230

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

The Community Development Division and City Auditor's Office conducts an annual risk assessment. This risk assessment of the subrecipients is based upon material weaknesses cited in the audit and performance in submitting appropriate documentation of expenditures, demographic information and other contract requirements and is completed on an annual basis. A high-risk subrecipient has material weaknesses and/or significant deficiencies in their audit relating to the above-mentioned federal programs, lacks sufficient accounting policies and procedures to safeguard federal assets, and/or submits inaccurate payment request documentation and/or late demographic reports. On-site monitoring shall consist of financial monitoring and programmatic compliance. Further inormation can be found in the Community Development Monitoring manual.

The Community Development Committee shall hold a CAPER (Consolidated Annual Performance Evaluation Report) Public Hearing for the purpose of reviewing activity accomplishments for the previous year within 90 days after the completion of the City's Community Development Program year. The records presented at this hearing are available during normal business hours for public inspection in the Community Development Office. A copy of the City of Duluth's Monitoring Process is on the City's website.

Expected Resources

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

Introduction

The City of Duluth expects to receive nearly $3,000,000 in funds from the Department of Housing and Urban Development (including CDBG, HOME, and ESG). The city has prioritized projects and activities in this plan and will work to dispurse the funds to meet the goals and objectives identified.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	2,224,734	0	0	2,224,734	8,898,636	
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	544,482	0	0	544,482	2,177,928	

OMB Control No: 2506-0117 (exp. 07/31/2015)

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan $	Narrative Description
			Annual Allocation: $	Program Income: $	Prior Year Resources: $	Total: $		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	183,852	0	0	183,852	735,408	

Table 55 - Expected Resources – Priority Table

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

CDBG, HOME, and ESG funds will help to leverage over $20,000,000 annually ($100,000,000 over the 5-year plan) of other federal, state, and local funds. Matching requirements have been regularly met and the City doesn't anticipate having difficulty in satisfying these requirements.

OMB Control No: 2506-0117 (exp. 07/31/2015)

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

Although not already identified, publically owned land is always considered as a way to reduce costs for new housing develoments. The City of Duluth regularly considers using tax forfeited properites that Saint Louis County manages. These lands range from homes that are in need of rehab, to severly damaged/condemned buildings, to open lots. Often the City attempts to work with the county to remove the blighted structures and redevelop the land.

Discussion

The City continues to work with area funders, federal, state, and local funders to be able to leverage the federal funds that are received. While local private Foundations experienced a period of reduced funding availability, projections show those amounts to increase. Individual organizations and collaborations have improved at seeking out new and alternative funding sources, in order to maintain service levels within the City. The City also continues to encourage cost-saving-collaborations within the housing, public service, and economic development areas.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Economic Development	2015	2019	Non-Housing Community Development		Economic Development	CDBG: $336,000	Jobs created/retained: 34 Jobs Businesses assisted: 8 Businesses Assisted
2	Tenant Based Rental Assistance	2015	2019	Homeless		Homelessness	HOME: $130,000	Tenant-based rental assistance / Rapid Rehousing: 22 Households Assisted
3	Affordable Rental Housing	2015	2019	Affordable Housing Public Housing Non-Homeless Special Needs		Affordable Rental Housing	CDBG: $400,000 HOME: $27,000	Rental units constructed: 10 Household Housing Unit Rental units rehabilitated: 75 Household Housing Unit Other: 1 Other
4	Affordable Home Owner Housing	2015	2019	Affordable Housing		Affordable Owner Occupied Housing	CDBG: $475,000 HOME: $333,034	Homeowner Housing Rehabilitated: 12 Household Housing Unit

OMB Control No: 2506-0117 (exp. 07/31/2015)

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Community Public Facilities	2015	2019	Homeless Non-Homeless Special Needs Non-Housing Community Development		Communty Structural Public Facilities	CDBG: $448,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 5605 Persons Assisted
6	Neighborhood Revitalization	2015	2019	Non-Housing Community Development			CDBG: $20,000	Other: 1 Other
7	Homelessness	2015	2019	Homeless			CDBG: $142,000 ESG: $183,852	Homeless Person Overnight Shelter: 1000 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 150 Beds Homelessness Prevention: 500 Persons Assisted
8	Public Services	2015	2019	Homeless Non-Housing Community Development		Public Services	CDBG: $178,000	Public service activities other than Low/Moderate Income Housing Benefit: 19600 Persons Assisted

Table 56 – Goals Summary

Goal Descriptions

OMB Control No: 2506-0117 (exp. 07/31/2015)

1	**Goal Name**	Economic Development
	Goal Description	In 2008, the City of Duluth partnered with Duluth Local Initiatives Support Corporation to develop the Duluth At Work program. Duluth at Work is an innovative way to provide assistance to for-profit businesses by training participants with soft skills, practical training, and job specific training. Duluth At Work continues to work with a number of agencies that have relationships with area employers and continue to train prospective employees. In 2015, the city plans to work with SOAR Career Solutions, CHUM, Life House, and Community Action Duluth to accomplish employment goals. Also part of the Duluth at Work program is the Entrepreneur Fund who works with low income small business owners to grow/expand their business in a program called Growing Neighborhood Businesses.
2	**Goal Name**	Tenant Based Rental Assistance
	Goal Description	The Duluth HRA will oversee the administration of housing vouchers for homeless families under the HOME funded Tenant-Based Rental Assistance Program. The HRA provides in-kind services in the administration of the housing vouchers. In 2015, the Duluth HRA will be awarded HOME program funding for tenant based rental assistance for homeless individuals and families to secure permanent rental housing. Case management services will be provided to ensure housing stability.
3	**Goal Name**	Affordable Rental Housing
	Goal Description	The Housing and Resource Connection (HRC)will provide low interest and deferred loans for the rehab of rental properties within the City of Duluth. Owners can apply for low interest loans to renovate properties, which then must serve low to moderate income tenants, less than 80% of AMI based upon household size. Funding includes an existing revolving loan fund and State loans. Also, the Lutheran Social Services project called the Center For Changing Lives which is a development that would provide transitional and supportive rental units for youth in Duluth. The CDBG funding would be utilized for land acquisition at a site in the East Hillside neighborhood. Center City Housing, a Community Housing Development Organization, will continue to conduct predevelopment activities relating to assisting in meeting the affordable housing needs for Duluth, including research for "hardest to house", predevelopment activities for a new 50-unit building and new housing in the Health Care District.

OMB Control No: 2506-0117 (exp. 07/31/2015)

4	**Goal Name**	Affordable Home Owner Housing
	Goal Description	The Housing Resource Connection (HRC) will provide low interest and deferred loans for the rehabilitation of single-family owner-occupied homes in Duluth. Funds will be used for emergency rehabs; homeowner rehab to address code deficiencies, lead paint hazards, energy efficiency; and for the rehab of acquired properties for sale to eligible homebuyers. Healthy home protocols will be used.
5	**Goal Name**	Community Public Facilities
	Goal Description	Community Public Facility projects will include: • Installation of a commercial grade kitchen in the Washington Center (a community building utilized by non-profits programs, city programs, and community club). • Revitalization of two underutilized and blighted lots (Lincoln Park, West Duluth) to add community gardens, edible forests, and other food access and education activities. • Rehabilitation and renovation of the Central Hillside Center, where the Housing Resource Connection (housing provider collaborative of multiple agencies) is housed to make activities and programing more efficient and accessible.
6	**Goal Name**	Neighborhood Revitalization
	Goal Description	Implementation of the City's Citizen Participation Plan and strategic planning with the Community Development Target Areas to identify key implementation strategies. This activity will also work with the Community's At-Home in Duluth neighborhood program
7	**Goal Name**	Homelessness
	Goal Description	Services for homeless, transitional housing, and supportive housing will be completed by agencies eligible for the Housing & Stabilization benchmarks.

OMB Control No: 2506-0117 (exp. 07/31/2015)

8	**Goal Name**	Public Services
	Goal Description	Public Services Activities will include: • Hunger Project is a coalition of three organizations offering food sheleves and hot meals to prevent hunger and malnutrition among the lowest income of Duluth's resendents. • Access to Primary Health Care Services will provide affordable health and dental care, health education, medical social work insurance enrollment assistance, beheavioral health services, and assisted referrals for low income and moderate income uninsured and under-insured community members • JET Food Project will provide access to daily meals and snacks for 500+ youth ages 6-18 while also providing nationally-recognized job training skills that prepare teens for employment in the food service industry. • Basic Needs Center for Homeless Youth, through the Youth Drop-In Center will provide basic needs, referral services, independent living skills classes, and street outreach. • Housing Access Center will help 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.

OMB Control No: 2506-0117 (exp. 07/31/2015)

Projects

AP-35 Projects – 91.220(d)

Introduction

The City relies mostly upon non-profit and neighborhood organizations to carry out the goals of the Consolidated Plan and Annual Action Plans each year. Through an open application process the City of Duluth reviews and evaluates applications as to how they fit in with the plans. Projects are then funded and the City oversees progress to make sure the goals and objectives of the City are being met.

Projects

#	Project Name
1	Housing Resource Connection Program
2	Soar Career Solutions Duluth at Work
3	CHUM Support Services for Employment
4	Growing Neighborhood Business
5	Duluth At Work for Homeless Youth
6	Community Action: Duluth At Work
7	Washington Center Kitchen
8	West Duluth Food Access and Education
9	Central Hillside Building Improvements
10	Duluth Hunger Project
11	Primary Health Care Services
13	Life House "LIFELINE Expressway" Basic Needs Center
22	CDBG Community Development Program Administration
23	Neighborhood Planning

Table 57 – Project Information

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

Each year the Community Development Committee develops funding targets based on needs assessments, data analysis, and input from public hearings. These funding targets then guide the review of applications and funding recommendations. For 2015, the funding targets were set as the following:

Community Development Block Grant

- Affordable Housing, Target: 30%, Recommended: 32.1%
- Economic Development, Target: 15%, Recommended: 15.1%
- Public Facilities, Target: 20%, Recommended: 18.3%
- Public Services, Target: 15%, Recommended: 14.4%
- Planning/Administration: 20%, Recommended: 20%

OMB Control No: 2506-0117 (exp. 07/31/2015)

AP-38 Project Summary

Project Summary Information

OMB Control No: 2506-0117 (exp. 07/31/2015)

1	**Project Name**	Housing Resource Connection Program
	Target Area	
	Goals Supported	Affordable Rental Housing Affordable Home Owner Housing
	Needs Addressed	Affordable Rental Housing Affordable Owner Occupied Housing
	Funding	CDBG: $475,000
	Description	Collaboration between Ecolibrium3, AEOA, Duluth HRA, and One Roof Community Housing to provide housing opportunities for low and moderate income individuals, services include: rehab, weatherization, construction, and ownership opportunities
	Target Date	3/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	97 low income households are estimated to be helped through this project.
	Location Description	Locations are not yet determined. An application process for assistance is used, so locations will be dependent on applicants and program qualifications.
	Planned Activities	• 20 Single Family Rehab • 75 Multi Family Rehab • 2 Acquisition/Rehab
2	**Project Name**	Soar Career Solutions Duluth at Work
	Target Area	
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: $128,000
	Description	SOAR Career Solutions Duluth at Work will provide job skills training, case management, job placement and job retention support 16 participants at or below 50% AMI to obtain employment and maintain their jobs to increase their income by 25% over 3 years.
	Target Date	10/31/2018

	Estimate the number and type of families that will benefit from the proposed activities	16 low income participants will be trained, find employment, and increase their income by 25%.
	Location Description	Participants will be Duluth residents and a high percentage will be from CDBG Target Areas where the services are located.

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Planned Activities	SOAR Career Solutions (SOAR) will provide training, support, case management, job placement, and job retention assistance for Duluth residents at/below 50% of Area Median Income to identify, obtain and keep jobs that increase their income by 25% over three years. Each D@W client will meet with SOAR staff to complete a validated screening tool,the Employability Measure (EM). A case plan will be developed based on the EM's 11 domains of functioning. Intensive support will be provided to help clients overcome employment barriers and become self-sufficient. Clients will be enrolled in SOAR workshops as needed. These include: STEPS, a cognitive program to assist people in changing behaviors and attitudes,building motivation, and gaining a desire to succeed. Job Basics, a short course on workplace culture and expectations; Fast Track, a concentrated course on job searching, marketing oneself, job applications, and successful interviewing skills; The Works, a comprehensive course where individuals discover their career dreams and build skills to reach their goals; Computer Basic Training, a course for clients who need to overcome computer anxiety and become confident with basic computer skills in order to secure employment. Additionally, clients will be referred as needed to other community servicesincluding Community Action's Circles of Support and FAIM programs, Adult Learning Center, Flexwork, Lake Superior College, the Duluth Workforce Center, American Indian Community Housing Organization's culturally specific supportive services, Minnesota Assistance Council for Veterans, and other community SOAR, as a Community Based Development Organization (CBDO) has developed a network of employer partnerships to support the placement of program participants in full-time employment and to customize training to meet the specific needs of employers. SOAR has relationships with area employers Holiday Inn, Essentia Health, Express Personnel Services, Northstar Aerospace, and the small businesses in the Northeast Entrepreneur Fund's Growing Neighborhood Businesses program. Post job placement retention services will include ongoing case management as needed; individual sessions at SOAR, in the workplace, or in the community; phone calls; letters; e-mail contact; and newsletters for three years. Monthly peer support/ongoing education sessions will be planned and offered.
3	**Project Name**	CHUM Support Services for Employment
	Target Area	
	Goals Supported	Economic Development
	Needs Addressed	Economic Development

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Funding	CDBG: $64,000
	Description	CHUM will assist eight LMI individuals with limited or poor work histories in finding jobs and provide supportive services.
	Target Date	10/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	8 low income participants will be trained, find employment, and increase their income by 25%.
	Location Description	Participants will be Duluth residents and a high percentage will be from CDBG Target Areas where the services are located.

	Planned Activities	The project will provide supportive services, including case management, to the target population. Both employees and employers will receive support through the project to ensure their mutual success. Program participants will successfully obtain and maintain employment for three years, during which time they will build a foundation, including obtaining necessary skills and credentials, for ongoing employment at a livable wage with career path potential and realize a minimum of a 25% increase in their income. The program will include the following basic components/steps: Screening and Assessment Potential participants will be screened to determine their career option choices (based on skills and interests), as well as barriers they must address to realize these objectives. Those not ready for this program will be given appropriate referrals to existing employment and job training opportunities. Orientation Those provisionally accepted into the project will participate in a one-week orientation/training program designed by SOAR Career Solutions. This program will include one-half day of basic life skills information (i.e. appropriate dress and language, how to handle child care problems, calling in to work when sick, etc.), as well as job interview skills. The individual, with case management support, is responsible for applying for, and securing a position with one of the participating businesses. Once hired the person becomes a full participant in the project. Case Management and Supportive Services The case manager has three primary responsibilities: a) providing support to the participant while holding him/her accountable in carrying out the work plan; b) providing support to the employer and helping ensure that the participant/employee is meeting job expectations; c) problem solving and accessing resources necessary to help the participant achieve stability and job success. Case management will likely be very intense during the first months of employment with a gradual reduction in support as stability is achieved. Career Ladder Support Case managers will instill in those they are working with beyond initial employment and into developing career plans. Employers will be expected to invest in training their employees. Resources for this (i.e., Lake Superior College, SOAR Career Solutions, Adult Learning Center, etc.) will be made available and shaped to meet the needs of employers and employee/participants. Peer Support Groups will also be organized to provide an opportunity for employees to share not only their problems and frustrations, but also their dreams. Resources can be brought to these meetings (i.e., SOAR, Lake Superior College, Habitat, Housing Resource Center, Early Childhood and Family Education) that can help participants

4	**Project Name**	Growing Neighborhood Business
	Target Area	
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: $64,000
	Description	The Entrepreneur Fund will provide technical assistance and peer support for 8 small business owners with the Duluth Target Neighborhoods to help them grow their business by 25%.
	Target Date	10/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	8 business owners with businesses located in CDBG Target Areas will gain assistance in growing/expanding their businesses.
	Location Description	Participants will be business owners located within CDBG Target Areas.
	Planned Activities	
5	**Project Name**	Duluth At Work for Homeless Youth
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: $32,000
	Description	This program will assist companies such as Home Depot, Goodwill Industries, Cartier Agency, Inc., and Residence Inn to expand employment options by working with the LifeHouse Organization which assists youth ages from 16-20 to become self-sufficient through employment training, education, and other services so that their income will increase by 25% in a three year period.
	Target Date	10/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	Four (4) low income participants will be trained, find employment, and increase their income by 25%.
	Location Description	Participants will be Duluth residents and a high percentage will be from CDBG Target Areas where the services are located.

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Planned Activities	Life House will assist youth, ages 16-20, from CDBG targeted neighborhoods to become self-sufficient through employment training, job placement, education, and other services which lead to a 25% income increase over three years. The Life House Duluth At Work poverty reduction “best practices” include working with a small number of youth that have common needs, developing long term mentorships between staff and the youth, fostering peer support through group training sessions, providing education supports, meeting a youth’s support needs comprehensively, and involving local employers. The program has job commitments from Goodwill Industries, Cartier Agency, Inc, Residence Inn, Home Depot, and McDonald's.
6	**Project Name**	Community Action: Duluth At Work
	Target Area	
	Goals Supported	Economic Development
	Needs Addressed	Economic Development
	Funding	CDBG: $48,000
	Description	The Circle at Work Program will assist local businesses in expanding employment options by providing training, education and other services to LMI participants.
	Target Date	10/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	Six (6) low income participants will be trained, find employment, and increase their income by 25%.
	Location Description	Participants will be Duluth residents and a high percentage will be from CDBG Target Areas where the services are located.

	Planned Activities	The goal of this project is to provide program participants, a targeted population of low-income single mothers, with employment readiness training, job coaching, removal of employment barriers and employment support to assist them with becoming economically self-sufficient; The overall goal is increasing participant income by 25% over a three-year period. Participants in the program will be a part of the Financial Opportunity Center service delivery model at CAD which includes bundling of employment and financial coaching services. The first part of the program provides participants with opportunities to enhance their job readiness skills. The skill training includes resume writing, completing employment applications, interviewing and communication skills, appropriate work attire, handling responsibilities, and financial management skills; This training allows the participants to progress as a group which serves as a support network. After completion of the job readiness training and based upon the needs of the employer for the work to be completed, participants will move into employment opportunities. The training track will also include financial literacy training and CAD's Getting Ahead class to increase social support and community connection. The program has job commitments from CustomerLink, a local employer.
7	**Project Name**	Washington Center Kitchen
	Target Area	
	Goals Supported	Community Public Facilities
	Needs Addressed	Communty Structural Public Facilities
	Funding	CDBG: $175,000
	Description	The City of Duluth will install a commercial grade kitchen in the Washington Center building located in the Hillside neighborhood. The facility would expand use of the community center by neighborhood programming, community club, private groups, and neighborhood events.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	The community center is located in the Hillside Community in an LMI Census Tract with the population of 2,610 people.
	Location Description	310 N 1st Ave West, Duluth, MN 55806.
	Planned Activities	ADD PROJECT SPECS HERE.

OMB Control No: 2506-0117 (exp. 07/31/2015)

8	**Project Name**	West Duluth Food Access and Education
	Target Area	
	Goals Supported	Community Public Facilities
	Needs Addressed	Community Non-Structural Public Facilities
	Funding	CDBG: $165,000
	Description	Acquire and revitalize two underutilized, vacant, and/or flood-damaged lots to form a place for community gardens, an edible forest, year-round greenhouse, and other food access and education activities.
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	A site has been identified for the West Duluth neighborhood food hub which is located in an LMI neighborhood with 2,495 people and an LMI of 52%. The project will also be exploring a second potential site in the Lincoln Park neighborhood, one of Duluth's lowest income neighborhoods and an identified food desert.
	Location Description	The site is at the corner of Grand Avenue and 45th Avenue West, Duluth, MN 55807 at the former site of a flood damaged property and next to a vacant/underutilized property.

	Planned Activities	The City of Duluth has been working diligently to fix and revitalize areas that were damaged during the June 2012 flood. The proposed project site is located in West Duluth on Grand Avenue between 44th and 45th Avenue West. Currently the City owns a large parcel at the site, "Lot A", as it was the former location of a non-residential building that was substantially damaged in the flood and since demolished with grant funds from the Minnesota Department of Natural Resources (DNR). The lot shall remain vacant because of the grant restrictions placed on it after demolition. Neighboring the site is an underutilized parking lot, known as "Lot B". Together these two lots are nearly an acre. The goal of this project is to provide a place for neighborhood residents and students to access fresh, healthy food and expand educational opportunities. A site plan for the project has been developed with assistance from the Duluth Community Garden Program. On Lot A the focus will be on local food access and green space. This portion of the site will have open berry patches, fruit trees, outdoor community space, approximately ten community garden plots, and other gardening amenities including rainwater catchment system, composting, tool shed, and fencing. A year-round greenhouse and/or an area for a seasonal farmer's market may be built on Lot B. The City will also work with local groups to identify a location for a similar space in Lincoln Park that could hold a community greenhouse for growing local food and increasing access to healthy food.
9	**Project Name**	Central Hillside Building Improvements
	Target Area	
	Goals Supported	Community Public Facilities
	Needs Addressed	Communty Structural Public Facilities
	Funding	CDBG: $68,000
	Description	
	Target Date	6/30/2016
	Estimate the number and type of families that will benefit from the proposed activities	500 families will receive assistance throught the programs available at the Central Hillside Center.
	Location Description	The Central Hillside Center is located at 12 East 4th Street, Duluth, MN 55805.

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Planned Activities	The Housing Resource Connection is a collaborative housed in the Central Hillside Center, that includes Ecolibrium3, Arrowhead Economic Opportunities Agency, Duluth HRA, One Roof COmmunity Housing, and the City of Duluth Community Development Division. In order to make room for all of the partners some facility rehabilitation is needed. This rehabilitation would be for primary improvements that are in main and lower levels. The work would include a combination of demolition and construction of office walls, doors, carpet, electrical and data wiring, and painting. Other components will include electronic key/card controlled access and security for a variety of building tenants and a replacement room divider for the main community space on the main level. The improvements would allow for all five agencies of the collarborative to have office space and more efficiently provide housing services to those in need in the community.
10	**Project Name**	Duluth Hunger Project
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: $70,000
	Description	The Duluth Hunger Project is a coalition of agencies working together to prevent and alleviate chronic hunger and malnutrition among the lowest income of Duluth's residents, through congregate meal sites and emergency food shelf programs.
	Target Date	3/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	12,000 participants will benefit from this project.
	Location Description	Programs providing food are located in the Hillside, Lincoln Park, and West Duluth.

	Planned Activities	Collectively, the Duluth Hunger Project provides on-site meals and food shelf services to the lowest income members of the Duluth community. On-site meals are essential for the survival of people who are homeless people and support low-income resendints who are in danger of losing their permanent housing. The downtown area is served by CHUM and the Damiano Center. The Damiano Center serves breakfast and lunch on Monday, Wednesday, and Friday and three meals on Saturday and Sunday. The Damiano CEnter also serves many children from the CEntral Hillside through its Kids' Cafe program. CHUM's on-site meal program servse a primarily homless population at noon on Tuesdays and Thursdays when the Damiano Center is closed, breakfast on Wednesdays, and community meals sponsored by member congregations several times a month. The Salvation Army serves lunch Monday through Friday, primarily for those from Lincoln Park and West Duluth neighborhoods. CHUM and The Salvation Army operate food shelves.
11	**Project Name**	Primary Health Care Services
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: $30,000
	Description	Support the provision of affordable, primary health care, including dental care, for uninsured and underinsured low and moderate income individuals and families in accessible locations within the City.
	Target Date	10/31/2018
	Estimate the number and type of families that will benefit from the proposed activities	6,300 low income people will receive medical and dental services through this project.
	Location Description	4325 Grand Avenue, Duluth, MN 55807

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Planned Activities	The Primary Health Care Services program provides access to affordable health and dental care, health education, medical social work, insurance enrollment assistance, behavioral health services, and assisted referrals for low income and moderate income uninsured and under-insured community members. Medical services include, preventative care and screenings, diagnosis and treatment of acute and chronic illnesses, immunizations, assistance with medication needs, mental health counseling and dental services that incldue preventative, restprative and urgent dental care. The funding for this project contributes to a nurse practitioner/physician assistant.
12	**Project Name**	Life House "LIFELINE Expressway" Basic Needs Center
	Target Area	
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: $28,000
	Description	This program will assistat-risk youth annully, ages 14-20, in Duluth, to address basic needs (food, clothing, shelter) and connect with on-site and community resources that help with stabilization.
	Target Date	3/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	600 homeless or at-risk youth will be served at the Life House Drop-in Center.
	Location Description	102 W 1st Street, Duluth, MN 55802.

	Planned Activities	The drop-in center is a safe place for homeless and at-risk youth to receive the following: • Basic Needs including hot meals, showers, laundry, lockers, clothing, hygeine and baby supplies, and a food shelf. • Referrals to Life House's other program areas (housing, employment, education, and wellness) or to external neccessary services. • Independent Living Skills via informal discussions, daily activities, support groups, and classes. • Street Outreach to locate and build relationships with street youth, provide information and make referrals to Life House and other community services.
13	**Project Name**	CDBG Community Development Program Administration
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: $424,947
	Description	Operation, reporting and monitoring of federally funded activities. Also, these funds assist with the implementation of the City's Citizen Participation process that leads to the developoment of the consolidated Plan and the Annual Action Plan.
	Target Date	3/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
14	**Project Name**	Neighborhood Planning
	Target Area	
	Goals Supported	
	Needs Addressed	
	Funding	CDBG: $20,000

OMB Control No: 2506-0117 (exp. 07/31/2015)

	Description	Implementation of the City's Citizen Participation Plan and strategic planning with the Community Development Target Areas to identify key implementation strategies. This activity will also work with the Community's At-Home in Duluth neighborhood program.
	Target Date	3/31/2016
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	

OMB Control No: 2506-0117 (exp. 07/31/2015)

AP-50 Geographic Distribution – 91.220(f)

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

Geographic Distribution

Target Area	Percentage of Funds

Table 58 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Discussion

We do not have HUD approved neighborhood revitalization areas but we do have locally designated CDBG eligible neighborhoods that are over 51% LMI where efforts are often focused.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The city of Duluth works to provide affordable housing on many levels. The city will utilize sub-recipients to provide services for homeless people, as well as, assist with affordable housing through rental assistance, building new units, and rehabbing existing units.

One Year Goals for the Number of Households to be Supported	
Homeless	1,460
Non-Homeless	0
Special-Needs	0
Total	1,460

Table 59 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	22
The Production of New Units	10
Rehab of Existing Units	85
Acquisition of Existing Units	2
Total	119

Table 60 - One Year Goals for Affordable Housing by Support Type

Discussion

A collaboration of homeless service providers will assist with 1,460 people in 2015. These homeless providers are working to develop a coordinated access plan which will help to provide housing stabilization services. The agencies working together include; American Indian Community Housing Organization, Churches United in Ministry, Safe Haven, Salvation Army, MACV-Duluth, and Center City Housing Corporation.

Another collaboration that focuses on affordable housing as part of the Housing Resouce Connection will assist with the rehabilitation of 86 units. This includes 75 multifamily rehab units, ten single family rehab units, and two acquisition units. The Housing Resource Connection is made up of the Duluth HRA, One Roof Community Housing, Ecolibrium3, and Arrowhead Economic Opportunity Agency.

The Duluth HRA also will manage the Tenant Based Rental Assistance program to assist 22 households.

Finally, Lutheran Social Services will begin the development of 10 affordable permanent units through the acquisition of land to develop the Center for Changing Lives.

AP-60 Public Housing – 91.220(h)

Introduction

The Duluth Housing and Redevelopment Authority manages the public housing units within Duluth, which inclues over 1,000 units.

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

The City of Duluth does not expect to spend any CDBG, HOME, or ESG funds to address the needs of Public Housing. Most of the HRA's public housing units are older, but the HRA is utilizing various resources to keep the units in good repair though its wise use of its annual HUD Capital Fund grant, occasional use of energy performance contracting, and use of general obligation bond funded loans provided by the Minnesota Housing Finance Agency, when appropriated by the state legislature. The HRA has also used its local levy resources to augment such funds when needed. The HRA also intends to submit an application for the Rental Housing Assistance Demonstration (RAD) program for some selected public housing units, which would provide additional funding for public housing capital improvements. Currently there are 1,171 households on the waiting list for public housing units, and 1,380 households on the list for the Section 8 Housing Voucher Choice program. The HRA estimates that it will serve 200 new households in the coming year under the Section 8 program and that it will serve 250 new households under the public housing program.

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

The HRA will continue to communicate with public housing residents and keep them involved through tenant meetings and newsletters. The HRA regularily recomends programs including homeownership programs to public housing residents.

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

NA

Discussion

The City of Duluth works closely with the Duluth HRA to assure that the Public Housing policies and strategies are aligned with the cities strategies in order to best meet the need for housing in Duluth.

OMB Control No: 2506-0117 (exp. 07/31/2015)

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

Introduction

St. Louis County (SLC) is one of many Continuum of Care (CoC) regions in Minnesota. Duluth is geographically located at the southern end of St. Louis County. There are two entitlement communities in SLC, the City of Duluth and St. Louis County.

City of Duluth has long history of working closing with SLC and homeless housing and service providers to address issues that impact persons who are homeless or at-risk of becoming homeless. In 2007, joint efforts between the City and County, along with homeless housing and service providers produced a business plan to end homelessness , Heading Home St. Louis County(HHSLC), A Ten Year Plan to Prevent and End Homelessness in St. Louis County.

The goal of the Ten-Year Plan to End Homelessness and the Continuum of Care, through a countywide perspective and distribution of resources, is to help homeless individuals, families and youth to be rapidly re-housed in the most permanent housing possible, increase their housing stability and the housing security that goes along with stability, and to prevent new occurrences of homelessness. With the understanding that homelessness is not caused merely by lack of shelter, but rather involves underlying, unmet physical, economic and/or social needs, the supportive services provided for the homeless are designed to meet those needs.

In 2014, City and County collaboration is as strong as ever with continued focus on the HEARTH regulations and related activities to develop a coordinated homeless response system that incorporates new prevention, rapid housing and coordinated assessment activities outlined in the new Emergency Solutions Grant regulations and the new Continuum of Care regulations along with former shelter (including transitional housing) outreach and supportive service activities. The HHSLC Leadership Council is the governing and advisory board that oversees the activities of the 10 Year Plan and other homeless initiatives in Duluth and SLC, including the annual CoC funding competition, the Family Homeless Prevention and Assistance Program (FHPAP) state funding competition in SLC and the Emergency Solutions Grant Program funding process for both Duluth and SLC.

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

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

The City of Duluth is part of the St. Louis County Continuum of Care (CoC). The CoC coordinated with homeless providers and has developed a collaborative system to reach out to homeless. An integral part of the system is the Coordinate Access. The service providers have agreed under Coordinated Access to use the Service Prioritization Decision Assistance Tool (SPDAT) as a common assessment tool for all homeless persons. As part of the assessment all individuals and families looking to receiving housing assistance will first undergo a pre-screen administered by 2-1-1 United Way. This first step will help with

OMB Control No: 2506-0117 (exp. 07/31/2015)

prevention and diversion and refer those in need to emergency shelter. The client will then be administered the Vulnerability Index (VI) SPDAT at determined entry points. This is a quick, condensed version of the SPDAT and will give the recipient a acuity score which will determine the appropriate housing solution. The score will assess what program the individual best fits and puts the individual on a wait list if not available units are available. The most vulnerable individuals receive priority for housing. Once matched with the appropriate housing, the client's case manager will administer the SPDAT. The SPDAT measures a variety of issues that can effects a persons stability. The categories can be tracked over time as the SPDAT is administered every 3 months or so. The SPDAT can be inputted into HMIS. This will allow service providers to track stability much more effectively and show with data the progress an individual or family is making toward housing stability.

Addressing the emergency shelter and transitional housing needs of homeless persons

Through the Coordinate Access system persons experiencing a housing crisis will be able to be provided with a housing solution efficiently and effectively. The transitional housing providers, emergency shelters, permanent supportive housing providers, and public housing providers have collaborated on creation of the Coordinate Access System. In doing so the agencies also worked to developed goals and standards for each part of the system for which a client may utilize. For example, in shelter the goal is to reduce bed nights or average stay in shelter before housing. If a person is in transitional housing he goal is to place the client into permanent housing or at least keep the person in transition housing for 6 months rather than the street. If the person is in a permanent housing situation such as permanent supportive housing or public housing the goal is keep that person housed for 6 months. Meanwhile during all stages providers will be working to getting their clients stable income and employment, access to health services, etc.

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

In 2015, the City of Duluth will fund Housing, Stabilization, and Coordinated Access for 1,460 homeless people. This will include the work of six agencies that include; Churches United in Ministry, American Indian Community Housing Organization, Salvation Army, Center City Housing Corporation, Safe Haven, and MACV-Duluth.

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

One of the goals outlined in the SLC Ten-Year Plan to End Homelessness was to establish uniform discharge protocols and procedures that prevent people who are being released from county institutions from being discharged into homelessness. An Adult Protocol Business Plan was completed in 2008. The discharge plan outlines transition process steps, based on an evidence-based model called Critical Time Intervention, a standardized assessment tool that is used by all discharging entities upon client admission to identify those at risk of homelessness, specific services to be 35
offered to all clients and additional services offered to at-risk clients. The Discharge Plan also outlines the roles and responsibilities of the collaborative partner agencies, including coordination, information sharing, staffing patterns for institutional-based and community-based staff, and training. In 2010, St. Louis County received funding to conduct a pilot project with County correctional facilities to implement the discharge plan. Implementation of the project went well, but no new funds were allocated toward discharge planning activities once the pilot project ended. However, many of the established protocols implemented under the pilot continue to be used. No additional work has been done regarding discharge planning, however, discharge activities will be reviewed as the city and county work toward transitioning Duluth's homeless response system under the SLC Continuum of Care to align with the HEARTH Act goals.

Discussion

OMB Control No: 2506-0117 (exp. 07/31/2015)

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The City has identified the following barriers to affordable housing:

- Lack of annual budgeted funding to demolish or repair buildings condemned for demolition or human habitation, allowing blight to persist in LMI neighborhoods.
- The City requires assessments placed on vacant lots where structures have been demolished be paid by any new owner, rendering otherwise buildable infill sites financially infeasible for redevelopment.
- "One-for-one" replacement requirements when structures are demolished on 25 front foot unbuildable lots.
- Sewer utility fees and other utility hook-up fees increase the cost of construction of affordable single-family homes.
- Limited Minnesota Housing funding for rehab of aging single-family structures occupied by LMI households, which leads to higher maintenance costs.
- Lack of a policy to require improvements to foreclosed properties in LMI neighborhoods that are on the vacant property register.
- Inflexible policies related to Comfort System's energy improvement programs that limit access to loans by LMI households, including refusal to subordinate when first mortgages are refinanced.
- Minnesota State Historic Preservation Office policies that create additional rehab costs, such as wooden windows and doors repaired rather that replaced by new historically designed materials.
- Outdated historic property references that trigger SHPO review of affordable housing rehab projects on buildings not eligible for listing, which increases costs and delays.
- Lack of direction from City Administration to enforce existing rental license program.
- No education requirement for owners and/or managers to secure a rental license.
- Lack of direction from City Administration to enforce housing maintenance code.
- Lack of energy standards for existing housing stock that result in higher costs for LMI households living in older homes that are energy inefficient.
- Housing & Redevelopment Authority policies that prevent LMI households with poor rental histories or criminal backgrounds from securing assisted housing.
- HUD HOME Program after-rehab value limit based on 95% of median sales price from the extensive Duluth/Superior metropolitan statistical area, and the value limit not adjusted for homes with three or more bedrooms occupied by larger families.
- HUD HOME Program ruling that disallows use of local exception rents in favor of fair

market rents in HOME assisted affordable rental housing.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

- Support selected demolition of blighted properties in LMI neighborhoods. If funded by Community Development, requirement will be to leave a "clean" site for redevelopment.
- Community Development supported rehab projects will address all needed repairs and updates, including housing code, energy efficiency, and healthy home deficiencies.
- Implement acquisition/rehab/resale activities to address vacant foreclosed properties in LMI neighborhoods.
- Review annual Housing Report sales data to determine if a local study of median sales price would increase after-rehab value limit.
- Require rehab programs receiving Community Development funding to increase energy efficiency in existing homes by 20%, and require funded new construction to meet Energy Star standards.
- Provide funding for tenant-based rental assistance to help the "hard-to-house" and homeless population to secure adequate housing.
- Modify policies to eliminate the "re-instatement" of special assessments on tax forfeit lots that have the potential for redevelopment.
- Support additional historic surveys in the central and western areas of Duluth.
- Support the establishment of inclusionary affordable housing in zoning policies.
- Encourage Comfort Systems to revise their loan programs to be more "user friendly" and to coordinate with the Housing Resource Connection.
- Integrate rental license building inspectors into the "One Stop Shop".
- Work with St. Louis County and the Minnesota Department of Revenue to revise polices to encourage redevelopment of tax forfeit land.
- Strengthen rental license program to include such requirements as common applications and leases, affordable application and damage fees, and timely and consistent enforcement of building standards.
- Reduce property tax valuations to reflect affordable housing restrictions that would prohibit owners from selling at full market rate.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Duluth has identified a number of actions that will address onstacles to meeting underserved needs, foster and maintain affordable housing, reduce lead-based Paint hazards, reduce the number of poverty-lecel families, develop institutional structure, and enhance coordination between public and private housing and social service agencies.

Actions planned to address obstacles to meeting underserved needs

Lutheran Social Services will be developing the Center for Changing Lives, which will provide comprehensive homeless and housing services for youth that are in need of housing. CDBG funds will be used for the land acquisition in the project. Providing food access in Duluth is a growing effort with substantial need, especially in some of the low income neighborhoods that lack access to healthy foods. The West Duluth and Lincoln Park Food Access and Education will help to provide land and a greenhouse for growing food. Tenant Based Rental Assistance is also planned to help with rental assistance for households that would otherwise be homeless.

Actions planned to foster and maintain affordable housing

The Housing Resource Connection(HRC) will be funded to provide information and services from five housing-related agencies on various housing programs in Duluth: One Roof Community Housing, the Housing and Redevelopment Authority of Duluth, the City of Duluth Community Development Department, the Arrowhead Economic Opportunity Agency and Ecolibrium3. The HRC is a one-stop-shop for information on purchasing a home or making your home or rental property a healthy, energy efficient and safe place to live. We offer assistance and programs on renovations, code requirements, weatherization, energy assessment, financial assistance, fuel assistance and healthy homes.

Actions planned to reduce lead-based paint hazards

City of Duluth policy requires all rental and homeowner rehabilitation programs and projects receiving federally funded assistance to coordinate with the Duluth HRA for lead assessment, testing and clearance services. Given the age of Duluth's housing stock that predicts 68% contains lead-based paint, the concentration of low- and moderate-income households in less expensive older units, and the past experience of agencies implementing rehab programs, it is highly probable that all, or nearly all, rehabbed units will contain potential lead hazards.

Actions planned to reduce the number of poverty-level families

Duluth At Work is a collaboration between the City of Duluth and Local Initiatives Support Corporation to help low income people find jobs and increase their income. Duluth At Work has four agencies that prepare individuals for employment at for-profit businesses and low income neighborhood business owners to increase their revenue. The overall goal of Duluth At Work is to give participants significant training, hired, and increase their income by 25% while developing a positive work history over three years.

Actions planned to develop institutional structure

The Housing Access Center will help ensure stable rental housing exists by educating existing and potential landlords and tenants regarding rights and repsonsibilities, mediating disputes between landlords and tenants, and connecting reputable tenants and landlords to facilitate healthy, long-term rental tenancy. Education will include landlord training/rental licensing class, provision of resources on tentant/landlord law and legal forms, Fair Housing training, Ready to Rent classes for hopeful tentants without a positive rental history, classes for high school sstudents. An important part of the center will be mediation initiated by either tenants or landlords who are experiencign challenges. A third activity of the center will provide is to build and maintain a list of reputable landlords to which renters can be referred, as well as a list of "Ready to Rent" tenants.

Actions planned to enhance coordination between public and private housing and social service agencies

The City of Duluth has a long history of collaborating with St. Louis County (SLC) in the delivery of funding and programming for the homeless. Community Development staff have established a strong partnership with SLC staff and have worked closely with them in developing the Heading Home St. Louis County 10-Year Plan to End Homelessness, establishing a governing body to oversee the 10-Year Plan—the Heading Home SLC Leadership Council, the Continuum of Care (CoC) process, and distribution and oversight of federal and state homeless funding that comes to the City and County, through HUD's CoC and ESG programming and through the state of Minnesota's Family Homeless Prevention and Assistance Program (FHPAP). City and County staff work closely with emergency shelters, transitional housing and other housing and homeless service provider agencies under the SLC CoC Process.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

Introduction:

Community Development Block Grant Program (CDBG)
Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	**0**

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income.Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

   N/A

OMB Control No: 2506-0117 (exp. 07/31/2015)

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

   See Appendix:

   CITY OF DULUTH HOME PROGRAM HOMEOWNERSHIP ASSISTANCE, HOMEBUYER ASSISTANCE, AND RESALE GUIDELINES

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

   The City utilizes restrictive covenants to assure affordability during the required period.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

   N/A

Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)

1. Include written standards for providing ESG assistance (may include as attachment)

   See ESG Written Standards Attachment.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

   The CoC coordinated with homeless providers and has developed a Coordinate Access System. The service providers have agreed under Coordinated Access to use the Service Prioritization Decision Assistance Tool (SPDAT) as a common assessment tool for all homeless persons. As part of the assessment all individuals and families looking to receiving housing assistance will first undergo a pre-screen administered by 2-1-1 United Way. This first step will help with prevention and diversion and refer those in need to emergency shelter. The client will then be administered the Vulnerability Index (VI) SPDAT at determined entry points. This is a quick, condensed version of the SPDAT and will give the recipient a acuity score which will determine the appropriate housing solution. The score will assess what program the individual best fits and puts the individual on a wait list if not available units are available. The most vulnerable individuals receive priority for housing. Once matched with the appropriate housing, the client's case manager will administer the SPDAT. The SPDAT measures a variety of issues that can effects a persons stability. The categories can be

OMB Control No: 2506-0117 (exp. 07/31/2015)

tracked over time as the SPDAT is administered every 3 months or so. The SPDAT can be inputted into HMIS. This will allow service providers to track stability much more effectively and show with data the progress an individual or family is making toward housing stability.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

   The City Community Development Committee uses the same process to allocate CDBG and ESG funds, based on an annual open application process, that is open to non-profit and community organizations. In 2015, there were six organizations that applied for ESG funding, and the Community Development Division worked with these agencies to identify capacity and a benchmark system that will allow for funding based on the number of homeless people served.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

   The Community Development Committee seeks out homeless or formerly homeless individuals to serve on the commitee. The Committee has regularly had at least one homeless person appointed, and participates in the policy and funding decisions. Also the Heading Home Saint Louis County Leadership Council has homeless appointees and this groups helps to advise the funding of the ESG funds.

5. Describe performance standards for evaluating ESG.

   See ESG Written Standards Attachment.

Discussion:

OMB Control No: 2506-0117 (exp. 07/31/2015)

Appendix - Alternate/Local Data Sources

1	**Data Source Name** 2014 OEO Point in Time Count
	List the name of the organization or individual who originated the data set. St. Louis County Continuum of Care with the Office of Economic Opportunity
	Provide a brief summary of the data set. This data set was created in January 2014. The sampling is completed annually in January.
	What was the purpose for developing this data set? The data is completed for the Continuum of Care and the department of Housing and Urban Development.
	Provide the year (and optionally month, or month and day) for when the data was collected. January 2014
	Briefly describe the methodology for the data collection. The survey examines one day in January. It compiles Shelter and Transiational Housing usage and looks at counting those who go unsheltered. Given the weather in Jaunary the unsheltered count is not a great reflection of the years' unsheltered homeless.
	Describe the total population from which the sample was taken. It attempts to examine all the homeless population in Duluth.
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.
2	**Data Source Name** 2013 CDBG Annual Report
	List the name of the organization or individual who originated the data set. City of Duluth Community Development Division
	Provide a brief summary of the data set. This is an quarterly report the City of Duluth requires of it's subrecipients.
	What was the purpose for developing this data set? For quarterly monitoring and annaul CAPER report.

OMB Control No: 2506-0117 (exp. 07/31/2015)

	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? While it does not include a few small non-CDBG funded organizations, it does provide a fairly comporehensive estimate of yearly activity in homeless shelters.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? April 1, 2012 to March 31, 2013
	What is the status of the data set (complete, in progress, or planned)? It is a completed dataset.
3	**Data Source Name** Saint Louis County Continuum of Care
	List the name of the organization or individual who originated the data set. Saint Louis County, Minnesota Continuum of Care
	Provide a brief summary of the data set. The dataset is compiled by the CoC and covers bed utilization in Saint Louis County including Duluth.
	What was the purpose for developing this data set? To guide policy and procedure for the Saint Louis County Continuum of Care.
	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? This covers the entire county and includes data for Duluth.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? It is annually updated in January.
	What is the status of the data set (complete, in progress, or planned)? This is a complete dataset.
4	**Data Source Name** 2014 Condemnation List City of Duluth
	List the name of the organization or individual who originated the data set. City of Duluth
	Provide a brief summary of the data set. This dataset is created by the City of Duluth in collaboration with multiple departments and divisions and identifies properties that are condemned for human habitation, condemned for demolition, is registered as vacant, or might be targeted for a possible rehab.
	What was the purpose for developing this data set? To help guide demolition of blighted properties.

OMB Control No: 2506-0117 (exp. 07/31/2015)

	How comprehensive is the coverage of this administrative data? Is data collection concentrated in one geographic area or among a certain population? It covers the entire City of Duluth.
	What time period (provide the year, and optionally month, or month and day) is covered by this data set? It is continually updated. This data was pulled on October 15, 2014
	What is the status of the data set (complete, in progress, or planned)? It is complete but is continually updated as properties become blighted or are removed.
5	**Data Source Name** 2008 - 2012 American Community Survey
	List the name of the organization or individual who originated the data set. U.S. Census Bureau
	Provide a brief summary of the data set. This was derived from the 2008-2012 American Community Survey
	What was the purpose for developing this data set?
	Provide the year (and optionally month, or month and day) for when the data was collected.
	Briefly describe the methodology for the data collection.
	Describe the total population from which the sample was taken.
	Describe the demographics of the respondents or characteristics of the unit of measure, and the number of respondents or units surveyed.

OMB Control No: 2506-0117 (exp. 07/31/2015)

Analysis of Impediments to Fair Housing Choice

January 2015

City of Duluth
Community Development Division
411 W. 1st St
Duluth, MN 55802
(218) 730-5480

Contents

Chapter 1: Introduction 1
What is Fair Housing? 1
Why the City of Duluth Affirmatively Furthers Fair Housing Choice 1
Participants 2
Goals for the AI 2
Limitations 2
What Impediments does the City of Duluth Face in 2014? 3
Chapter 2: Jurisdictional Background Data 4
Who lives in Duluth? 4
Race and Ethnicity: 4
Disability: 6
Familial Status: 8
Income: 8
Home Ownership: 9
Chapter 3: Evaluation of Jurisdiction's Current Fair Housing Legal Status 10
Chapter 4: Identification of Impediments to Fair Housing Choice 12
A: Public Sector 12
1. Zoning and Unified Development Code and Site Selection 12
3. PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders 14
4. Sale of subsidized Housing and Possible Displacement 15
5. Property Tax Policies 16
6. Planning and Zoning Boards 17
7. Building Codes (Accessibility) 17
B. Private Sector 17
Housing Mortgage Disclosure Act 17
C. Public and Private 19
1. Fair Housing Enforcement 19
2. Informational Programs 19
3. Visitability in Housing 20
D. Findings of unlawful segregation or other housing discrimination 21
Chapter 5: Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction 22
Chapter 6: Conclusions and Recommendations 27

Chapter 7: Fair Housing Plan 29
Appendix 31

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 approved in 2010. This analysis will coincide with the City of Duluth's Community Development Division's update of the 5 year Consolidate 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 Furthers 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 victim 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 discus 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 Community Development Division under the Department of Planning and Construction Services 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, and personal testimonials from public input sessions and with a survey conducted by the Community Development Division in 2014 will guide this report. Information regarding zoning and code requirements were supplied from the City of Duluth Department of Planning and Construction Services. Rental information was pulled from the 2013 Housing Indicator Study performed by the Community Development Division. Pulling together both public data sources and City run 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 Community Development Division. Information was solicited from public entities, non- profits, other city departments, citizens and property holders. City staff conducted an online survey, in-person interviews, and facilitated public discussions.

Goals for the AI
With this report the City of Duluth will have a greater understanding of Fair Housing issues that citizens 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, it does not provide an all-encompassing picture. One of the biggest impediments any

community faces is the lack of awareness about housing rights among citizens, and as a result many cases of housing discrimination go unreported. While the city attempts to provide training and outreach through its Human Rights Office and various non-profit housing agencies, many of Duluth's citizens do not have the knowledge of what constitutes housing discrimination or what ramifications exist for discriminatory practices. Using the most comprehensive data sources available and conducting this survey are the best tools to provide a basis of current conditions. It is assumed that all direct and indirect information supplied is accurate including the American Community Survey 2008-2012 Estimates, the City of Duluth Housing Indicator Report, Housing Mortgage Disclosure Act data, and solicited input from citizens, City departments, and housing agencies.

What Impediments does the City of Duluth Face in 2014?

The City of Duluth Faces two impediments:

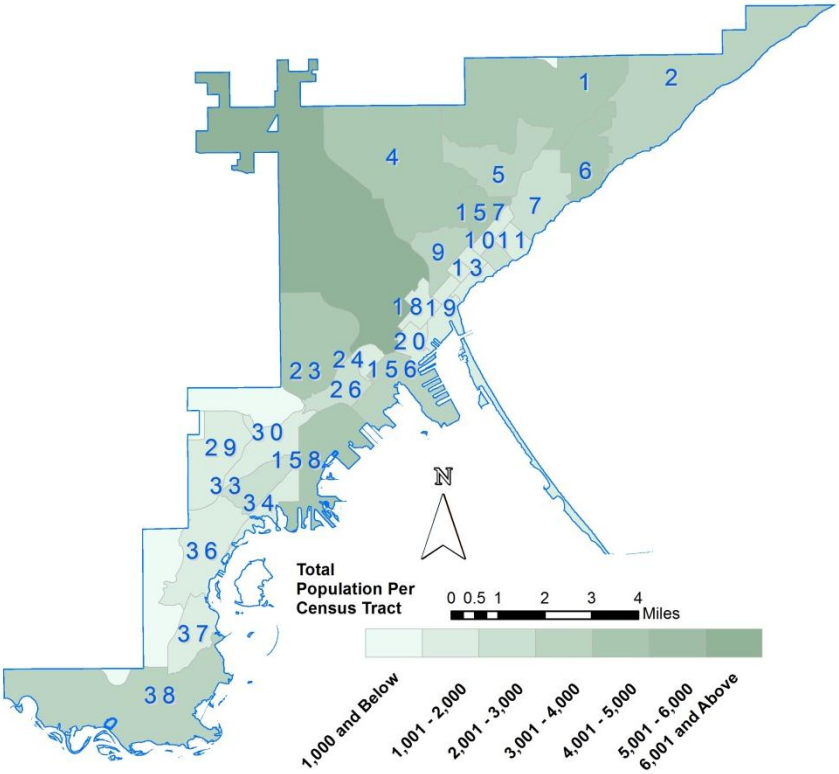
1) Lack of Knowledge of Fair Housing Rights
2) Insufficient data to support enforcement

The community development division will incorporate priorities and objectives in the 2015 to 2019 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.

Chapter 2: Jurisdictional Background Data

Who lives in Duluth?

The City of Duluth is a unique community situated along the northwestern shore of Lake Superior. It is the 4th largest city in the State of Minnesota with a population of 86,239. Duluth's higher education institutions have an important impact as students make up nearly 30% of the population. The student population can skew data on poverty, household size, and housing. A majority of the City's population lives east and west of the city center (census tracts 18 to 20). The lowest populated areas are located in the city center and adjacent areas.



Race and Ethnicity:

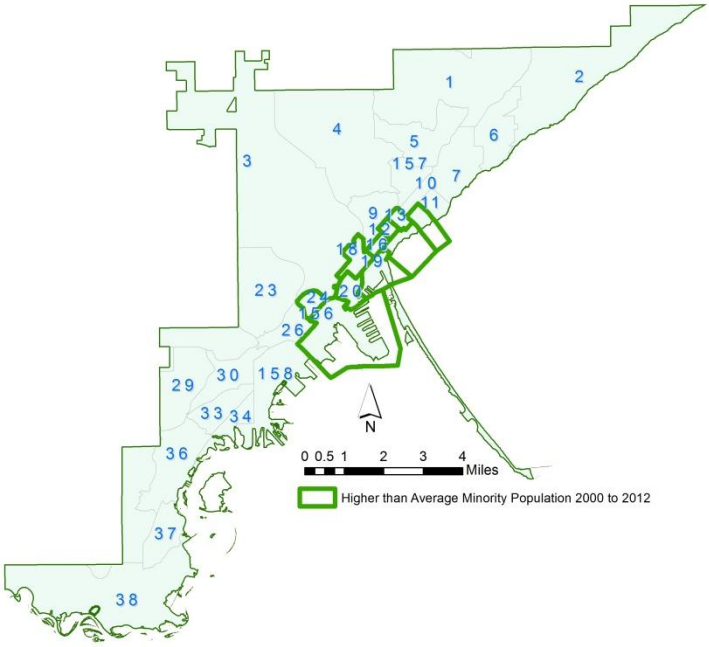
The City of Duluth has a largely White population. The second highest population is American Indian and Alaska Natives with a total of 2,134 (2.5%) followed by African Americans with a total of 1,988 (2.3%). While all minority racial groups have experienced population growth from 1990 to 2010 the population of African American's and persons of Two or More Races have increased the most. African Americans have shifted from just 747 individuals or 0.9% in 1990 to 1,415 individuals or 1.6% in 2000 to 1,988 individuals or 2.3% of the total population in 2010. Data on persons of two or more races was not collected in 1990 decennial census but from 2000 to 2010 there has been an increase from 1,580 individuals or 1.8% to 2,629 individuals or 3.0% of the total population. Unless noted otherwise, data is pulled from the U.S. Census Bureau's Decennial Census in 1990, 2000, 2010, and the 2008 to 2012 American Community Survey.

Race	1990	Percent	2000	Percent	Percent Change 90-00	2010	Percent	Percent Change 90-10	Percent Change 00-10
All Persons	85,493	95.9%	86,918	100.0%	1.67%	86,265	100%	0.9%	-0.75%
White	81,980	95.9%	80,532	92.7%	-1.77%	77,968	90.4%	-4.9%	-3.18%
American Indian/Alaska Native	1,837	2.1%	2,122	2.4%	15.51%	2,134	2.5%	16.2%	0.57%
Asian/Pacific Islander	768	0.9%	993	1.1%	29.30%	1,293	1.5%	68.4%	30.21%
Black	747	0.9%	1,415	1.6%	89.42%	1,988	2.3%	166.1%	40.49%
Other	161	0.2%	251	0.3%	55.90%	224	0.3%	39.1%	-10.76%
Two or More Races	NA		1,580	1.8%		2,629	3.0%		66.39%
All Minority Races	3,513	4.1%	6,361	7.3%	81.07%	8,268	9.6%	135.4%	29.98%
Hispanic Origin	510	0.6%							
Female Head of Household	2,690	7.8%							
Total Households	34,646	100.%							

Source: US Census Bureau Decennial Census 1990, 2000, and 2010

Data was used from the 2010 and 2000 Decennial Census to determine if there were any major shifts in concentration of minority populations. The largest increase of any one minority race classification was in Census Tract 20 which had an increase from 2.29% Two or More Race individuals in 2000 to 6.37% of the census tract in 2010. Census tract 19 had the largest increase in total minority population with an increase of 7.42 Percentage points.

There are 10 census tracts that have had, since 2000, a minority population consistently higher than the City average. These census tracts are all adjacent and located in the Lincoln Park and Hillside neighborhoods. In 2000 these census tracts were home to 19.1% of the City's total population and 42.5% of the City's minority population. In 2010 these census tracts were home to 21.1% of the City's total population and 44.6% of the City's minority population. In 2012 these census tracts were home to an estimated 21.5% of the City's total population and estimated 52.3% of the City's minority population.



Duluth previously had a small Hispanic/Latino population. The 2012 ACS 3 year estimate was at 805 individuals or about .9% of Duluth's Population (+ or – 0.2%). Duluth has one census tract with over 10% of the population of Hispanic Origin and five census tracts with 2.5-5% of the population from Hispanic origin. According to quarterly reports from City of Duluth CDBG Sub-recipients there has been an increase of 381% (160 in 2009 to 611 individuals in 2012) of Hispanic individuals accessing services supported by CDBG funds. Given the small sample size and uniqueness of CDBG funds these results do not necessarily reflect a citywide trend. Hispanic/Latino population is something that will be monitored.

Disability:

The 2008 to 2012 American Community Survey (ACS) found Duluth's population of disabled persons to be at 10,308 or 12.2% of the total population. This is slightly elevated from the state average of about 10.0%. The table below shows the breakdown of persons with disability by type of disability.

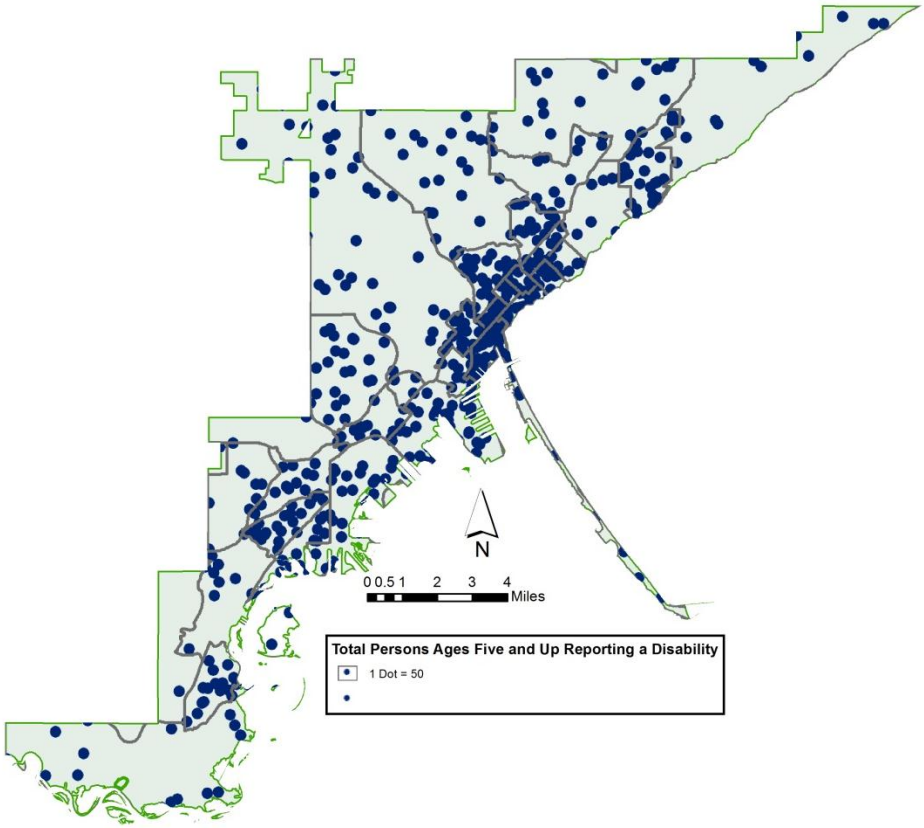
	Population With a disability	Total Population	Percent With Disability
Population under 5 years	18	4,817	0.4%
Population 5 to 17 years	689	11,077	6.2%
Population 18 to 64 years	5,659	57,533	9.8%
Population 65 years and over	3,942	11,110	35.5%
Total	10,308	84,537	12.2%

	Ages 0 - 5	Ages 5 - 17	Ages 18-64	Ages 65 and over
Hearing difficulty	18	50	1,046	1,842
Vision difficulty	0	58	886	537
Cognitive difficulty	0	519	3,134	781
Ambulatory difficulty	0	114	2,433	2,338
Self-care difficulty	0	146	873	790
Independent living difficulty	0	0	1,941	1,645

Source: Non-Institutionalized Population with Disabilities from the 2008 to 2012 American Community Survey.

In 2008 new questions were introduced to the ACS to be more in line with current models of disability. This makes it difficult to assess changes in disability status as there are only a few years of survey data. Even more difficult is that the census data provided does not report below the city level. It is also troublesome that the margin of errors reported are quite substantial for each estimate.

Below is a map created from data provided by HUD. It plots a dot in each census tract for every 50 persons over the age of 5 reporting a disability. It helps represent where the disabled population lives in Duluth. Most of the population is living in the East and Central Hillside neighborhood.



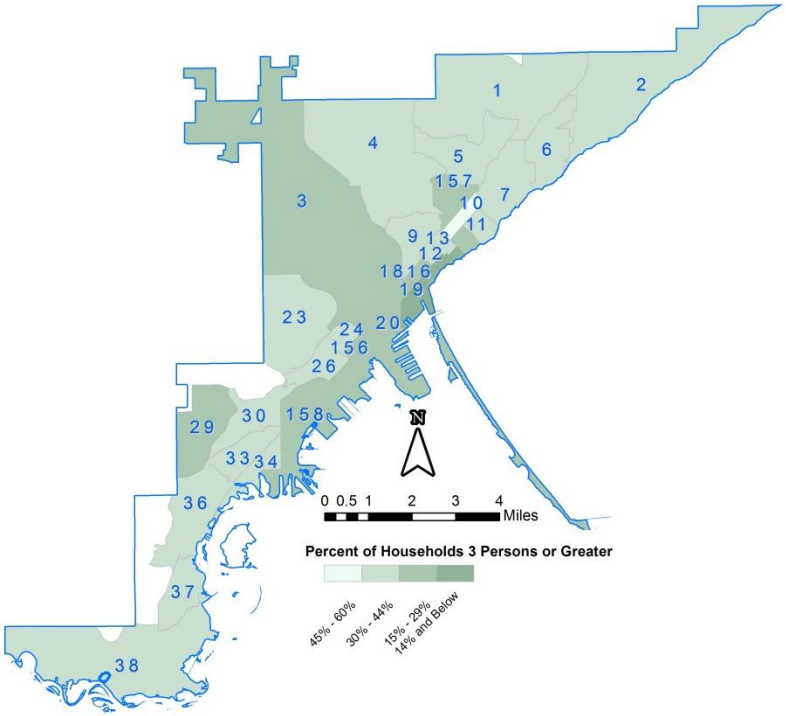
To supplement census data the Duluth Transit Authority were contacted. The Transit Authority operates the STRIDE program. This is a Paratransit program. While data pertaining to trip origination and destination was not available we were able to receive total ridership data. The STRIDE program in 2011 had 25,285 rides. This shows that there is a significant population that requires accommodations. The STRIDE program will pick individuals up by appointment and transport them to a specific designation. Buses in Duluth are also able to accommodate wheelchair users.

While transportation is less of an issue to persons with a disability due to STRIDE, the available housing stock does remain a problem. The disabled population in Duluth can

have a difficult time finding adequate housing in Duluth. The driving force for this problem is the age out Duluth's housing stock. Over 66% of Duluth's housing stock was built before 1960, prior to the 1968 Americans with Disabilities Act. Most houses of that era did not have consideration for persons with disabilities. Secondly, complaints about non-compliance are often overlooked by Life Safety. Since 1960 the City of Duluth has continually update its housing code to meet national standards and accommodate the disabled population. Given the constraints currently on Life Safety they have yet to be proactive in enforcement. This issue can and will be reduced as the department continues to progress. The third issue, is the lack of knowledge of current efforts to retrofit houses, provide better parking, and other resources that are available. There are several groups in Duluth that work specifically with the disabled population. In recent years, as Duluth's CDBG allocation has been reduced, there has been less collaboration with the Community Development Division and these organizations.

Familial Status:

The average household size in Duluth is just over 2.0 persons per household. There are 35,600 households in Duluth. Single person households and two person households make up 35.13% and 33.86% of the total households. Larger families tend to live clustered in areas that are primarily single family residential, which are predominately in Lakeside and West Duluth. The highest census tract with 3 or more persons per households was found to be at 46.8%. Single Parent Households make up 15.2% of all households in Duluth (4% Male householder and 11.2% Female householder).



Income:

The median household income in Duluth is $41,311. The state of Minnesota's median family income is $59,126. Furthermore, the City of Duluth has 21.9% of its population living below the poverty level. The poverty level is based upon household size. For comparison the state of Minnesota's poverty level is only at 11.2% of its population. This

may be skewed for Duluth because of the high college population. The 2007 to 2011 ACS data shows the poverty rate for people in Duluth, specified rates include:

- 42% of families with female head of household are in poverty
- 23% of families with children under the age of 18 are in poverty
- 30% of families with children under the age of 5 are in poverty
- 3% of married couples are in poverty

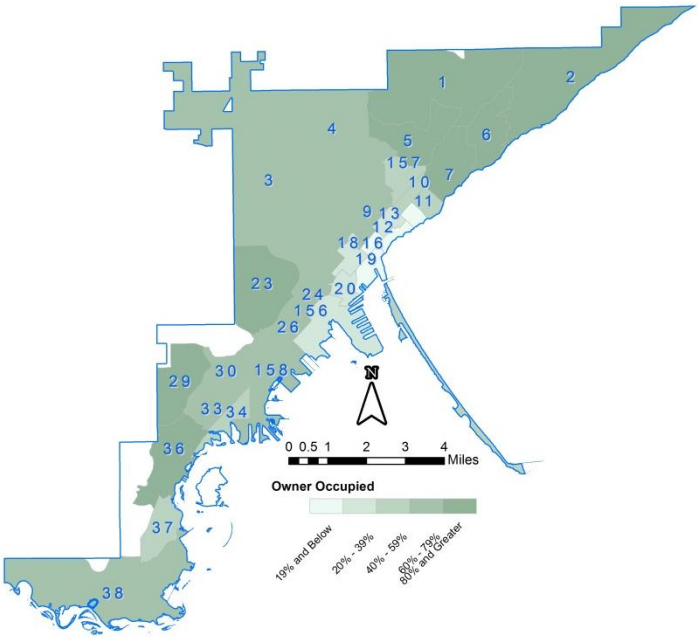
Families with children under 18, especially those with single female head of households have a higher proclivity to being in poverty.

In addition, there is a huge disparity of the number of people in poverty when race is compared, specific rates include:

- 19% of Whites are in poverty
- 34% of Asians are in poverty
- 45% of People who are considered to be more than one race are in poverty
- 63% of African Americans are in poverty
- 68% of American Indian and Alaska Natives are in poverty

Home Ownership:

Duluth has a large student population which contributes to a large rental population. The top five census tracts with over 70% of households reporting to be rental in the 2010 census are all located in the East Hillside/Endion neighborhoods. These neighborhoods are the closest to the University of Minnesota Duluth and the College of St. Scholastica. The census tracts with the highest homeownership rates tend to be scattered along the north edges of the West Duluth and Lincoln Park neighborhoods. Of these locations there are six census tracts with a rate of over 88% owner occupied. Another high percentage census tract is located in the Lakeside neighborhood with over 86.8% owner occupied units.



Chapter 3: Evaluation of Jurisdiction's Current Fair Housing Legal Status

In the past 5 years few housing discrimination complaints from the City of Duluth have been officially submitted to the Department of Housing and Urban Development. In 2012, two cases were investigated by the City of Duluth Human Rights Office. Only one of those cases was sent to HUD for review. This is not to say that housing discrimination is not happening. The Human Rights Officer will attest to receiving many informal complaints about discrimination that do not result in any formal complaints for a variety of reasons. Two main reasons for the low number of formal complaints are education and fear. First, the affected population does not have a clear understanding of their rights nor the resources available through Human Rights Office or the Department of Housing and Urban Development. Second, victims of discrimination, due to the limited amount of property management companies, fear if they complain they will be prevented from receiving housing elsewhere.

The Community Development Division and Human Rights Office of the City of Duluth do provide marketing, literature, and outreach about fair housing issues. The City currently runs Public Service Announcements in a variety of media, has a toll free number for complaints, and works with 2-1-1 helpline to address issues. The response has been mediocre at best. While both offices collaborate with the multitude of housing advocates by hosting forums and attending meetings, there is a disconnect with the greater population. The Housing Rights Office does meet with individuals at various outreach efforts, however, often finds fear prevents any formal action to be taken. A creative, multipronged approach will have to commence to not only educate the public, but property managers and rental property owners.

Coordination among City departments is necessary. The Life Safety Division is tasked with rental licensing but has minimal involvement with fair housing. Community Development is tasked with affirmatively furthering fair housing choice, but has minimal day to day contact with affected protected class citizens. The Human Rights Office has contact with the affected population but has minimal influence on rental licensing which has the ability to effectively address fair housing complaints at a local level.

Common complaints that the Human Rights Office receives from persons with disabilities include; lack of snow removal, lack of accommodation for service animals, and concentration of accessible apartments. This final point is one that the City of Duluth struggles with and has minimal resources to address. In the past ADA accessible apartments were developed by HUD but in recent years there has been a lack of investment into these properties. Duluth has a difficult and expensive building climate which limits new construction. Over 65% of Duluth's housing stock was built before 1960, therefore most of the rental units are not accessible based on current standards. By encouraging new construction and rehabilitation of existing buildings the accessibility issue could be addressed. To help address this situation, the Duluth Housing and Redevelopment Authority (HRA) can provide loans to make housing units more affordable and to make housing units more accessible.

Other complaints that the Human Rights Office and Community Development Division receives are related to race and familial status. These protected class citizens will often complain about being turned away for available apartments for no reason. These complaints are often difficult to substantiate, especially when the effected party does not want to file a formal complaint. The effected party often times does not want to be classified as a “problem tenant” and is usually in such a desperation for housing that they will not file a complaint. In the past the Housing Access Center would act as an intermediary that provided safe and reasonable mediation. However, the Housing Access Center closed in 2011.

Chapter 4: Identification of Impediments to Fair Housing Choice

A: Public Sector

1. Zoning and Unified Development Code and Site Selection

The City of Duluth operates under a Unified Development Code (UDC). All new housing developments must fit under this code. The UDC was last revised in July 2013. The zoning code seems to have a neutral effect on any segregation that occurs in the city.

Physical restrictions for residential sites can often force developments to be more expensive and "price-out" low income residents. The City of Duluth zoning code has made efforts to reduce this effect as much as possible. For example, the zoning code has a requirement that each residential unit have one parking space. Acquisition of land for the use of parking can be an expensive endeavor. However, the parking requirement can be reduced by 30% if located near a mass transit stop. This reduction does not have a direct effect on fair housing but it does increase affordability.

The zoning code has setback requirements for each zoning district. However, the requirements are so minimal they likely do not have a significant impact on affordability of homes. It is important to keep in mind that Duluth has a wide spectrum of housing stock ranging from Residential Conservation (large acre lot) to Form District 9 (mixed use residential building). There are 21 different zoning designations that allow residential buildings. The City of Duluth allows for cluster development and has implemented a form based code allowing for even more flexibility in residential development. These options can be especially useful when developing in environmentally sensitive areas, for which Duluth is abundant. Setbacks can range from 60-foot front yard setback and 25-foot side setback for Rural Conservation to Form District 8, which allows for a no setback commercial/residential mixed use building. The flexibility in building design allows for a wide variety of housing and helps keep development costs down, which increases the affordability of housing.

Often times zoning codes can restrict the number of individuals living in a home which can make it difficult for residential care facilities to operate. The City of Duluth allows Residential Care Facilities for up to six individuals in the RR-1, RR-2, R-2, R-2, and MU-N (Most residential zones). It allows for Residential Care Facilities with seven or more individuals to operate in R-2 and MU-N zones and by Special use for R-1 and other residential zones. Some conflict has occurred when facilities locate in existing single family homes and do not notify the neighbors.

Despite the flexibility for developers in the zoning code there is an elevated concentration of minority residents in the Lincoln Park, Central Hillside, and East Hillside communities. However, when comparing the zoning in these districts to the entire city there is not many differences. The percentage of each zoning district is fairly consistent in each neighborhood.

The census tracts with the highest concentration of minority races are located in and around the central business district. There are no rural-conservation or residential rural zoning districts found in these census tracts. While the census tracts make up about 11% of the City's land, some zoning districts are more highly representative of minority races. A high percentage of the cities form districts are located in the central census tracts. In the case of Form Districts 5-9, 100% of the form districts are located in the aforementioned census tracts. Form districts were introduced as a way to allow a more diverse use of land and give developers greater freedom in building design and site lay out. The form districts are still very new and the City has yet to see much, if any, impact of their implementation. As the economy is recovering and new construction occurs the form districts will hopefully have a positive impact on housing diversity and help create vibrant neighborhoods.

2. Neighborhood Revitalization, Municipal and Other Services, Employment-Housing- Transportation Linkages

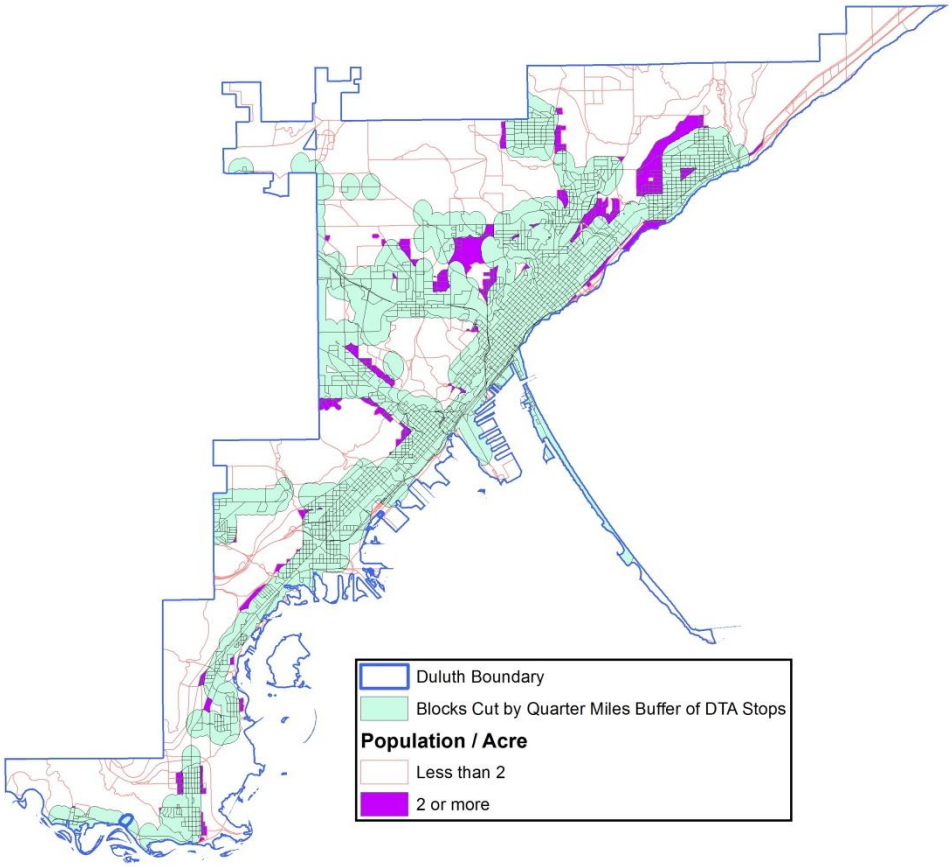
Transportation in Duluth is dominated by car, truck, or van. However, this is driven by those 150% or above the poverty level. According to the 2008 to 2012 American Community Survey nearly 79% of Duluth's population with income at or above 150% of the poverty level drove cars to work. Individuals living below the poverty level drove cars, trucks, vans to work only 65% of the time. Carpooling to work was similar for all incomes, ranging from 10% for those 150% of the poverty level to 11% under poverty. For those under the poverty level, riding public transportation to work was much higher coming in at 12% as compared to just 4% of individuals at or above 150% of the poverty level. Walking to work was also increased for low income individuals.

The City of Duluth is a collaborator in the At Home Neighborhood Core Group. This is a group of non-profit organizations and the City of Duluth Community Development Division and is focused on neighborhood revitalization on core neighborhoods. These neighborhoods correspond with census tracts that have 51% or more low to moderate income residents. In 2011 and 2012 a neighborhood revitalization plan for each core neighborhood was developed with strong citizen involvement. The plans will hopefully strengthen the neighborhood in the long run.

Duluth is a unique city in that it is a long corridor spanning 25 miles southwest to northeast along Lake Superior. This produces challenges in providing equal services to all residents. It is also unique in the wide variety of land uses which creates diverse pockets of residential and commercial areas. Some single family homes are situated on lots as large as 10 acres while others are situated merely a few feet from their neighbor. There are many neighborhood commercial districts and a downtown with buildings 15 stories tall. The well planned road network and bus system allow residents to quickly travel from one end of the city to the other.

The Duluth Transit Authority (DTA) operates a highly connected bus system. They focus on connecting "trip generators," the places that are major origin and destination points.

Even in times of winter emergency the bus system operates an emergency route connecting the major thoroughfares of the city. While it is not an ideal situation to live without a car in a city with so much land area, the bus offers a reasonable alternative. It is estimated that about 5% of Duluthians ride public transit (not including taxi) to work. This is higher than the state average of 3.5%. About 73,550 Duluth residents live within a quarter mile of a designated bus stop. A quarter mile is generally accepted as the furthest most people will walk to utilize public transit. The map below displays just how well the DTA serves the populated areas of Duluth. The purple sections are blocks with 2 or more people per acre. The DTA is starting construction of a new multimodal transit center in the downtown. This will allow for easier transfers between buses and other modes of transportation.



The City of Duluth also has adopted a complete streets ordinance. The ordinance requires that street improvements incorporate the complete streets principles in design. This provides equal access to the road network to cars, buses, bikes, and pedestrians. The highest concentration of population lives in and around the downtown. Having a safe environment for a multitude of transportation options allows for better connectivity to all residents in Duluth.

3. PHA and Other Assisted/Insured Housing Provider Tenant Selection Procedures; Housing Choices for Certificate and Voucher Holders

The Housing and Redevelopment Authority of Duluth owns and manages over 1,000 units of public housing. The public housing program was designed to provide decent, affordable housing for low-income families. Participants must meet federal income guidelines and other eligibility criteria. Rent is based on 30% of adjusted gross

income. Households on the waiting list for the Public Housing program usually have a shorter waiting period, about 2 months for 4 bedroom apartment and 9-12 months for a 2 bedroom apartment than those on the waiting list for the Housing Choice Voucher (HCV) program, which is approximately 18-24 months. While this time frame is not uncommon compared to other communities, it places a significant burden on individuals needing immediate housing. The table below outlines the vacancy rate and waiting list for each program.

	2007	2008	2009	2010	2011	2012	2013
Public Housing Vacancy %	3.9%	2.3%	1.3%	1.3%	1.0%	3.0%	2.0%
Public Housing Avg. Waiting List	747	121	121	153	974	1,014	802
Housing Choice Voucher (unused)	0%	0%	0%	0%	1.0%	1.0%	2.0%
Housing Choice Voucher Avg. Waiting List	1,408	1,617	1,168	1,623	1,800	2,376	1,477

The Housing and Redevelopment Authority's tenant selection process has been approved by HUD. The process involves ranking applicants on a number or criteria. The more criteria an applicant meets, the higher on the waiting list they get placed. Preference is given to applicants that live or work in Duluth, are in need of assisted living programs, are victims under VAWA, are elderly (at least 62 years of age), are involuntarily displaced, or are families with elevated level of lead in their blood. Effort will be made to ensure that accessible units will be first offered to families who may benefit from the accessible features. The HRA may skip low or moderate income families on the waiting list for a family that is extremely low-income to ensure that they meet HUD's requirement 40% extremely low-income of the families admitted to public housing each fiscal year.

Elderly or disabled families may decline offers of public housing for "good cause" and not adversely affect their waiting list position. Applicants must demonstrate that acceptance of the offer would cause undue hardship.

4. Sale of subsidized Housing and Possible Displacement

The HRA, as an entity operating both the public housing and Section 8 Housing Choice Voucher Certificate programs, is also required by HUD to prepare and submit an annual Agency Plan as well as a periodic five-year Plan to HUD, and the HRA is further required by HUD to submit these Plans to the City of Duluth for its review and completion of a certification of consistency with the City's Consolidated Plan. This HRA Agency Plan submission includes the HRA's planned capital improvements to its public housing properties for the upcoming year as well as five years out. The Plan also includes any proposed public housing development, and any planned demolition or disposition of public housing. The HRA has no plans to demolish any public housing units or properties in the coming year. It does expect to add an additional scattered site unit under the acquisition and rehab development method in the coming year with HUD Replacement Housing Funding. The HRA completed a HUD required Section 504

needs assessment several years ago as required by 24 CFR 8.25 and is in compliance, having a sufficient number of handicapped accessible units within its public housing inventory to meet the needs of existing residents and eligible applicants on its waiting list. The agency is also currently undertaking many capital improvements of its public housing properties, including energy-related improvements, at both its high rises and scattered site properties. The City supports the HRA's Family Self-Sufficiency and Section 8 voucher homeownership programs, and is satisfied that residents have access to homeownership opportunities. For a number of years, the City has awarded HOME funds to the HRA for tenant-based rental assistance. This program provides housing vouchers for homeless families and individuals that would otherwise be on the Section 8 waiting list. It allows households that do not currently qualify for HRA's programs to receive a rental voucher, and then work to address their ineligibility issues, such as past unpaid rent or a too recent criminal conviction.

In addition to a Tenant representative on the Board of Commissioners, an active Resident Advisory Board reviews and provides input into the HRA's Agency Plan and capital improvement plans. The membership includes the Presidents of the Resident Clubs from each of the six high-rise buildings. These Clubs have regular meetings that serve as venue to talk about HRA policies and procedures. The City is satisfied that residents have meaningful input into the management of public housing. The HRA is a High Performer under HUD's Public Housing Assessment System (PHAS), which grades the HRA on management operations, physical conditions, Capital Fund administration, and financial condition. The HRA is also a High Performer under the Section 8 Management Assessment Program (SEMAP). The HRA will endeavor to retain its High Performer statuses for both programs.

5. Property Tax Policies

The City of Duluth in 2014 has an effective tax rate of 16.345%. There are several programs offered by St. Louis County that are intended to help reduce property tax. Those programs include, Disability Homestead, Disabled Veterans Market Value Exclusion, Disaster Relief, Green Acres, Homestead Reduction, Property Tax Refund, and Senior Citizen Deferral. Several of these are pertinent to fair housing choice for protected class citizens. Disability Homestead is a reduction intended for individuals who are legally blind or permanently and totally disabled. Similarly veterans who have a 70% disabled rating or higher and were honorable discharged may qualify for a market value exclusion. The property tax refund is intended to cap property tax to a certain percentage of household income. It also prevents property taxes from exceeding a 12% increase if that increase is over $100. Senior citizens who are 65 years or older with an income of $60,000 or less have the option to defer their property tax. That deferment creates a lean on the property and requires that deferred taxes be paid within 90 days of any sale or transfer of the homestead. These property tax reduction programs help in reaching homeownership achievable for all classes in Duluth.

6. Planning and Zoning Boards

The Planning Commission is a board that reviews items such as special use permits, zoning code amendments, rezoning applications, small area plans, and long range plans. One planning commission is required to be a Heritage Preservation Commission member. The Heritage Preservation Commission also has one member is appointed by the St. Louis County Historical Society. The remaining five members are appointed by the City. Members of both commissions are required to be residents of the City of Duluth.

7. Building Codes (Accessibility)

The City of Duluth has adopted the 2007 Minnesota State Building Code and the 2007 Minnesota State Residential Code, which includes the 2006 International Residential Code as amended by Minnesota Rules Chapter 1309.

B. Private Sector

Housing Mortgage Disclosure Act

Data from the Housing Mortgage Disclosure Act for the metropolitan statistical area was used to analyze denial rates. Information regarding race, ethnicity, gender, and income are required to be reported annually. A 5 year average (2008-2012) was used to compare the rates. Averaging 5 years of reporting increases sample size and reduce volatility of individual years. There does not seem to be any glaring issues regarding discrimination.

Duluth annually receives 2,100 applications for Conventional Home Purchases. Of the 2,100 or so applicants about 90% were from white applicants. It is difficult to compare rates from year to year with such a small sample size. For example, in 2012 White applicants had an origination rate of 90% while Native Hawaiian applicants had an origination rate of 100%. It could seem at first glance that Native Hawaiian's receive preferential treatment. However, with only two Native Hawaiian applicants, it is nearly impossible to determine if any discrimination has occurred. Had one applicant been denied, such as in 2009, the origination rate would have dropped precipitously.

In an effort to view more clearly any variations in data the 5 year average of the percentage of applications by race was compared to the percentage of denied applications by race. For example, African Americans make up 0.21% of all applications from 2008-2012. However, African Americans make up 0.55% of all denied applications. This means African Americans are being denied at a higher rate than other racial classifications. To put this in perspective, 7% of all applicants reported do not have data on race. Of the denied applications, 10% were of applicants for which no race

information was provided. This shows that persons for which no Race Data was available is pushing up on the rate of denied individuals. It is difficult to draw any conclusions because while only 7% of applications do not have data on race, it the highest amount of applications next to White applications. A complete table with five year totals and percentages can be found in Appendix A.

When comparing Hispanic or Latino applicants to Not Hispanic or Latino Applicants there is a slightly higher rate of denial. From 2008-2012 there were 62 Hispanic applicants, making up 0.59% of all applicants. Of the 62 applications 17 were denied resulting in 1% of all denied applications being from Hispanic or Latino Applicants. Similar to the race data, those for which no ethnicity was reported resulted in 8% of all applications. However, those applicants for which no ethnicity was reported had a denial rate of 11%, putting pressure upward on the denial rate.

Joint applicants (Male/Female) have a higher origination rate than Male or Female single applicants. There were 4765 joint applications. Of those, 474 applications were denied for a percentage of 10%. There were 1,961 female applicants. 241 were denied for a rate of 12%. While 3,153 males applied for loans, 452 were denied for a rate of 14%.

As income rose so did approval of applications. Applicants with income less than 50% of the median income were denied at a rate of 23% compared to applicants with over 120% or more of median income with a rate of only 8%. For applicants with income of 50% to 79% of median income the denial rate is 14%. Applicants with incomes of 120% or more of median income made up 41% of all applications. The 50% to 79% income group was the second highest percent of applicants making up 21% of all applications.

While there are variations when comparing white to minority applicants, or female to male to joint applicants, or higher income to lower income applicants, there does not seem to be any obvious cases of systematic discrimination. Most variations are small and do not suggest any one classification being discriminated against.

Other Housing Issues

During the 2014 City of Duluth Housing Summit hosted on February 13, 2014 at the Duluth Entertainment and Convention Center, one issue discussed was realtor's avoidance of particular neighborhoods. It was suggested by several members of the discussion group that realtors will often steer new residents to neighborhoods that have higher income. There is a strong correlation between low income neighborhoods and a higher concentration of minority households in Duluth. It is difficult to develop any conclusions about any affects or make any acquisition of true steering because the comments were anecdotal. However, there does seem to be a perception that there is disinvestment by the private sector in Duluth's low income neighborhoods. There has been public investment through the Community Development Block Grant and HOME programs to encourage rehab of properties in effected neighborhoods.

C. Public and Private

1. Fair Housing Enforcement

Since 2007 HUD has assigned 30 cases to the City of Duluth Human Rights Officer to investigate, including one in 2013 and three in 2014. In Duluth, to open a Fair Housing complaint people contact a HUD screener at 800-669-97, if the screener believes the basic elements are present the case is assigned for investigation.

Although the Human Rights Officer continually hears about discrimination from housing advocates he finds that housing advocates commonly do not take 5 minutes to file a formal complaint. It is an ongoing issue that the Human Rights Officer will continue to pursue.

The Human Rights Office and Community Development Division are working closely on reestablishment of the Housing Access Center (HAC). The HAC was an organization that closed several years ago. The HAC helped with tenant remedies and mediation. In the future, if enough funding can be secured a reestablished HAC could work on fair housing enforcement.

2. Informational Programs

It has long been a recognized impediment to fair housing choice in Duluth that there is a lack of information and education about fair housing among citizens and organizations. The City of Duluth partners with several organizations to provide informational pamphlets, radio advertisements, and television advertisements to help address this problem.

The Housing and Redevelopment Authority of Duluth provides fair housing information in its packets to prospective tenants in public housing and persons who secure housing vouchers. Agencies such as Legal Aid, Indian Legal Aid, United Way, Home Line, and The Salvation Army provide general information to tenants and landlords. Legal Aid has been providing trainings annually on tenant rights to landlords. The United Way sponsors a 2-1-1 Information Hotline which offers housing support to inquirers.

The City of Duluth distributes a Housing Resources pamphlet that offers guidance to those experience housing issues. It provides contact information for agencies that handle a wide range of housing issues including fair housing. The pamphlet was last updated in April 2013. It is the result of many agencies coordinating to provide useful guidance to those in need.

The City of Duluth also distributes posters, brochures, and the aforementioned Housing Resources pamphlet at a variety of events. Annually the Community Development

Division and Human Rights Office coordinates a sit down with agencies involved with fair housing. During these discussions, gaps in housing and fair housing services are identified. Some issues related to fair housing include:

- Landlords won't accept people with multiple barriers including homelessness, disabilities, and criminal records
- Education and training around mental health issues
- Informing landlords of policy/regulation changes as they happen, not just at inspection time
- Use the landlord certification/licensure requirement to educate landlords about fair housing

There are several efforts undertaken by the City of Duluth to educate the citizens about fair housing rights but it is hard to quantify how impactful they are. The Human Rights Officer will attest to his efforts to work with affected populations. Oftentimes participants are unaware of what constitutes discrimination under the fair housing act and what does not. He frequently works with people who may have a justified complaint but were unaware of their rights. They are often times afraid to enact those rights for fear that they will be labeled by landlords as "difficult." The rental vacancy rate is very low which constrains choice when searching for housing. Residents who are discriminated against do not want to jeopardize their chances of finding a place to live. A complaint to the City of Duluth or Housing and Urban Development can take weeks if not months to investigate and resolve due to required process and procedures. For many individuals this is too long.

Duluth has many small "mom and pop" rental property operators. Many of these landlords do not have knowledge about fair housing issues such as the legalities of advertising for apartment vacancies, how to accommodate persons with disabilities, and what legal classes are protected. Legal aid does provide trainings for landlords on these topics but it is difficult to attract to the trainings a property owner with only 1 or 2 properties. The City of Duluth Community Development Division conducts an annual Rental Market Survey. This year included in this survey was a short optional form asking landlords if they complete fair housing training and if they were interested in attending fair housing training. There were 17 respondents who are trained in fair housing issues, all of which would be interested in attending free training. However, there were 14 respondents who were not trained in fair housing issues. Of those 14 respondents only 6 were interested in attending a free fair housing training. One respondent who has not undergone training nor interested in a free training explained that they had no employees.

It is important for the City of Duluth to recognize that education of landlords is just as important as tenants. Landlords may not understand that they are practicing illegal procedures nor do they understand the legal ramifications. Having education of the entire community can prevent conflict and reduce discriminatory practices.

3. Visitability in Housing

Some items related to accessibility in the housing code include requirements for handrails, ramp slope, landings in front of doors, and door width. One problem the City of Duluth faces is age of housing stock. Over 65% of Duluth's housing stock was built before 1959. This poses a great obstacle when addressing visitablity. Furthermore, the City of Duluth is mostly built on a hill which prevented most housing units from being designed to be visitable. Only 16.5% of Duluth's housing was built after 1980. The Commission on Disability explained that the biggest impediment to the disabled community was age of housing stock because there is a lack of houses designed to be accessible. The new housing code attempts to address some of these issues. The Community Development Block Grant program has been funding the Housing and Redevelopment Authority to retrofit homes and make them more accessible. This is becoming more necessary as Duluth's population ages. Organizations like Access North also provide programs on a sliding fee to build ramps.

New housing projects that are funded under the CDBG or HOME programs are required to be accessible. The Steve O'Neil Apartments funding in 2013 under CDBG and HOME was designed to be visitable. There is an elevator that will provide access to every floor in the building.

The City of Duluth has not adopted any language to require a certain percentage of homes to be visitable. The City of Duluth is projected to grow by 500 households by 2020. The City currently has an estimated 2% vacancy rate for rental properties. (Deegan, Jessica. "*Duluth Housing and Community Assets.*" 2014 Housing Summit City of Duluth, Duluth Entertainment and Convention Center, Duluth, MN. February 13, 2014) The City of Duluth will continue to fund housing organizations through CDBG and HOME that will retrofit or create new visitable homes.

D. Findings of unlawful segregation or other housing discrimination

There have been no recent cases of segregation or other housing discrimination claims that have come to court. As mentioned in the Housing Enforcement section only a handful of cases are ever investigated by the City of Duluth. None of those have needed court intervention.

Chapter 5: Assessment of Current Public and Private Fair Housing Programs and Activities in the Jurisdiction

The City of Duluth Community Development Division created a Fair Housing Plan as part of the 2010 Analysis of Impediments to Fair Housing Choice. This plan outlined several activities that worked to address the AI's five identified impediments. While the plan included many great ideas, there were many road blocks that prevented complete implementation. One reason for this was the folding of two major fair housing advocacy groups, the Housing Access Program and the Arrowhead Multi-Housing Association. Another reason was the sheer number of goals that the fair housing plan created. There were 25 goals created with multiple actions for each goal, many of which were to be completed every year of the plan. For the plan to be fully implemented a number of organizations were required to dedicate staff and resources, at a time when funding sources were shrinking. However, despite these setbacks the Community Development Division continued to conduct several activities in coordination with the City of Duluth's Human Rights Office. Below is a summary of all the goals and actions that were accomplished, and explanation on why some actions were not undertaken.

Impediment 1 - Lack of Information and Education

Goal A: The City will actively market fair housing through a variety of marketing strategies and mediums to increase the level of knowledge and understanding about fair housing issues.

This goal was achieved, but did not nearly address the need. There have been efforts to produce pamphlets and advertisements on a variety of mediums including information on the City's website about filing a housing discrimination claim. Various housing discrimination posters have been posted at a variety of locations such as the City Hall and housing solution providers. In 2012 a video was produced and played on PACT TV the local cable access channel. However, despite the marketing efforts, there has not been much evidence that education has increased. There still are very few reported cases of housing discrimination being reported to the City's Human Rights Office.

Goal B: Disseminate general fair housing information to 1,000 tenants and landlords.

This goal was achieved successfully, and organizations continue to hand out information to tenants and landlords. The HRA of Duluth disseminates information to all new tenants and all of the transitional housing programs that are funded through CDBG have reported providing this information to their clients.

Goal C: Disseminate fair housing information specific to accommodating people with mental disabilities to 200 tenants and landlords.

This goal was accomplished early on. It was not reported in any CAPER so it is difficult to know the exact number of tenants and landlords that were contacted. When asked, the current staff at the partner locations did not know of the program. The staff was relatively new and might not have known about a program from several years ago.

Goal D: Develop and implement training to increase the knowledge and understanding of fair housing rights and responsibilities, to include reasonable accommodations for all CDBG/ESGP housing providers and tenants.

The Community Development Division continues to provide training to providers and collects data regularly on fair housing rights and responsibilities, as well as, reasonable accommodations.

Goal E: Increase knowledge of fair housing regulations, in regard to accessibility and reasonable accommodations and visibility, for City Attorneys, public and private architects, builders and contractors associated with CDBG and HOME housing projects.

The City of Duluth has not conducted any formal training for Attorney's, architects, builders and contractors associated with CDBG and HOME. However, most if not all organizations we work with have undergone some training on reasonable accommodations and accessibility.

Goal F: Provide an educational workshop that focuses on reducing barriers presented by cultural, educational and socio-economic differences and assists people in gaining the knowledge of, and appreciation for, the diversity that people of color, people with mental and physical disabilities and people of other protected classes bring to our community.

This goal was achieved by organizations hosting events. The University of Minnesota Duluth, Salvation Army, and Community Action Duluth all host workshops and symposiums to discuss such issues in the community.

Goal G: Implement a mortgage lender referral system for persons who have been denied home mortgage loans.

At this point there is not a program in place. Some Agencies have expressed interest in such a program being completed.

Goal H: Incorporate mortgage loan data/information into Community Development's annual Housing Indicator Report.

This goal was achieved. Annually the Community Development Division compiles housing data into the Housing Indicator Report. This does include loan and mortgage data. The report helps guide the City's Annual Action Plan, Consolidated Plan, and Analysis of Impediments.

Impediment 2 - Housing Discrimination against Protected Classes

Goal A: Initiate and disseminate procedures for processing Fair Housing discrimination complaints through the City's Human Rights Office.

This is being completed, although very few cases are being reported.

Goal B: Reduce and eliminate discriminatory practices in the area of housing that have an adverse impact on our community.

Similar to Goal A, this is being actively worked on. The enforcement has not been very successful with only two cases reported in 2012 and only one being investigated and sent to HUD for review. Given a population of over 85,000 and that a large number of complaints during public input sessions are about housing discrimination, the number of reported cases is far too low.

Goal C; Obtain Fair Housing Assistance Program (FHAP) funds from HUD to support the City's enforcement of "substantially equivalent" fair housing laws under the Duluth Human Rights Ordinance.

In 2012 the Human Rights Office was provided funding through FHAP to complete training to accomplish this goal.

Goal D: Establish guidelines for "acceptable" and "not acceptable" lease language, with "acceptable" language encouraged and "not acceptable" language prohibited in all leases used in the City of Duluth.

This was to be completed by the Housing Action center with help from the Human Rights Office, but the HAC shut down before the process could be completed. Some landlords in Duluth have opted to use the State of Minnesota Standard Lease Agreement in place of their own. There is a growing movement to reestablish the Housing Access Center. This could be one the of the issues addressed in the near future.

Goal E: Conduct an audit of the rental application process(es) and the application fees charged by landlords in the City in order to determine if the rental application process and fee charges adversely impact protected class persons.

This was another goal to be accomplished by the HAC. It was not completed.

Impediment 3 - Special Needs Populations are Overlooked

Goal A: Establish a baseline of demographic data regarding Duluth's protected class, special needs populations, to include households of persons with physical or mental disabilities, non-English speaking households and culturally diverse, female-headed, large-family households.

Using the Analysis of Impediments process a baseline is evaluated every 5 years. Issues still remain for obtaining data on specific populations, in particular persons with disability. While Census Data is primarily used, estimates are not always the most reliable. Other sources of data for the community are lacking due the challenge of completing a sufficiently large survey.

Goal B: Identify the rental housing needs of historically underserved, protected class, special needs populations. Target 10% of rehabilitating to affordable rental units and the construction of affordable new rental units to accommodate the needs of underserved, special needs populations.

The HOPE VI initiative Harbor Highlands included visitability elements in its design. The public housing project included apartments designed for the sight-impaired, hearing impaired, and mobility impaired. Units were also designed to be upgradable for accessibility accommodations if such occasions required it.

Goal C: Address issues relating to the Olmstead Decision that will lead to improved housing and supportive service opportunities for people with mental and physical disabilities who are unnecessarily confined to nursing homes and other institutions.

In 2011, Community Development staff, in coordination with the Disabilities and Human Rights Commissions, the Human Development Center, the Center for Independent Living and other service providers for people with disabilities, the Duluth Housing Commission, the Housing and Redevelopment Authority and other affordable housing providers, St. Louis County Social Services and other community partners, was to convene a Task Force. No collaborative task force was created, however organizations may have addressed the Olmsted decision individually.

Goal D: Expand housing opportunities for underserved, protected class, special needs populations by targeting special needs populations that experience multiple barriers to finding permanent, affordable rental housing, for participation in Housing Access Center's newly developed Renters Certification Program.

This was to be completed by HAC and the Center for Independent Living. There is no rental certification program currently.

Goal E: Develop procedures for HRA and other interested organizations to translate fair housing and other vital information to various languages, based on the population data collected on non-English speaking populations in Duluth.

The HRA did not translate their information into other languages. After discussing the translation issue the HRA determined that it would have been too costly to undertake such actions. The felt that HUD could provide the necessary materials if need be in the future. Currently there has been little demand for translated material.

Impediment 4
Housing Code Enforcement

Goal A: Expand the capacity and effectiveness of the Building Safety and Inspection office through the development or purchase of a permitting/ licensing/inspection computer program. The new system will be used to improve the Department's ability to collect, store and retrieve information relating to rental property licensing, permitting and inspection, to include the number and nature of code violation complaints, citations, corrective actions and successful completion of repairs.

This goal was accomplished. The Life Safety Division upgraded its database and permitting system. It allowed the inspectors to catch up on the back log of inspections and reinstate a three year inspection cycle. The division is in the process of migrating to the Citywide system which will allow more usability and provide more access to other related divisions.

Goal B: Establish a Tenant Remedies Program that improves housing options to renters who encounter problems with landlords not making necessary repairs to property, and allows necessary repairs to be made to rental properties currently in violation of the City's building codes.

This program was never established. There is a city ordinance that does address tenant remedies but it's been very rarely implemented.

Goal C: Reduce the number of rental properties being condemned due to lack of repair and maintenance of the building, which will result in reducing the number of tenants being displaced due to condemnation of substandard rental properties.

The City of Duluth works in collaboration with many departments and agencies to work with blighted properties. One program that has helped address this goal is a Multifamily Rehab Program administered by the HRA of Duluth. The HRA sends properties that are at risk of being condemned information regarding their Rehabilitation program. This helps combat unnecessary condemnations allowing for more affordable housing.

Impediment 5
Loss of Affordable Housing Units

Goal A: Increase housing choice for protected class persons by increasing the number of affordable owner-occupied and rental housing units available in Duluth by at least 3%.

This goal has been achieved, although it was not set high enough. The City of Duluth has had an increase in low-moderate income population. The Urban Institute conducted a study of affordable housing in all the counties in the United States. They compiled data from the American Community Survey and Department of Housing and Urban Development on number low-moderate income residents and the number of affordable houses (both subsidized and not). They found that the number of units from 2006 to 2012 increased by 16%. While this does not follow exactly with the 2010-2015 time period it does show the trend that Duluth and St. Louis County is able to invest and increase affordable housing units.

Goal B: Reduce the number of affordable rental housing units lost due to condemnation resulting from landlords' failure to make code violation repairs.

The tenant remedies program designed to reduce the units lost due to condemnation never came to fruition.

Goal C: Decrease the ratio between lost and replaced affordable housing units.

Many affordable housing projects have been supported under CDBG and HOME grants. While we have not been able to track lost affordable housing units we do have information that shows that the number of affordable units has increased. The difficult part is tracking dilapidated but affordable units that may have been condemned and/or demolished.

Chapter 6: Conclusions and Recommendations

The City of Duluth has been affirmatively furthering fair housing through its CDBG and HOME programs. Implementation of the 2010 Fair Housing Plan was not complete and will be incorporated into the following goals. By analyzing various data sources and working with a variety of organizations involved in fair housing issues, the impediments to fair housing choice are as follows:

1) Lack of Knowledge of Fair Housing Rights
2) Insufficient data to support enforcement

These two impediments will guide Fair Housing Strategies for the City of Duluth's Federal Funding. There are many issues that can indirectly influence fair housing choice. For example, in 2010 it was found that loss of affordable housing was an impediment. While supply of housing can effect housing choice it is not necessarily an impediment. The City of Duluth is experiencing growth in middle income jobs. This population growth has strained all housing in Duluth. The City of Duluth will continue to use its CDBG HOME ESG funding to encourage all types of housing and help low income residents secure affordable housing. All of the City's federally supported projects are fully compliant with fair housing laws and helps ensure fair housing for all that seek it. The fair housing plan will work to address the housing market that is not directly influenced by federal funds and work to address a market that allows some discrimination to go unchecked.

1) Lack of Information and Education

It is very clear that there is a lack of education and active education about housing rights in Duluth. Many non-profit agencies, the Human Rights Office, and Community Development Division provide outreach to affected individuals due to budget constraints, many organizations have scaled back general educational efforts to focus on the core goal. Some organizations like Legal Aid do promote annual trainings which have become more and more critical. However, with the closing of the Housing Access Center there has been a large gap in not only educating the public but coordinating organizations that have loose associations with fair housing issues. Many people the Human Rights Office work with may have cursory knowledge of what constitutes a fair housing complaint, but are unaware of how to pursue and provide proper evidence of discrimination. There is not much hope that this issue could be tackled without a strong agency and a shift in the funding climate.

Public input suggests that discrimination against protected classes is occurring. It is unclear however, if discrimination is intentional or not. Almost 35% of landlords manage 5 units or less and most likely do not have rigorous training on fair housing issues. The City of Duluth Community Development Division asked property owners during the 2013 annual rental survey if they currently train staff in fair housing requirements and if they would be interested in attending a free training. Of the 33 respondents there were 23 organizations who were interested in fair housing training and 17 who already undergo training.

2) Insufficient data to support enforcement

Duluth's size prevents access to resources to conduct testing and there has not been of any comprehensive study of the issue. However, in most public input sessions that the City of Duluth conducts either through Community Development or the Human Rights Office, households report difficulty obtaining housing due to race, familial status, or disability. It would be worth exploring options if the City of Duluth could significantly reduce if not end housing discrimination. The City of Duluth Life Safety Division had until recently a three year backlog of units that were due to be inspected. They have managed to clear the backlog but now face the daunting task of enforcing the housing code. This pressure on just the physical part of housing has prevented any work to be completed on policies related to license requirements. Currently the licensure program is merely a fee that landlord must pay. It does not require any training or certification from landlords, especially training on fair housing issues.

Housing code enforcement is something that affects the other impediments. Lack of enforcement can lead to less accessibility and unaccountable landlords. Code enforcement was an issue in the previous Analysis of Impediments and continues to be one today. However, despite still being an impediment the Life Safety team has taken great efforts to enforce the housing code. They implemented a new database system which was suggested in the previous Fair Housing Plan. They also have managed to clear their backlog of rental properties and are now able to keep the 3 year inspection schedule. They also have worked with the Police Department to find resources to address simple compliance issues that were unmet due to lack of resources. Efforts are being made so that data sharing can occur between Life Safety and other City of Duluth departments. Life Safety has the legal power to address issues in fair housing and should be a vital tool in eliminating impediments to fair housing choice.

Chapter 7: Fair Housing Plan

The strategies below are items that the City of Duluth will work to accomplish before 2019. Previous fair housing plan's left many strategies unaccomplished. This happened for 3 reasons. First, the goals were left for housing providers to accomplish with no accountability. When the Housing Access Center closed many goals went unaccomplished. Second, the volume and extent of the strategies did not provide enough time nor resources to accomplish the goals. Third, there was a lack of accountability due the limited ability to measure accomplishments. This fair housing plan narrows the focus to items that the City can accomplish and track. It also reduces the goals from 23 goals to 6 targeted goals. This plan will provide strategies that will be targeted, do not require additional resources, and can be measured and reported on in the City of Duluth's Consolidated Annual Performance and Evaluation Report.

1) Lack of Information and Education

Strategy 1A: Rental License Flier and Marketing

The Community Development Division will work closely with City departments to disseminate fair housing information. One strategy is distributing through the Life Safety Division fair housing materials to property owners who receive a rental license. Another strategy is having a resource page on the City of Duluth website linked to the rental license web page. Information that could be disseminated may include information about rental dispute mediation, upcoming trainings, governmental resources, and rights and responsibilities of renters and property owners. There are about 5,000 rental licenses each year. It will be imperative that applicants be informed of these resources during the licensure process.

Strategy 1B: Required training to Permanent Supportive and Trans Housing Providers

The City of Duluth Community Development Division will require of its Permanent Support Housing and Transitional Housing sub-recipients a training on Fair Housing. While the City's sub-recipients have met the requirements for fair housing we want to ensure that the staff at the sub-recipients receive continual training. The City has found that the providers have staff turnover and that training in fair housing conducted by the city can lag. The City will be proactive in training which will ensure compliance for federal funding by sub-recipients. It will also aid in insuring strategy 1C is completed.

Strategy 1C: Require Permanent Supportive and Transitional Housing Providers to educate tenants on Reasonable Accommodations and Fair Housing Rights

The City of Duluth Community Development Division has several contracts through CDBG/HOME/ESG with providers of Permanent Supportive Housing and Transitional Housing. As part of the contract process the Community Development Division will incorporate new requirements for residents of these facilities. Each household, as part of their transition to a more stable housing source should be well educated in their housing rights. The training will address issues such as what is protected and is not

protected under the fair housing act of 1968, what is a reasonable accommodation, how to make a fair housing complaint to local and federal officials.

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

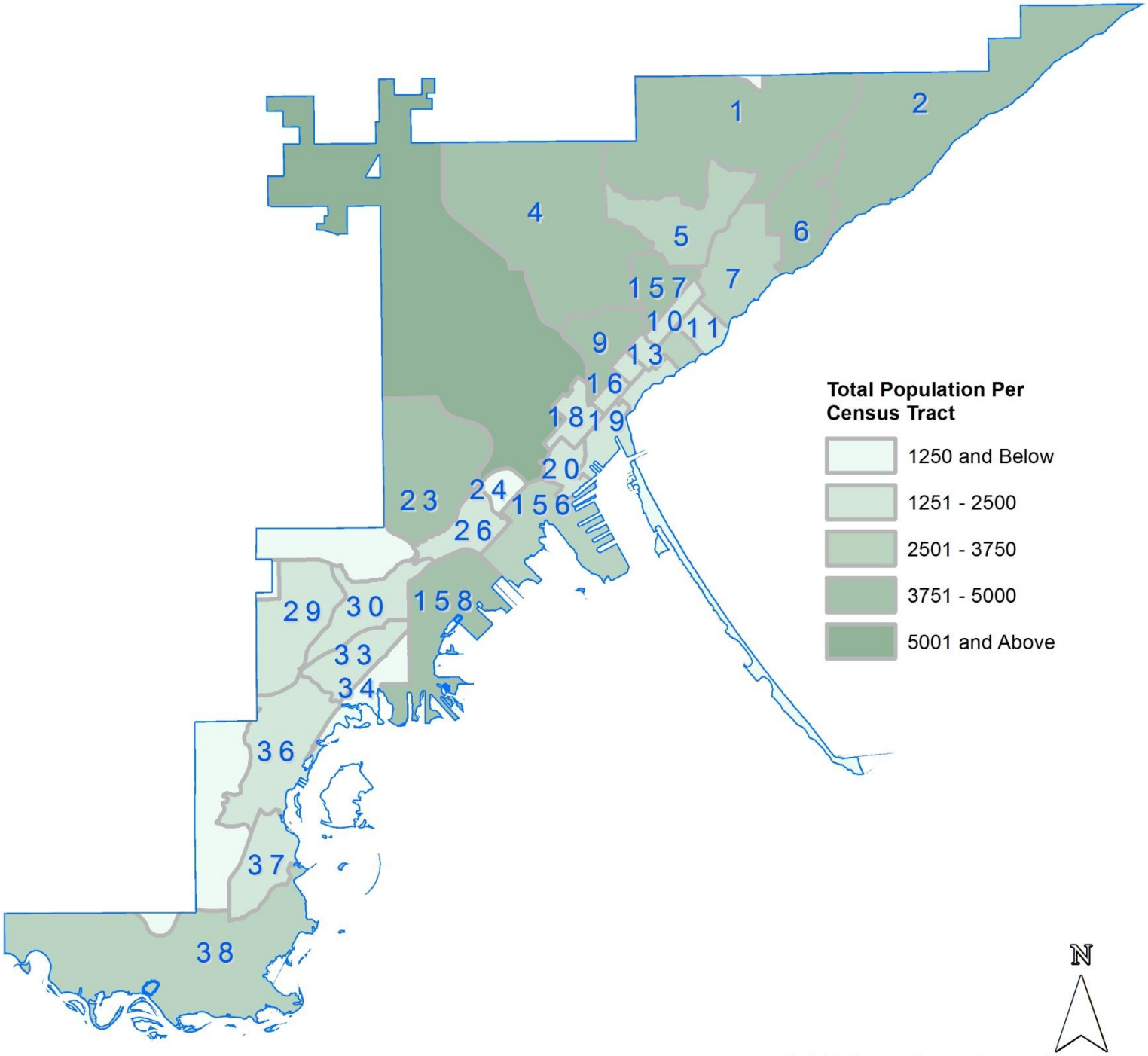
One issue that has suppressed fair housing enforcement is the lack of hard data available. Current systems do not provide an effective means of reporting complaints. While housing advocates continually bring up various fair housing complaints in a variety of forums there is not a sufficient way to aggregate the data. Furthermore, the client's claims are often anecdotal and it is difficult to corroborate the claims without a formal complaint to the City's Human Rights Officer. Citizens can file complaints directly the Human Rights Office but do not. Other means to gather data will be important in crafting processes that address holes in enforcement.

Strategy 2B: Work with Police, Life Safety, and the Human Rights Office to identify gaps in enforcement
Research for the Analysis of Impediments to Fair Housing Choice found that while housing discrimination may be occurring, the departments tasked with enforcing the fair housing act are not being directly informed. Life Safety which does rental licensing does not consult with the Human Rights Office about rental property owners who violate Fair Housing Laws.

Appendix

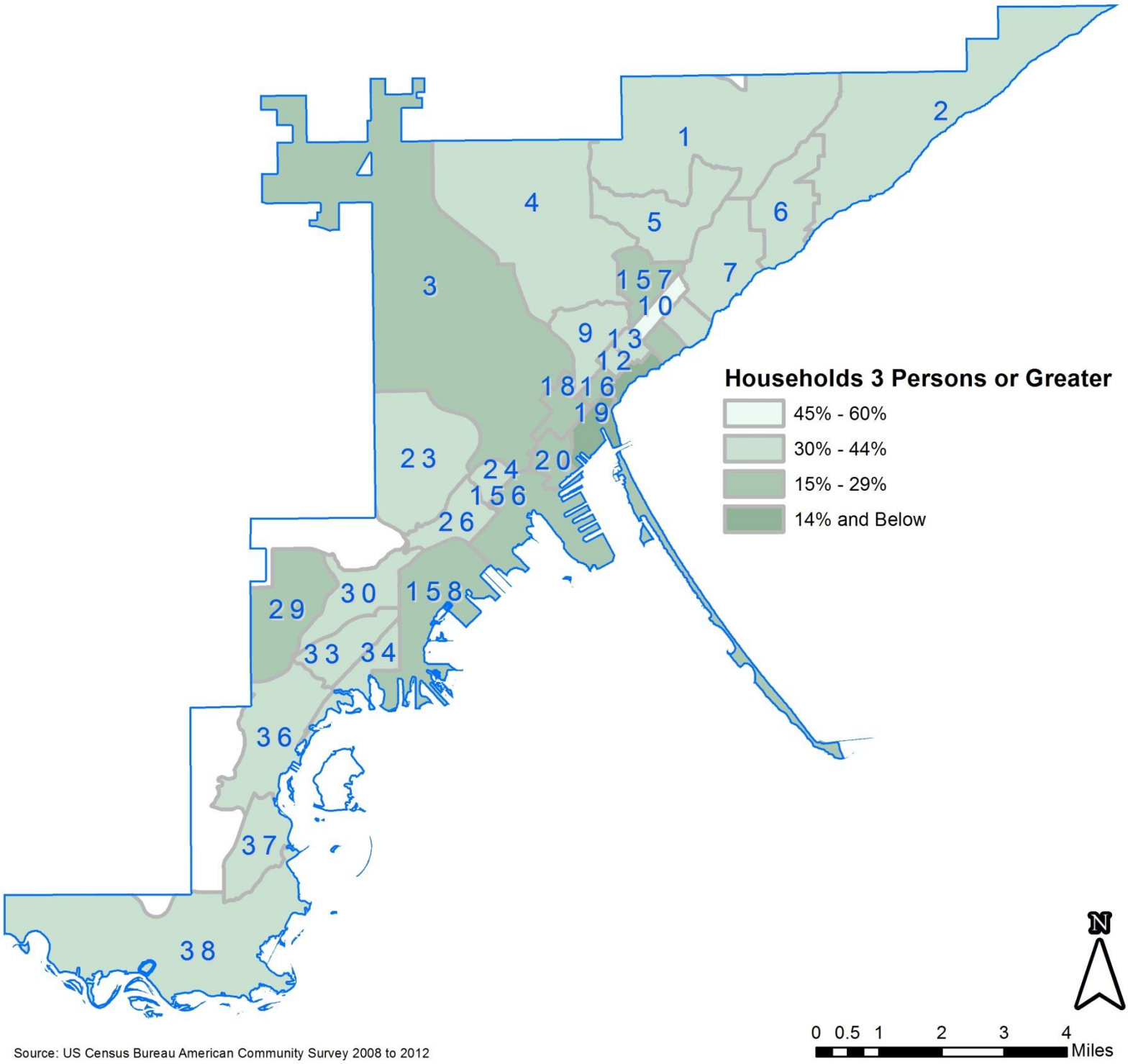
Total Population ..... A
Households 3 Persons or Greater ..... B
Percentage Owner Occupied C
High Concentration of Minority Population ..... D
Comparison of Race ..... E
Disability Status Maps: Total Disabled Ages 5 and Up ..... G
Disability Status Maps: Total Disabled Ages 16 to 64 ..... H
Disability Status Maps: Total Disabled Ages 65 and Up I
Disability Status Maps: Employment Disability ..... J
Disability Status Maps: Difficulty Going Outside the Home ..... K
Disability Status Maps: Self-Care Disability L
Disability Status Maps: Mental Disability ..... M
Disability Status Maps: Physical Disability ..... N
Disability Status Maps: Sensory Disability ..... O
Population Near Bus Stop ..... P
Housing Mortgage Disclosure Act ..... q
Census Tables ..... S

Total Population



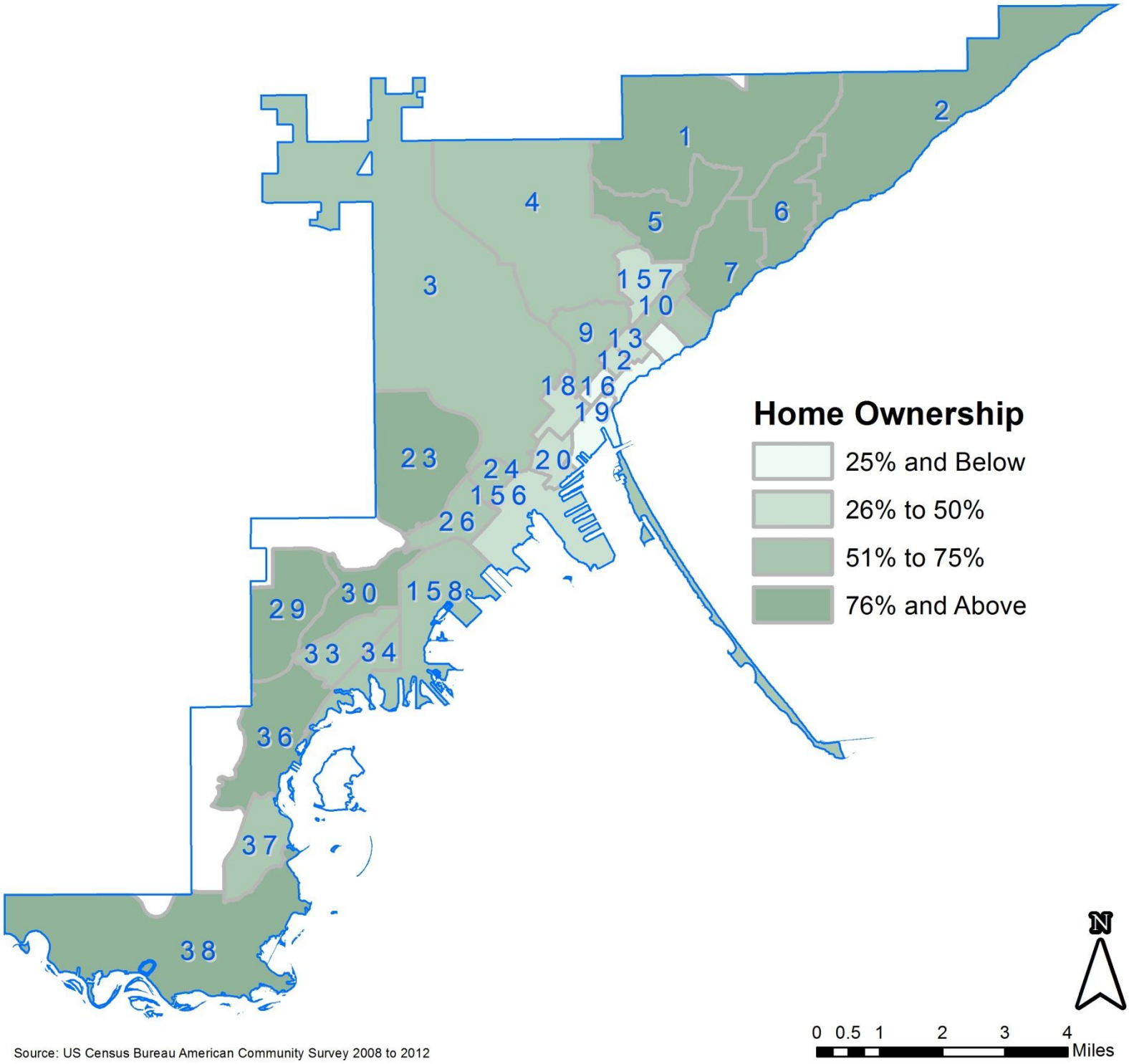
Source: US Census Bureau American Community Survey 2008 to 2012

Households 3 Persons or Greater



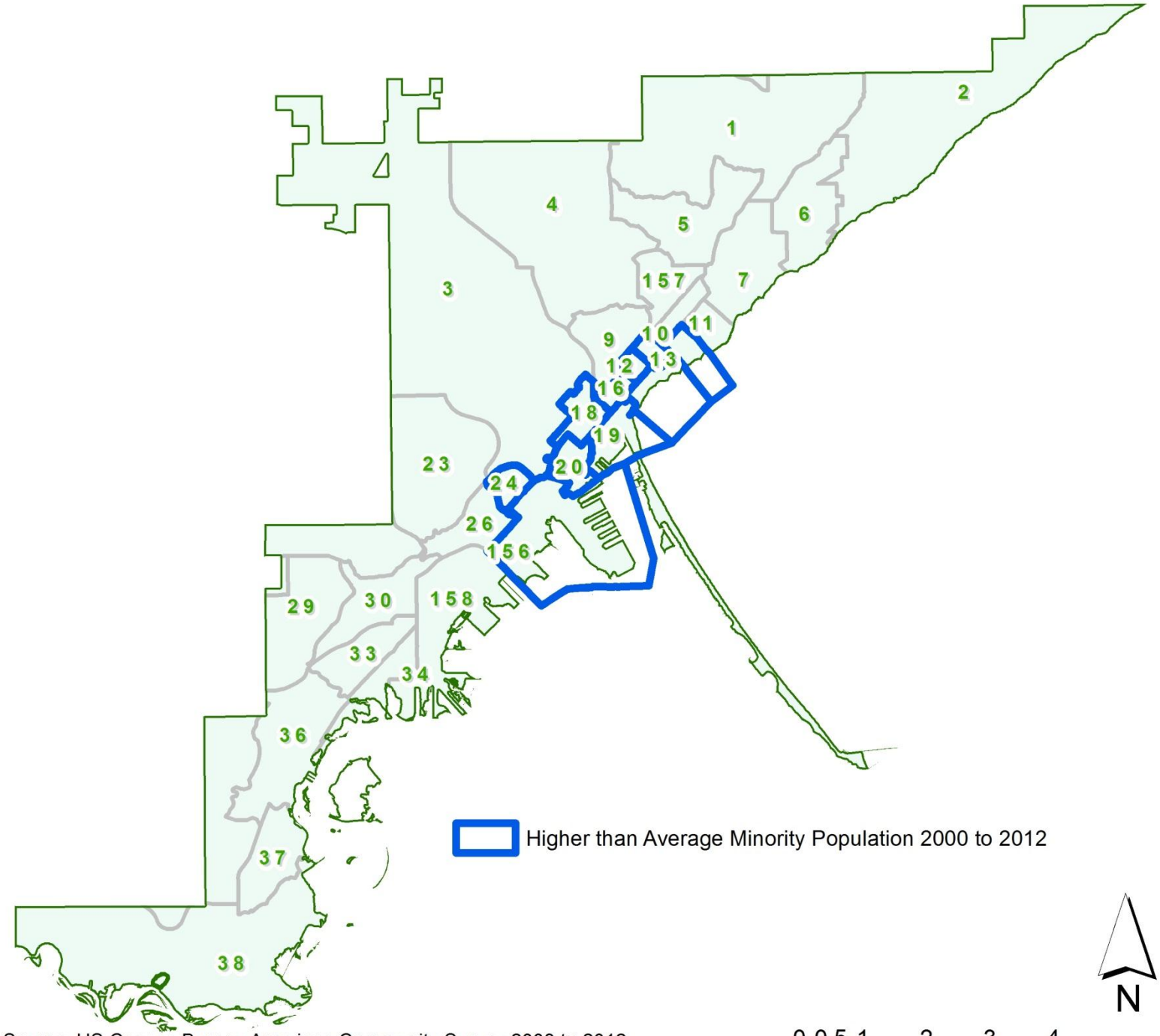
Source: US Census Bureau American Community Survey 2008 to 2012

Percentage Owner Occupied



Source: US Census Bureau American Community Survey 2008 to 2012

High Concentration of Minority Population



Source: US Census Bureau American Community Survey 2008 to 2012, 2000 Decenial Census

Comparison of Race

2012					
	Total	White Alone	% White Alone	Minority Population	% Minority
Census Tract 19	1,720	1,119	65.1%	601	34.9%
Census Tract 156	3,016	2,104	69.8%	912	30.2%
Census Tract 12	1,698	1,251	73.7%	447	26.3%
Census Tract 17	1,661	1,273	76.6%	388	23.4%
Census Tract 16	1,555	1,211	77.9%	344	22.1%
Census Tract 14	2,635	2,104	79.8%	531	20.2%
Census Tract 24	1,224	983	80.3%	241	19.7%
Census Tract 13	1,754	1,442	82.2%	312	17.8%
Census Tract 20	1,591	1,359	85.4%	232	14.6%
Census Tract 18	1,694	1,490	88.0%	204	12.0%
In Census Tracts	18,548	14,336	77.3%	4,212	22.7%
Citywide	86,239	78,191	90.7%	8,048	9.3%
Percentage of minority population living in area				52.3%	

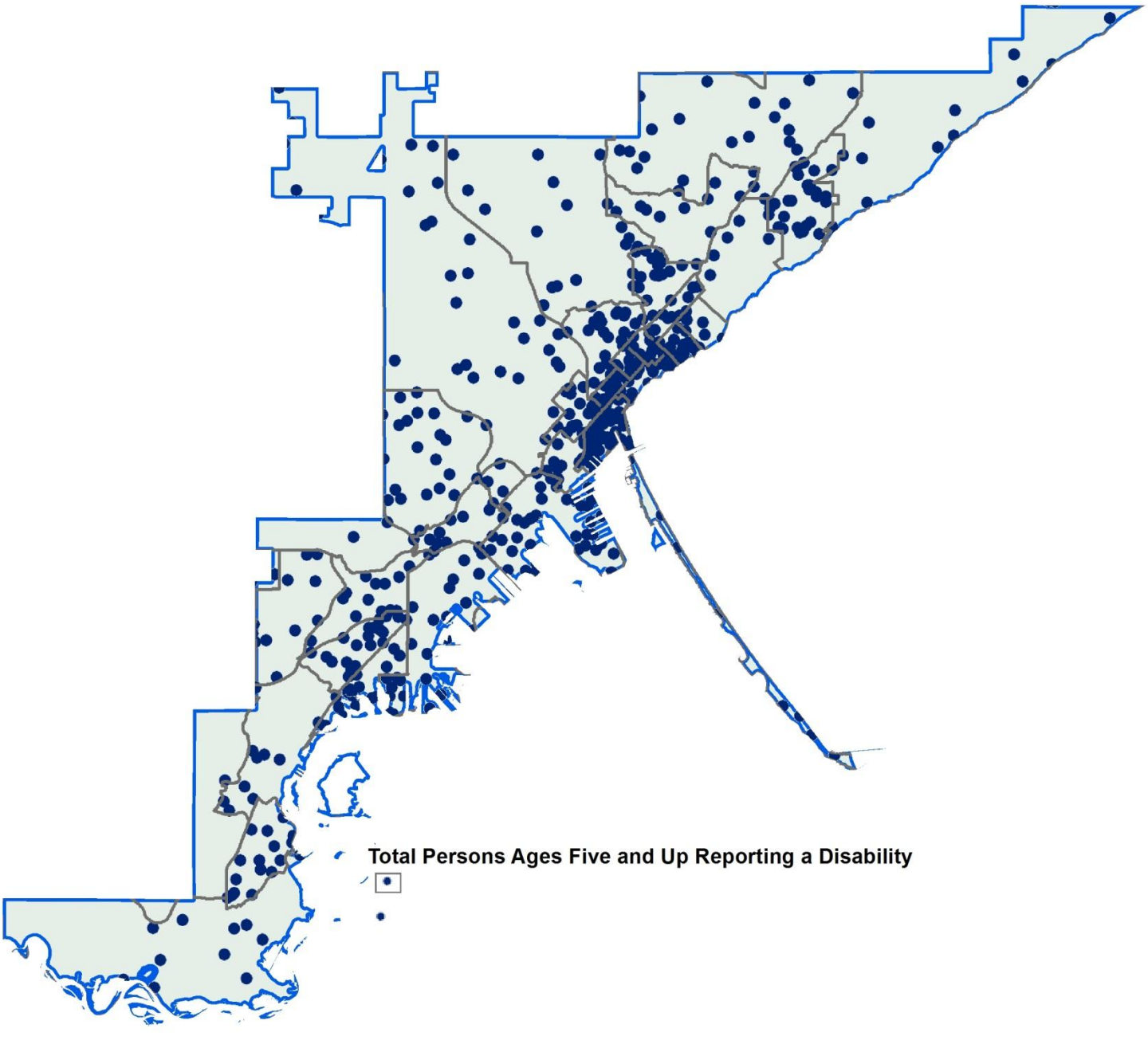
2010					
Geography	Total	White alone	% White Alone	Minority Population	% Minority
Census Tract 16	1,512	1,054	69.7%	458	30.3%
Census Tract 18	1,839	1,324	72.0%	515	28.0%
Census Tract 19	1,917	1,475	76.9%	442	23.1%
Census Tract 156	3,082	2,384	77.4%	698	22.6%
Census Tract 12	1,637	1,323	80.8%	314	19.2%
Census Tract 17	1,454	1,181	81.2%	273	18.8%
Census Tract 13	1,812	1,497	82.6%	315	17.4%
Census Tract 20	1,225	1,028	83.9%	197	16.1%
Census Tract 14	2,602	2,233	85.8%	369	14.2%
Census Tract 24	1,099	976	88.8%	123	11.2%
In Census Tracts	18,179	14,475	79.6%	3,704	20.4%
Citywide	86,265	77,968	90.4%	8,297	9.6%
Percentage of minority population living in area				44.6%	

Comparison of Race

2000					
Geography	Total	White	% White Alone	Minority Population	% Minority
Census Tract 16	1,599	1,129	70.6%	470	29.4%
Census Tract 18	2,077	1,538	74.0%	539	26.0%
Census Tract 14	2,578	2,332	90.5%	246	9.5%
Census Tract 12	1,694	1,419	83.8%	275	16.2%
Census Tract 19	1,778	1,500	84.4%	278	15.6%
Census Tract 17	1,554	1,343	86.4%	211	13.6%
Census Tract 25*	879	760	86.5%	119	13.5%
Census Tract 13	1,822	1,579	86.7%	243	13.3%
Census Tract 20	1,311	1,140	87.0%	171	13.0%
Census Tract 27*	1,285	1,122	87.3%	163	12.7%
Census Tract 24	1,202	1,105	91.9%	97	8.1%
In Census Tracts	16,577	13,862	83.6%	2,715	16.4%
Citywide	86,918	80,532	92.7%	6,386	7.3%
Percentage of minority population living in area				42.5%	
*Census Tracts 25 and 27 are now Census Tract 156					

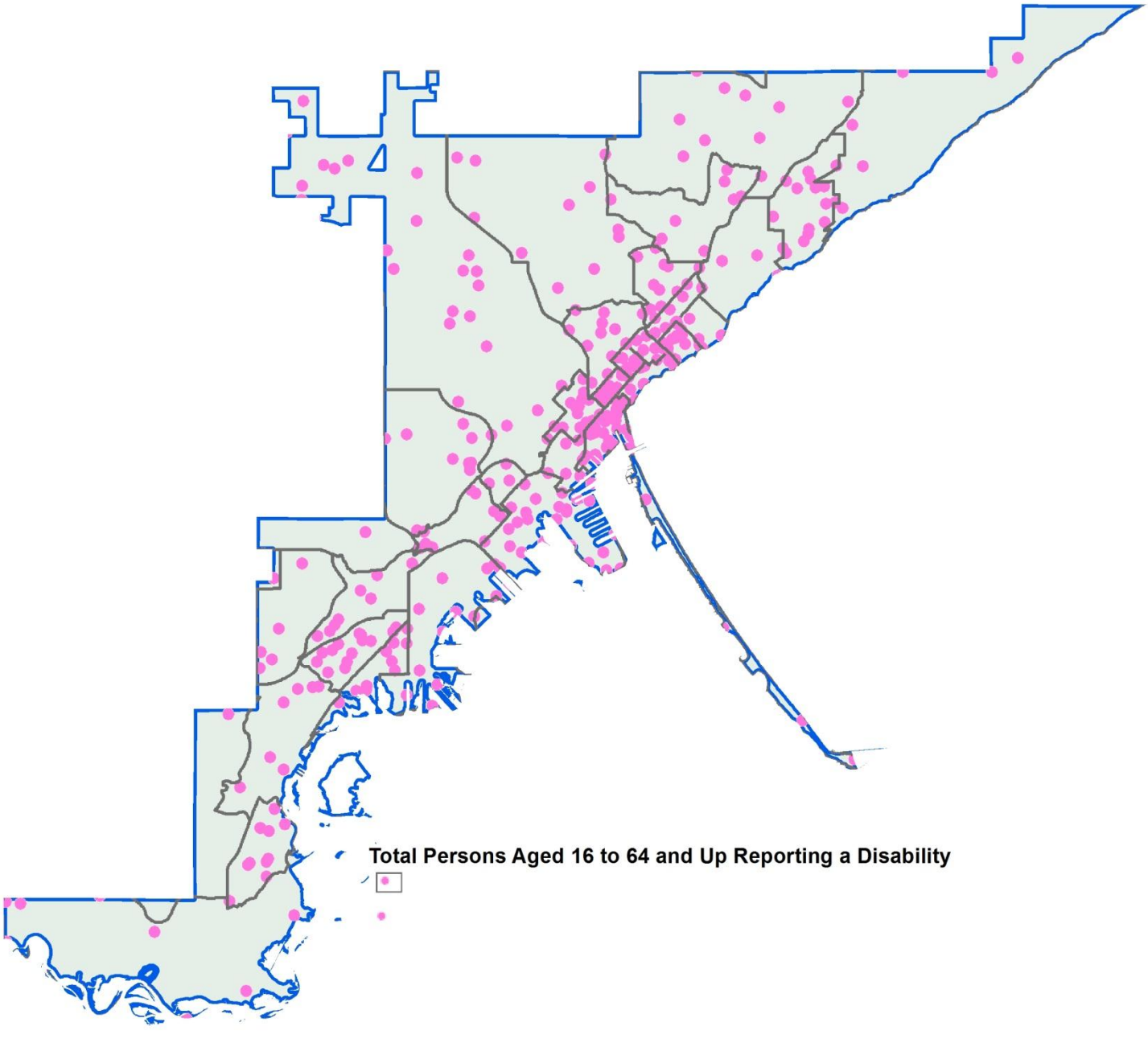
Source: US Census Bureau American Community Survey 2008 to 2012, Decennial Census 2010 and Decennial Census 2000

Disability Status Maps: Total Disabled Ages 5 and Up



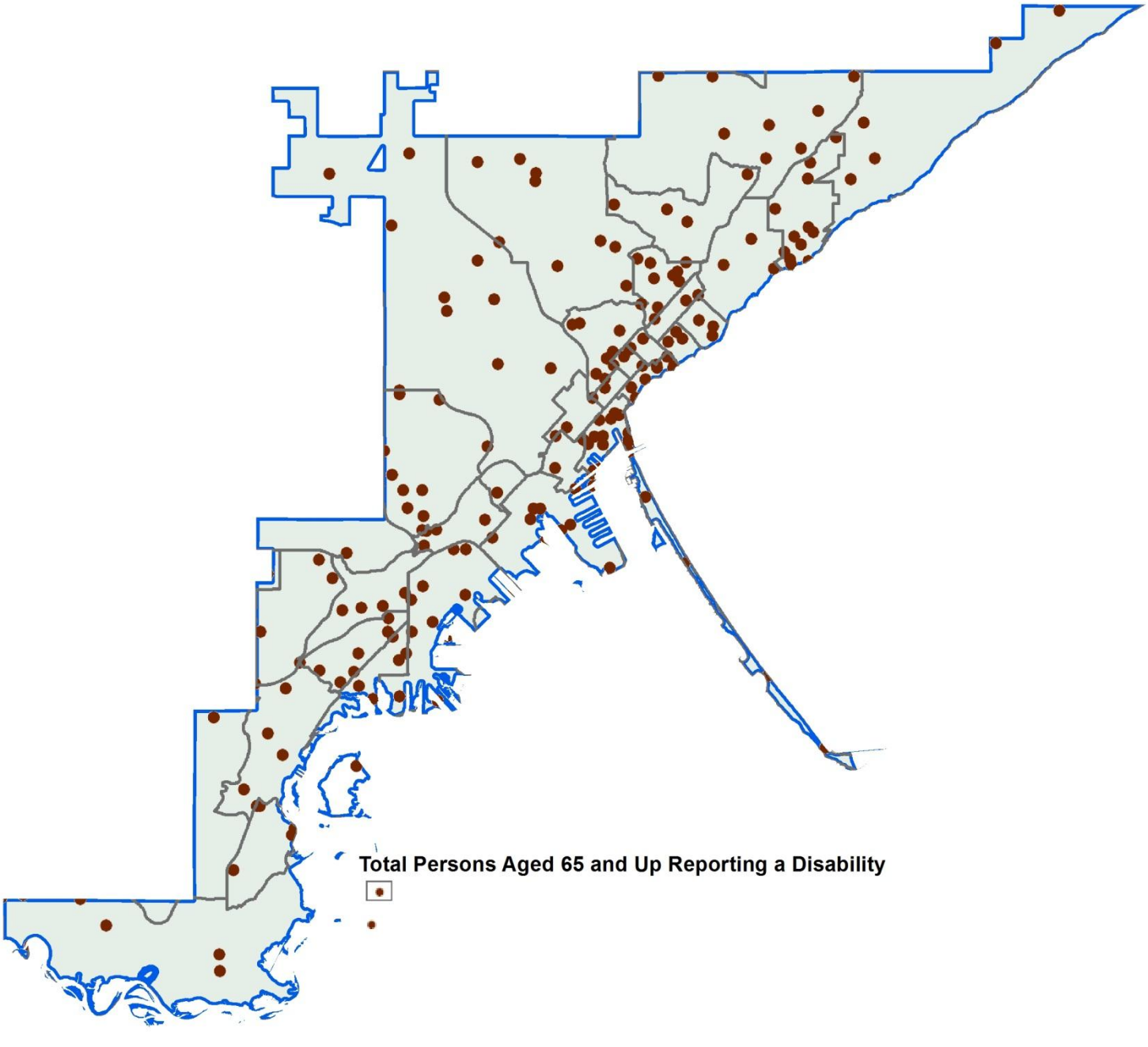
Source: http://egis.hud.gov/arcgis/services
Name: affht/Disability

Disability Status Maps: Total Disabled Ages 16 to 64



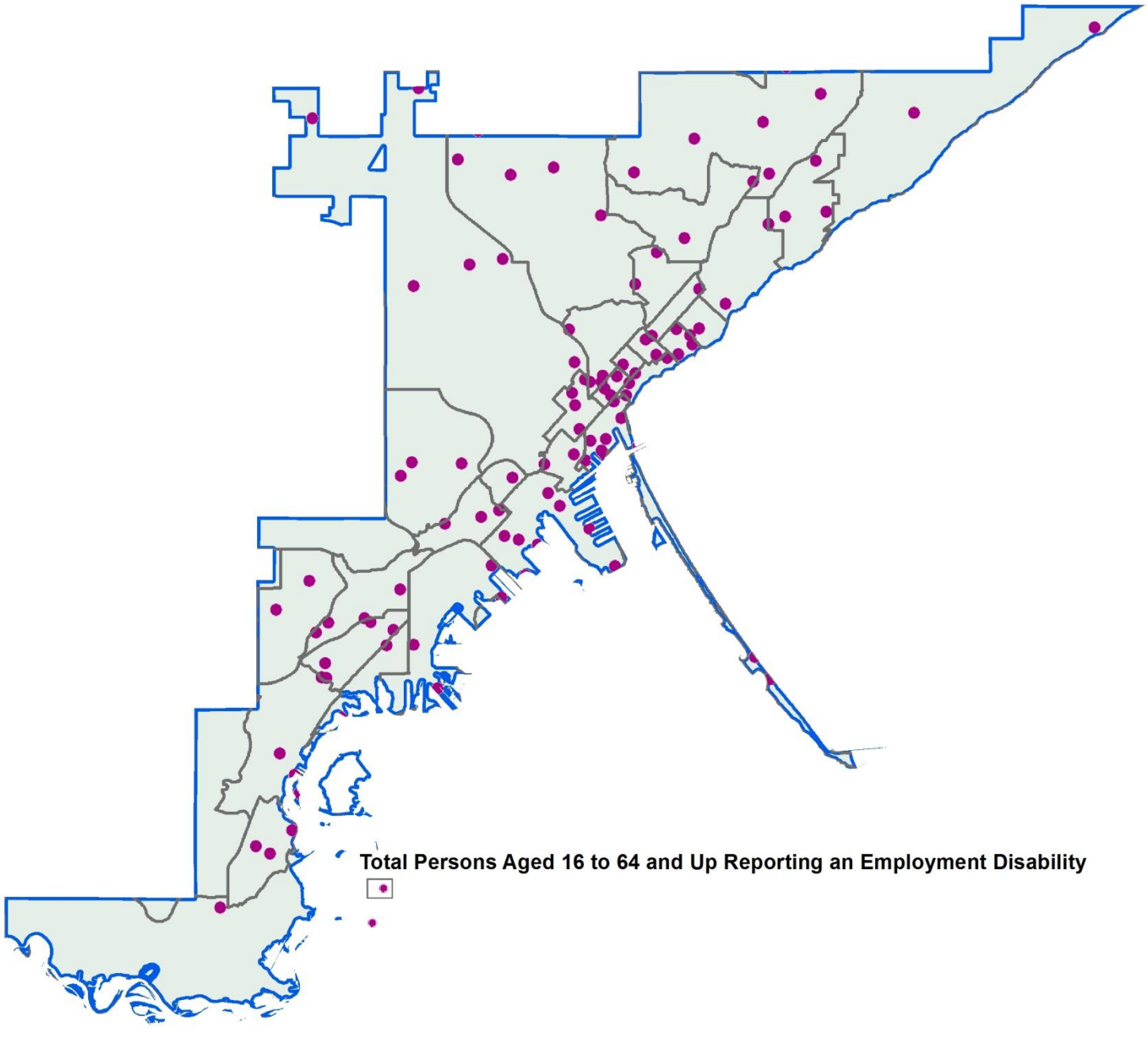
Source: http://egis.hud.gov/arcgis/services
Name: affht/Disability

Disability Status Maps: Total Disabled Ages 65 and Up



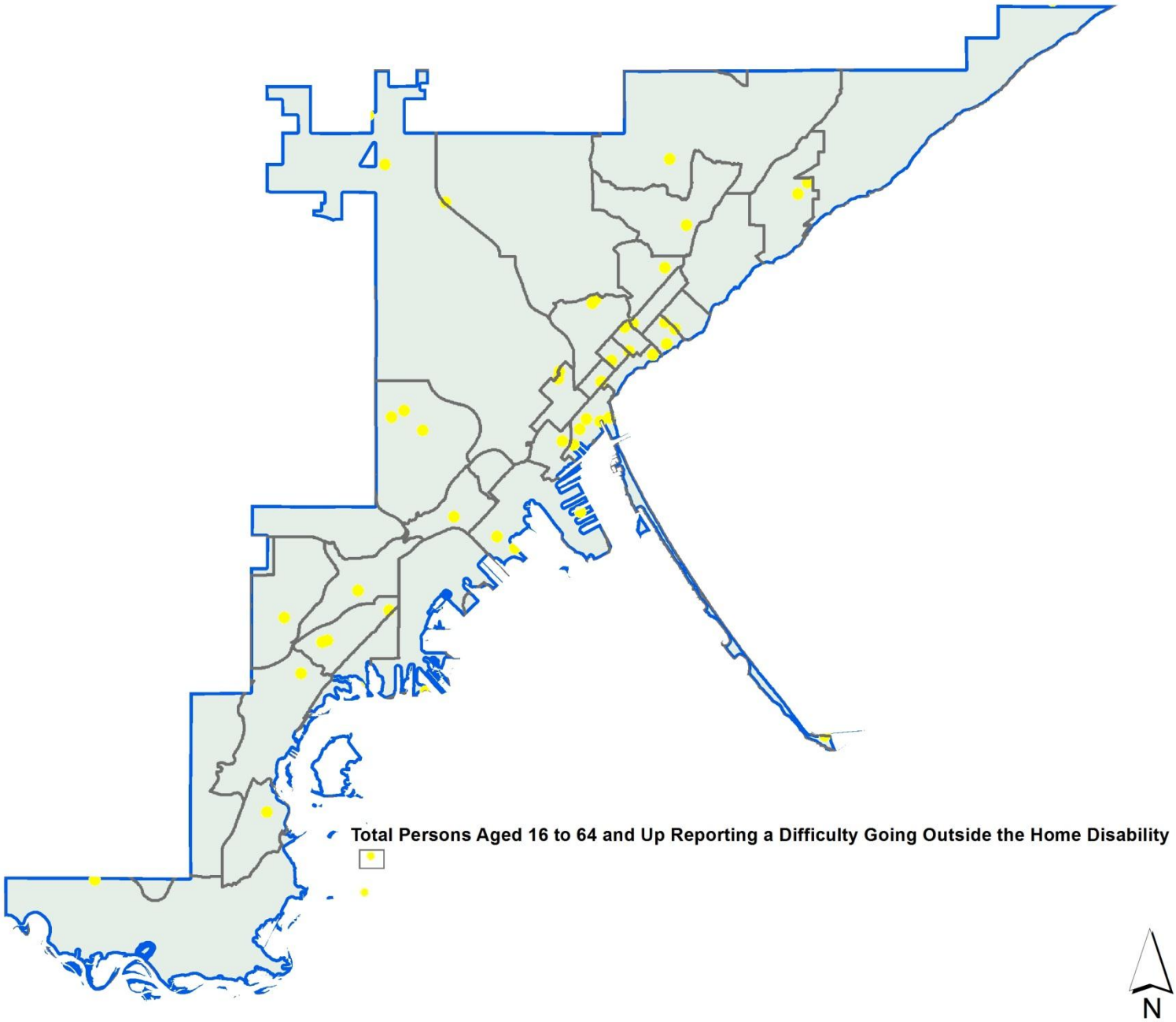
Source: http://egis.hud.gov/arcgis/services
Name: affht/Disability

Disability Status Maps: Employment Disability



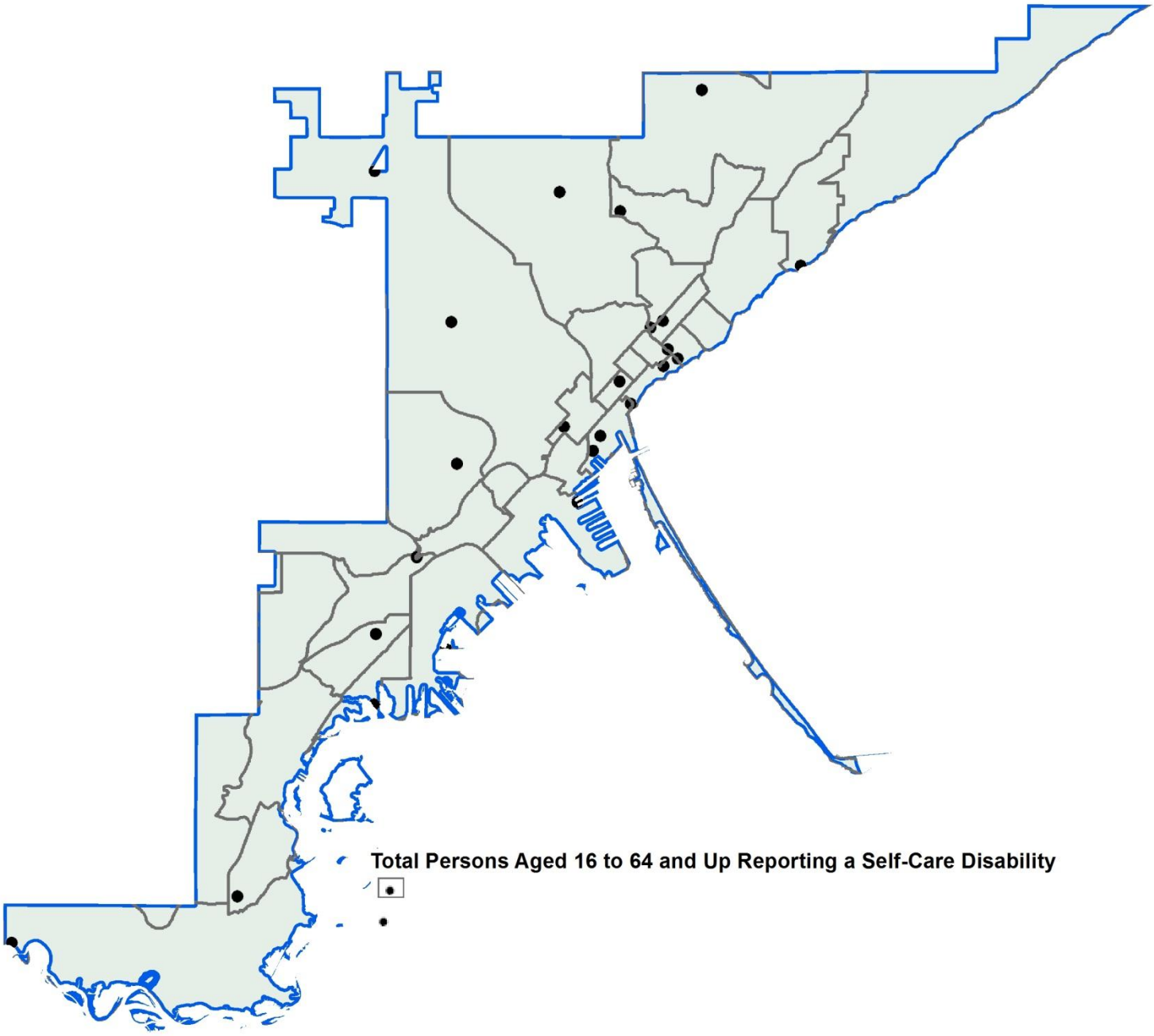
Source: http://egis.hud.gov/arcgis/services
Name: affht/Disability

Disability Status Maps: Difficulty Going Outside the Home



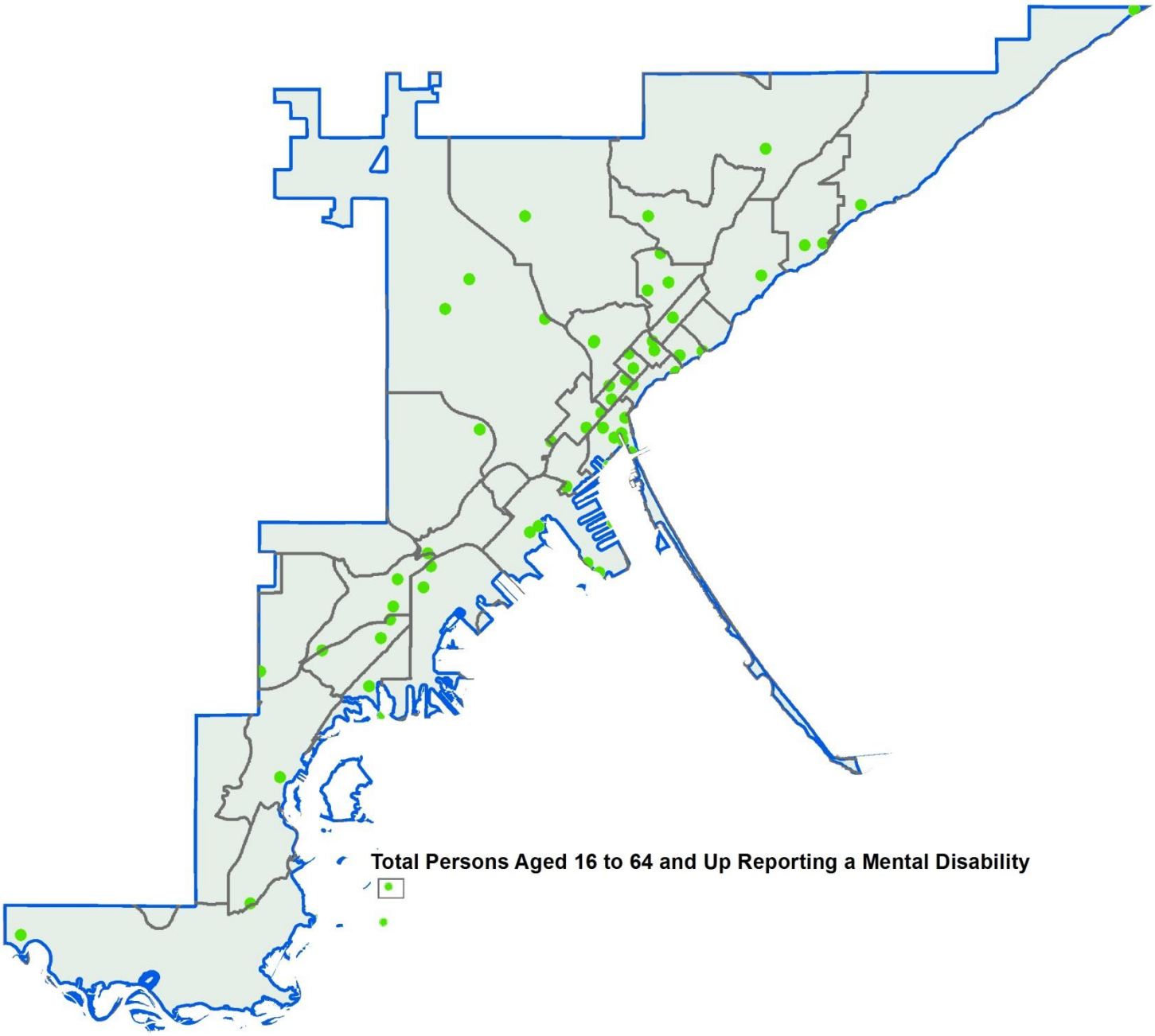
Source: http://egis.hud.gov/arcgis/services
Name: affht/Disability

Disability Status Maps: Self-Care Disability



Source: http://egis.hud.gov/arcgis/services
Name: affht/Disability

Disability Status Maps: Mental Disability

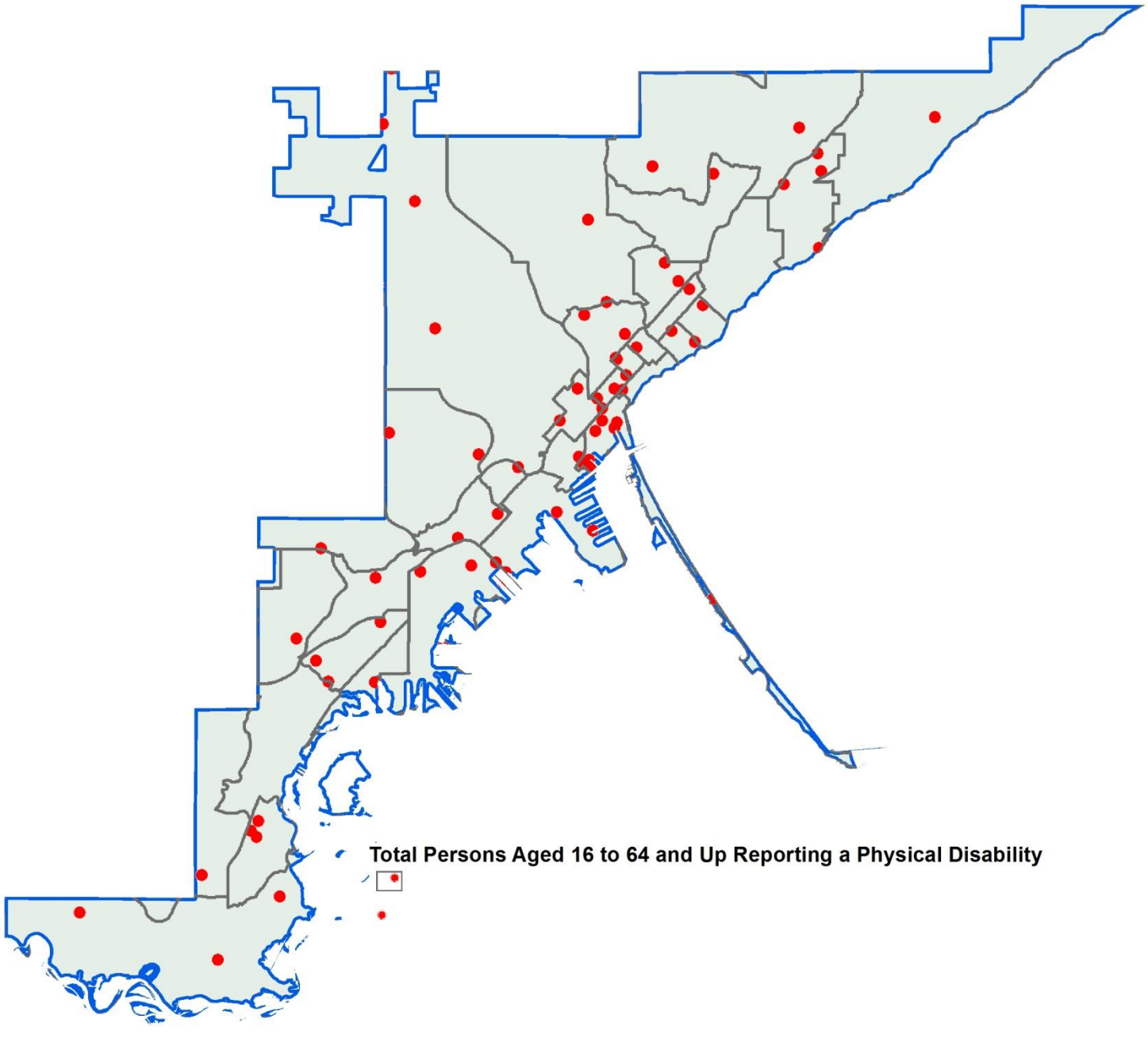


N

Source: http://egis.hud.gov/arcgis/services
Name: affht/Disability

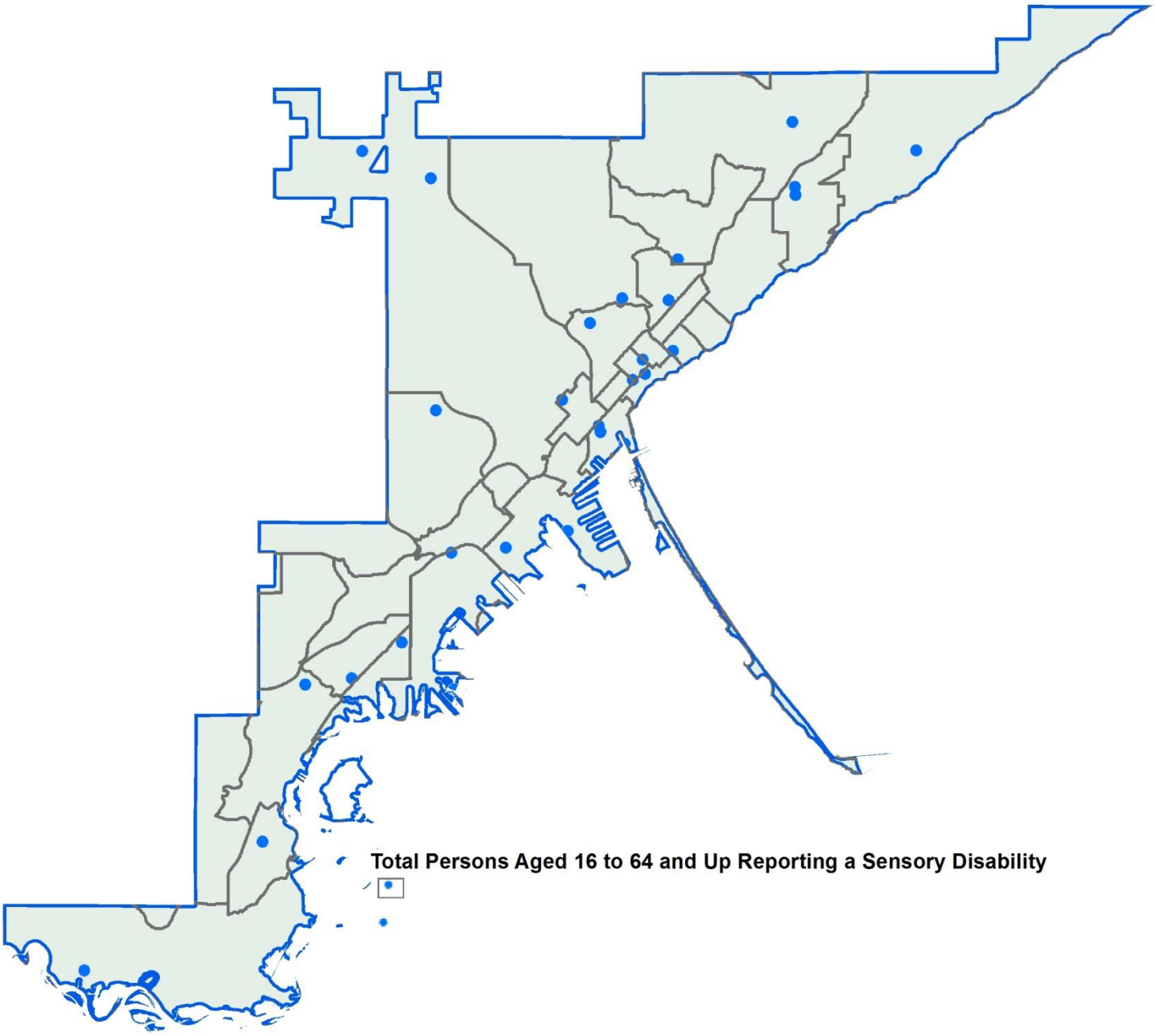
0 0.5 1 2 3 4 Miles

Disability Status Maps: Physical Disability



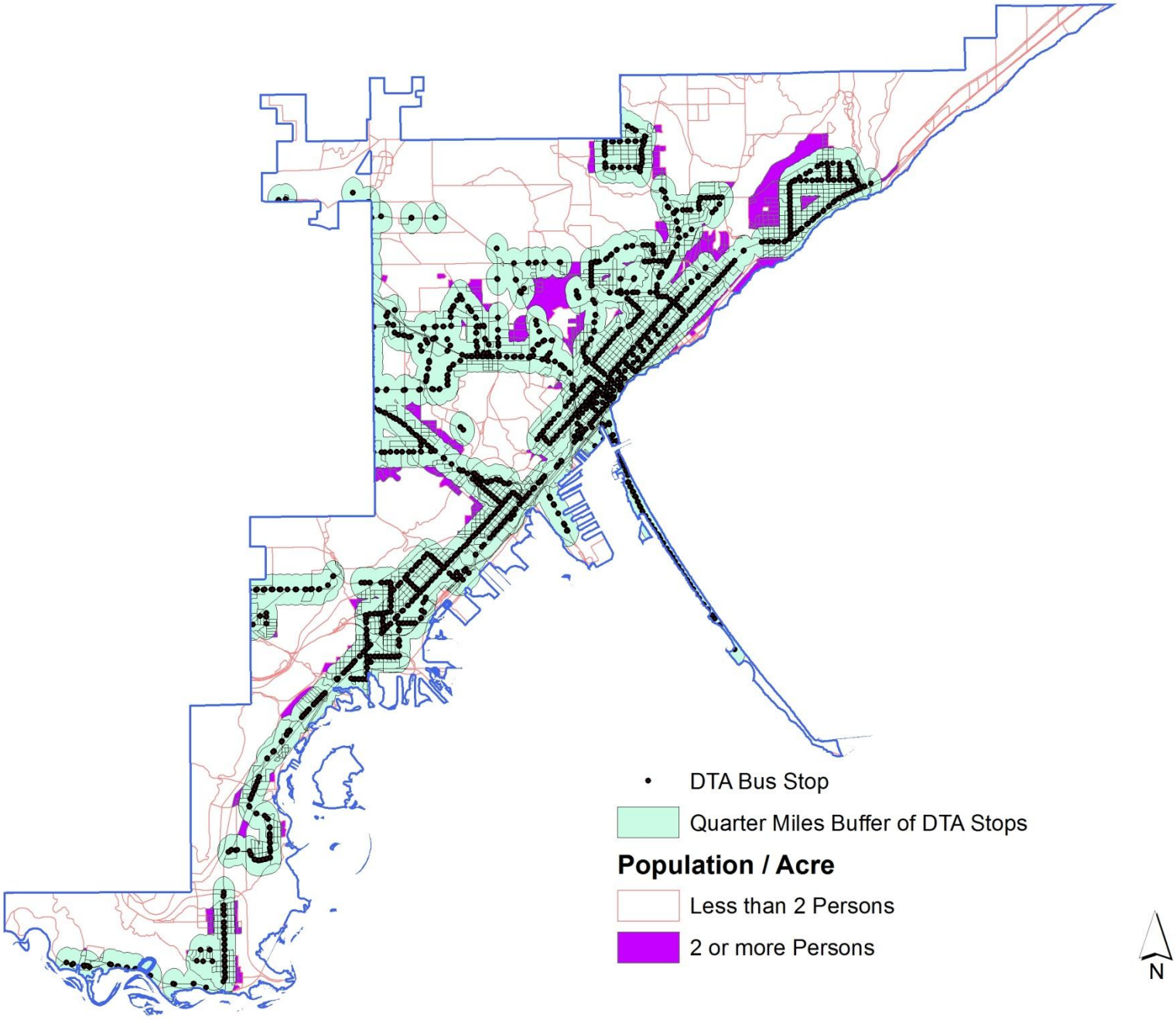
Source: http://egis.hud.gov/arcgis/services
Name: affht/Disability

Disability Status Maps: Sensory Disability



Source: http://egis.hud.gov/arcgis/services
Name: affht/Disability

Population Near Bus Stop



Source: Arrowhead Regional Development Authority and City of Duluth

Housing Mortgage Disclosure Act

AGGREGATE TABLE 4-2: DISPOSITION OF APPLICATIONS FOR

MSA/MD: 20260 - DULUTH, MN-WI	2008 Applications	2008 Originated	2008 Denied	2008 Denial Rate	2009 Applications	2009 Originated	2009 Denied	2009 Denial Rate	2010 Applications	2010 Originated	2010 Denied	2010 Denial Rate	2011 Applications	2011 Originated	2011 Denied	2011 Denial Rate
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	30	19	6	20.00%	23	14	9	39.13%	19	11	7	36.84%	9	6	2	22.22%
MALE	8	3	2	25.00%	11	6	5	45.45%	9	6	2	22.22%	4	3	1	25.00%
FEMALE	16	12	4	25.00%	11	8	3	27.27%	7	4	3	42.86%	5	3	1	20.00%
JOINT (MALE/FEMALE)	6	4	0	0.00%	1	0	1	100.00%	3	1	2	66.67%	0	0	0	0.00%
ASIAN (TOTAL)	20	13	1	5.00%	12	7	1	8.33%	5	3	1	20.00%	9	9	0	0.00%
MALE	10	7	0	0.00%	8	5	1	12.50%	1		1	100.00%	6	6	0	0.00%
FEMALE	7	4	0	0.00%	2	1	0	0.00%	2	1	0	0.00%	0	0	0	0.00%
JOINT (MALE/FEMALE)	3	2	1	33.33%	2	1	0	0.00%	2	2	0	0.00%	3	3	0	0.00%
BLACK OR AFRICAN AMERICAN (TOTAL)	9	5	2	22.22%	4	2	2	50.00%	2	1	0	0.00%	4	1	3	75.00%
MALE	6	3	2	33.33%	2	1	1	50.00%	1		0	0.00%	3	1	2	66.67%
FEMALE	2	1	0	0.00%	2	1	1	50.00%	1	1	0	0.00%	1		1	100.00%
JOINT (MALE/FEMALE)	1	1	0	0.00%	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	0	0	0	0.00%	3	1	2	66.67%	0	0	0	0.00%	1	1	0	0.00%
MALE	0	0	0	0.00%	1		1	100.00%	0	0	0	0.00%	0	0	0	0.00%
FEMALE	0	0	0	0.00%	1		1	100.00%	0	0	0	0.00%	0	0	0	0.00%
JOINT (MALE/FEMALE)	0	0	0	0.00%	1	1	0	0.00%	0	0	0	0.00%	1	1	0	0.00%
WHITE (TOTAL)	2410	1781	289	11.99%	1780	1319	228	12.81%	1592	1201	190	11.93%	1701	1336	174	10.23%
MALE	796	552	123	15.45%	549	396	83	15.12%	507	360	65	12.82%	543	410	70	12.89%
FEMALE	485	365	58	11.96%	363	270	46	12.67%	332	247	47	14.16%	339	268	39	11.50%
JOINT (MALE/FEMALE)	1126	864	107	9.50%	865	650	99	11.45%	749	592	76	10.15%	815	656	63	7.73%
2 OR MORE MINORITY RACES (TOTAL)	0	0	0	0.00%	2	1	0	0.00%	0	0	0	0.00%	0	0	0	0.00%
MALE	0	0	0	0.00%	1	1	0	0.00%	0	0	0	0.00%	0	0	0	0.00%
FEMALE	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%
JOINT (MALE/FEMALE)	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%	0	0	0	0.00%
JOINT (WHITE/MINORITY RACE) (TOTAL)	25	12	5	20.00%	24	15	5	20.83%	19	12	7	36.84%	24	14	5	20.83%
MALE	2	1	1	50.00%	0	0	0	0.00%	0	0	0	0.00%	1	1	0	0.00%
FEMALE	0	0	0	0.00%	1	1	0	0.00%	1	1	0	0.00%	0	0	0	0.00%
JOINT (MALE/FEMALE)	23	11	4	17.39%	23	14	5	21.74%	18	11	7	38.89%	23	13	5	21.74%
RACE NOT AVAILABLE (TOTAL) 6/	160	106	16	10.00%	128	93	22	17.19%	146	101	27	18.49%	121	80	28	23.14%
MALE	14	6	1	7.14%	4	3	1	25.00%	8	4	4	50.00%	9	5	3	33.33%
FEMALE	5	2	2	40.00%	7	4	1	14.29%	3	2	1	33.33%	2	1	1	50.00%
JOINT (MALE/FEMALE)	11	9	0	0.00%	15	14	1	6.67%	11	5	3	27.27%	7	4	3	42.86%
Total M-F-J	2521	1847	305	12.10%	1870	1377	250	13.37%	1655	1237	211	12.75%	1762	1375	189	10.73%
Total	2654	1936	319	12.02%	1976	1452	269	13.61%	1783	1329	232	13.01%	1869	1447	212	11.34%
MSA/MD: 20260 - DULUTH, MN-WI																
ETHNICITY, GENDER AND INCOME 7/18/19/																
HISPANIC OR LATINO (TOTAL)	18	9	3	17%	14	12	2	14%	12	6	6	50%	9	5	4	44%
MALE	8	5	2	25%	8	6	2	25%	8	3	5	63%	7	4	3	43%
FEMALE	5	3	0	0%	3	3	0	0%	2	2	0	0%	1		1	100%
JOINT (MALE/FEMALE)	5	1	1	20%	3	3	0	0%	2	1	1	50%	1	1	0	0%
NOT HISPANIC OR LATINO (TOTAL)	2462	1809	300	12%	1806	1327	241	13%	1594	1208	188	12%	1719	1348	178	10%
MALE	814	560	127	16%	561	400	90	16%	503	361	61	12%	547	415	71	13%
FEMALE	505	379	62	12%	372	274	51	14%	333	250	44	13%	342	269	40	12%
JOINT (MALE/FEMALE)	1137	868	110	10%	873	653	100	11%	753	594	81	11%	828	664	65	8%
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	12	9	0	0%	11	5	4	36%	8	5	2	25%	5	3	1	20%
MALE	1	1	0	0%	0	0	0	0%	0	0	0	0%	0	0	0	0%
FEMALE	0	0	0	0%	0	0	0	0%	0	0	0	0%	0	0	0	0%
JOINT (MALE/FEMALE)	11	8	0	0%	10	5	4	40%	8	5	2	25%	5	3	1	20%
ETHNICITY NOT AVAILABLE (TOTAL) 6/	162	109	16	10%	145	108	22	15%	169	110	36	21%	136	91	29	21%
MALE	13	6	0	0%	7	6	0	0%	15	6	6	40%	12	7	2	17%
FEMALE	5	2	2	40%	12	8	1	8%	11	4	7	64%	4	3	1	25%
JOINT (MALE/FEMALE)	17	14	1	6%	21	19	2	10%	20	11	4	20%	15	9	5	33%
MINORITY STATUS 8/18/19/																
WHITE NON-HISPANIC (TOTAL)	2367	1753	285	12%	1738	1287	221	13%	1549	1180	174	11%	1671	1316	168	10%
MALE	782	543	121	15%	538	388	81	15%	491	354	58	12%	531	404	67	13%
FEMALE	480	361	58	12%	355	263	46	13%	323	243	42	13%	336	266	38	11%
JOINT (MALE/FEMALE)	1103	849	105	10%	845	636	94	11%	732	582	72	10%	802	646	61	8%
OTHERS, INCLUDING HISPANIC (TOTAL)	113	67	17	15%	91	56	25	27%	63	36	23	37%	60	39	14	23%
MALE	35	20	7	20%	31	19	10	32%	19	9	8	42%	21	15	6	29%
FEMALE	29	20	4	14%	20	14	5	25%	13	9	3	23%	7	3	3	43%
JOINT (MALE/FEMALE)	49	27	6	12%	39	23	10	26%	31	18	12	39%	32	21	5	16%
INCOME OF APPLICANTS 9/																
LESS THAN 50% OF MSA/MD MEDIAN	310	194	65	21%	280	175	72	26%	232	141	59	25%	246	158	60	24%
50-79% OF MSA/MD MEDIAN	595	426	81	14%	436	305	76	17%	354	266	43	12%	399	309	55	14%
80-99% OF MSA/MD MEDIAN	296	215	35	12%	224	163	34	15%	218	154	28	13%	243	194	21	9%
100-119% OF MSA/MD MEDIAN	259	189	30	12%	193	141	22	11%	171	134	19	11%	174	127	24	14%
120% OR MORE OF MSA/MD MEDIAN	1117	848	105	9%	790	624	62	8%	748	588	77	10%	753	617	45	6%
INCOME NOT AVAILABLE 6/	77	64	3	4%	53	44	3	6%	60	46	6	10%	54	42	7	13%
TOTAL 14/	2654	1936	319	12%	1976	1452	269	14%	1783	1329	232	13%	1869	1447	212	11%

AGGREGATE TABLE 4-2: DISPOSITION OF APPLICATIONS FOR

MSA/MD: 20260 - DULUTH, MN-WI	2012 Applications	Originated	Denied	Denial Rate	5 Year Summary: 5 YearTotal Applications	5 Year Total Denial	Percent of Applicants	Percentage of Population	Precent of Denied	Difference of Apps Verse Denials	5 year rate	Mean	Median
AMERICAN INDIAN/ALASKA NATIVE (TOTAL)	21	15	3	14.29%	102	27	0.97%	2.50%	2.13%	1.16%	26.47%	26.50%	22.22%
MALE	10	6	2	20.00%	42	12	0.43%		1.03%	0.60%	28.57%	27.54%	25.00%
FEMALE	7	5	1	14.29%	46	12	0.47%		1.03%	0.56%	26.09%	25.88%	25.00%
JOINT (MALE/FEMALE)	4	4	0	0.00%	14	3	0.14%		0.26%	0.12%	21.43%	33.33%	0.00%
ASIAN (TOTAL)	12	9	1	8.33%	58	4	0.55%	1.50%	0.32%	-0.24%	6.90%	8.33%	8.33%
MALE	6	4	1	16.67%	31	3	0.31%		0.26%	-0.06%	9.68%	25.83%	12.50%
FEMALE	2	2	0	0.00%	13	0	0.13%		0.00%	-0.13%	0.00%	0.00%	0.00%
JOINT (MALE/FEMALE)	4	3	0	0.00%	14	1	0.14%		0.09%	-0.06%	7.14%	6.67%	0.00%
BLACK OR AFRICAN AMERICAN (TOTAL)	3	3	0	0.00%	22	7	0.21%	2.30%	0.55%	0.34%	31.82%	29.44%	22.22%
MALE	1	1	0	0.00%	13	5	0.13%		0.43%	0.30%	38.46%	30.00%	33.33%
FEMALE	2	2	0	0.00%	8	2	0.08%		0.17%	0.09%	25.00%	30.00%	0.00%
JOINT (MALE/FEMALE)	0	0	0	0.00%	1	0	0.01%		0.00%	-0.01%	0.00%	0.00%	0.00%
NATIVE HAWAIIAN/OTHER PACIFIC ISLND (TOTAL)	2	2	0	0.00%	6	2	0.06%	0.00%	0.16%	0.10%	33.33%	13.33%	0.00%
MALE	0	0	0	0.00%	1	1	0.01%		0.09%	0.08%	100.00%	20.00%	0.00%
FEMALE	2	2	0	0.00%	3	1	0.03%		0.09%	0.06%	33.33%	20.00%	0.00%
JOINT (MALE/FEMALE)	0	0	0	0.00%	2	0	0.02%		0.00%	-0.02%	0.00%	0.00%	0.00%
WHITE (TOTAL)	1996	1560	201	10.07%	9479	1082	90.28%	90.40%	85.40%	-4.89%	11.41%	11.41%	11.93%
MALE	624	462	78	12.50%	3019	419	30.55%		35.87%	5.32%	13.88%	13.76%	12.89%
FEMALE	355	283	32	9.01%	1874	222	18.96%		19.01%	0.04%	11.85%	11.86%	11.96%
JOINT (MALE/FEMALE)	1012	813	91	8.99%	4567	436	46.22%		37.33%	-8.89%	9.55%	9.56%	9.50%
2 OR MORE MINORITY RACES (TOTAL)	1	0	1	100.00%	3	1	0.03%	3.00%	0.08%	0.05%	33.33%	20.00%	0.00%
MALE	1		1	100.00%	2	1	0.02%		0.09%	0.07%	50.00%	20.00%	0.00%
FEMALE	0	0	0	0.00%	0	0	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%
JOINT (MALE/FEMALE)	0	0	0	0.00%	0	0	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%
JOINT (WHITE/MINORITY RACE) (TOTAL)	26	22	3	11.54%	118	25	1.12%		1.97%	0.85%	21.19%	22.01%	20.83%
MALE	2	2	0	0.00%	5	1	0.05%		0.09%	0.04%	20.00%	10.00%	0.00%
FEMALE	0	0	0	0.00%	2	0	0.02%		0.00%	-0.02%	0.00%	0.00%	0.00%
JOINT (MALE/FEMALE)	24	20	3	12.50%	111	24	1.12%		2.05%	0.93%	21.62%	22.45%	21.74%
RACE NOT AVAILABLE (TOTAL) 6/	156	117	26	16.67%	711	119	6.77%		9.39%	2.62%	16.74%	17.10%	17.19%
MALE	5	3	1	20.00%	40	10	0.40%		0.86%	0.45%	25.00%	27.10%	25.00%
FEMALE	1	1	0	0.00%	18	5	0.18%		0.43%	0.25%	27.78%	27.52%	33.33%
JOINT (MALE/FEMALE)	12	7	3	25.00%	56	10	0.57%		0.86%	0.29%	17.86%	20.36%	25.00%
Total M-F-J	2074	1620	213	10.27%	9882	1168					11.82%	11.84%	12.10%
Total	2217	1728	235	10.60%	10499	1267					12.07%	12.12%	12.02%
MSA/MD: 20260 - DULUTH, MN-WI													
ETHNICITY, GENDER AND INCOME 7/18/19/					0.00	0.00							
HISPANIC OR LATINO (TOTAL)	9	7	2	22%	62.00	17.00	0.59%		1.34%	0.75%	27%	30%	22%
MALE	6	5	1	17%	37.00	13.00	0.37%		1.11%	0.74%	35%	34%	25%
FEMALE	2	2	0	0%	13.00	1.00	0.13%		0.09%	-0.05%	8%	20%	0%
JOINT (MALE/FEMALE)	1		1	100%	12.00	3.00	0.12%		0.26%	0.14%	25%	34%	20%
NOT HISPANIC OR LATINO (TOTAL)	2015	1577	202	10%	9596.00	1109.00	91.40%		87.53%	-3.87%	12%	12%	12%
MALE	630	465	78	12%	3065.00	427.00	30.91%		36.56%	5.64%	14%	14%	13%
FEMALE	361	288	32	9%	1913.00	229.00	19.36%		19.61%	0.25%	12%	12%	12%
JOINT (MALE/FEMALE)	1021	823	92	9%	4612.00	448.00	46.67%		38.36%	-8.31%	10%	10%	10%
JOINT (HISPANIC OR LATINO/ NOT HISPANIC OR LATINO) (TOTAL)	15	13	1	7%	51.00	8.00	0.49%		0.63%	0.15%	16%	18%	20%
MALE	1	0	1	100%	2.00	1.00	0.02%		0.09%	0.07%	50%	20%	0%
FEMALE	0	0	0	0%	0.00	0.00	0.00%		0.00%	0.00%	0%	0%	
JOINT (MALE/FEMALE)	14	13	0	0%	48.00	7.00	0.49%		0.60%	0.11%	15%	17%	20%
ETHNICITY NOT AVAILABLE (TOTAL) 6/	178	131	30	17%	790.00	133.00	7.52%		10.50%	2.97%	17%	17%	17%
MALE	12	8	3	25%	59.00	11.00	0.60%		0.94%	0.34%	19%	16%	17%
FEMALE	6	5	1	17%	38.00	12.00	0.38%		1.03%	0.64%	32%	31%	25%
JOINT (MALE/FEMALE)	20	11	4	20%	93.00	16.00	0.94%		1.37%	0.43%	17%	18%	20%
MINORITY STATUS 8/18/19/							100.00%		100.00%				
WHITE NON-HISPANIC (TOTAL)	1953	1529	194	10%	9278.00	874.10	88.37%		68.99%	-19.38%	11%	11%	11%
MALE	609	451	74	12%	2951.00	334.13	29.86%		28.61%	-1.26%	14%	13%	13%
FEMALE	349	278	31	9%	1843.00	177.11	18.65%		15.16%	-3.49%	12%	12%	12%
JOINT (MALE/FEMALE)	992	799	89	9%	4474.00	360.08	45.27%		30.83%	-14.45%	9%	9%	10%
OTHERS, INCLUDING HISPANIC (TOTAL)	86	68	11	13%	413.00	76.23	3.93%		6.02%	2.08%	22%	23%	23%
MALE	27	18	6	22%	133.00	31.29	1.35%		2.68%	1.33%	28%	29%	29%
FEMALE	15	13	1	7%	84.00	13.43	0.85%		1.15%	0.30%	19%	22%	23%
JOINT (MALE/FEMALE)	44	37	4	9%	195.00	32.16	1.97%		2.75%	0.78%	19%	20%	16%
INCOME OF APPLICANTS 9/													
LESS THAN 50% OF MSA/MD MEDIAN	261	175	53	20%	1329	309	13%		24.39%		23%	23%	24%
50-79% OF MSA/MD MEDIAN	388	290	50	13%	2172	305	21%		24.07%		14%	14%	14%
80-99% OF MSA/MD MEDIAN	302	230	38	13%	1283	156	12%		12.31%		12%	12%	13%
100-119% OF MSA/MD MEDIAN	246	198	19	8%	1043	114	10%		9.00%		11%	11%	11%
120% OR MORE OF MSA/MD MEDIAN	936	762	71	8%	4344	360	41%		28.41%		8%	8%	8%
INCOME NOT AVAILABLE 6/	84	73	4	5%	328	23	3%		1.82%		7%	7%	6%
TOTAL 14/	2217	1728	235	11%	10499	1267					12%	12%	12%

Source: http://www.ffiec.gov/hmda/

Census Tables

DP02

SELECTED SOCIAL CHARACTERISTICS IN THE UNITED STATES

2008-2012 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Subject	Minnesota				Duluth city, Minnesota
	Estimate	Margin of Error	Percent	Percent Margin of Error	Estimate
HOUSEHOLDS BY TYPE					
Total households	2,101,875	+/-4,843	2,101,875	(X)	35,862
Family households (families)	1,365,845	+/-5,379	65.0%	+/-0.2	19,260
With own children under 18 years	631,808	+/-4,426	30.1%	+/-0.2	8,569
Married-couple family	1,082,127	+/-5,922	51.5%	+/-0.2	13,926
With own children under 18 years	454,421	+/-4,747	21.6%	+/-0.2	4,914
Male householder, no wife present, family	86,507	+/-1,795	4.1%	+/-0.1	1,225
With own children under 18 years	48,680	+/-1,412	2.3%	+/-0.1	711
Female householder, no husband present, family	197,211	+/-2,087	9.4%	+/-0.1	4,109
With own children under 18 years	128,707	+/-1,820	6.1%	+/-0.1	2,944
Nonfamily households	736,030	+/-3,723	35.0%	+/-0.2	16,602
Householder living alone	592,835	+/-3,628	28.2%	+/-0.2	12,297
65 years and over	204,283	+/-2,656	9.7%	+/-0.1	4,274
Households with one or more people under 18 years	670,480	+/-4,535	31.9%	+/-0.2	9,040
Households with one or more people 65 years and over	477,574	+/-1,796	22.7%	+/-0.1	8,304
Average household size	2.46	+/-0.01	(X)	(X)	2.22
Average family size	3.03	+/-0.01	(X)	(X)	2.83
RELATIONSHIP					
Population in households	5,177,138	*****	5,177,138	(X)	79,492
Householder	2,101,875	+/-4,843	40.6%	+/-0.1	35,862
Spouse	1,081,428	+/-6,757	20.9%	+/-0.1	13,979
Child	1,518,042	+/-4,915	29.3%	+/-0.1	19,367
Other relatives	178,675	+/-4,624	3.5%	+/-0.1	1,904
Nonrelatives	297,118	+/-5,674	5.7%	+/-0.1	8,380
Unmarried partner	136,647	+/-2,151	2.6%	+/-0.1	2,720
MARITAL STATUS					
Males 15 years and over	2,096,023	+/-773	2,096,023	(X)	35,729
Never married	716,441	+/-4,620	34.2%	+/-0.2	16,665
Now married, except separated	1,133,637	+/-6,446	54.1%	+/-0.3	14,622
Separated	20,167	+/-986	1.0%	+/-0.1	366

Subject	Minnesota				Duluth city, Minnesota
	Estimate	Margin of Error	Percent	Percent Margin of Error	Estimate
Widowed	44,169	+/-918	2.1%	+/-0.1	755
Divorced	181,609	+/-2,921	8.7%	+/-0.1	3,321
Females 15 years and over	2,156,606	+/-665	2,156,606	(X)	37,342
Never married	599,607	+/-4,318	27.8%	+/-0.2	14,373
Now married, except separated	1,121,498	+/-5,281	52.0%	+/-0.2	14,439
Separated	26,238	+/-1,140	1.2%	+/-0.1	395
Widowed	179,765	+/-1,968	8.3%	+/-0.1	3,706
Divorced	229,498	+/-3,157	10.6%	+/-0.1	4,429
FERTILITY					
Number of women 15 to 50 years old who had a birth in the past 12 months	76,531	+/-1,964	76,531	(X)	1,142
Unmarried women (widowed, divorced, and never married)	22,216	+/-1,049	29.0%	+/-1.1	461
Per 1,000 unmarried women	34	+/-2	(X)	(X)	30
Per 1,000 women 15 to 50 years old	59	+/-2	(X)	(X)	50
Per 1,000 women 15 to 19 years old	19	+/-2	(X)	(X)	22
Per 1,000 women 20 to 34 years old	110	+/-3	(X)	(X)	86
Per 1,000 women 35 to 50 years old	25	+/-1	(X)	(X)	11
GRANDPARENTS					
Number of grandparents living with own grandchildren under 18 years	60,468	+/-1,704	60,468	(X)	670
Responsible for grandchildren	22,894	+/-1,053	37.9%	+/-1.4	314
Years responsible for grandchildren					
Less than 1 year	6,580	+/-642	10.9%	+/-1.0	71
1 or 2 years	5,538	+/-465	9.2%	+/-0.8	39
3 or 4 years	3,454	+/-392	5.7%	+/-0.6	110
5 or more years	7,322	+/-641	12.1%	+/-1.0	94
Number of grandparents responsible for own grandchildren under 18 years	22,894	+/-1,053	22,894	(X)	314
Who are female	13,790	+/-634	60.2%	+/-1.3	200
Who are married	16,250	+/-977	71.0%	+/-1.9	214
SCHOOL ENROLLMENT					
Population 3 years and over enrolled in school	1,412,738	+/-3,756	1,412,738	(X)	27,352
Nursery school, preschool	95,764	+/-1,959	6.8%	+/-0.1	1,228
Kindergarten	69,758	+/-1,398	4.9%	+/-0.1	1,001
Elementary school (grades 1-8)	558,085	+/-2,076	39.5%	+/-0.2	6,142
High school (grades 9-12)	297,803	+/-1,979	21.1%	+/-0.1	4,092
College or graduate school	391,328	+/-3,673	27.7%	+/-0.2	14,889
EDUCATIONAL ATTAINMENT					
Population 25 years and over	3,525,850	+/-842	3,525,850	(X)	52,655
Less than 9th grade	116,650	+/-2,134	3.3%	+/-0.1	1,029
9th to 12th grade, no diploma	169,189	+/-2,417	4.8%	+/-0.1	2,538
High school graduate (includes equivalency)	955,846	+/-5,650	27.1%	+/-0.2	14,004
Some college, no degree	794,194	+/-5,117	22.5%	+/-0.1	13,397
Associate's degree	353,432	+/-3,421	10.0%	+/-0.1	4,829
Bachelor's degree	768,061	+/-5,725	21.8%	+/-0.2	11,024
Graduate or professional degree	368,478	+/-4,076	10.5%	+/-0.1	5,834
Percent high school graduate or higher	(X)	(X)	91.9%	+/-0.1	(X)
Percent bachelor's degree or higher	(X)	(X)	32.2%	+/-0.2	(X)
VETERAN STATUS					
Civilian population 18 years and over	4,029,928	+/-497	4,029,928	(X)	70,011
Civilian veterans	377,522	+/-2,883	9.4%	+/-0.1	6,494

Subject	Minnesota				Duluth city, Minnesota
	Estimate	Margin of Error	Percent	Percent Margin of Error	Estimate
DISABILITY STATUS OF THE CIVILIAN NONINSTITUTIONALIZED POPULATION					
Total Civilian Noninstitutionalized Population	5,253,764	+/-309	5,253,764	(X)	84,537
With a disability	524,148	+/-4,070	10.0%	+/-0.1	10,308
Under 18 years	1,278,246	+/-393	1,278,246	(X)	15,894
With a disability	47,131	+/-1,400	3.7%	+/-0.1	707
18 to 64 years	3,316,728	+/-779	3,316,728	(X)	57,533
With a disability	265,732	+/-2,900	8.0%	+/-0.1	5,659
65 years and over	658,790	+/-493	658,790	(X)	11,110
With a disability	211,285	+/-1,896	32.1%	+/-0.3	3,942
RESIDENCE 1 YEAR AGO					
Population 1 year and over	5,246,422	+/-1,539	5,246,422	(X)	85,278
Same house	4,487,764	+/-9,880	85.5%	+/-0.2	64,598
Different house in the U.S.	733,095	+/-9,591	14.0%	+/-0.2	20,148
Same county	407,526	+/-6,651	7.8%	+/-0.1	13,197
Different county	325,569	+/-5,057	6.2%	+/-0.1	6,951
Same state	228,021	+/-4,406	4.3%	+/-0.1	5,369
Different state	97,548	+/-3,310	1.9%	+/-0.1	1,582
Abroad	25,563	+/-1,545	0.5%	+/-0.1	532
PLACE OF BIRTH					
Total population	5,313,081	*****	5,313,081	(X)	86,239
Native	4,930,349	+/-4,387	92.8%	+/-0.1	83,675
Born in United States	4,898,731	+/-4,458	92.2%	+/-0.1	83,228
State of residence	3,645,218	+/-7,248	68.6%	+/-0.1	64,102
Different state	1,253,513	+/-7,231	23.6%	+/-0.1	19,126
Born in Puerto Rico, U.S. Island areas, or born abroad to American parent(s)	31,618	+/-1,092	0.6%	+/-0.1	447
Foreign born	382,732	+/-4,389	7.2%	+/-0.1	2,564
U.S. CITIZENSHIP STATUS					
Foreign-born population	382,732	+/-4,389	382,732	(X)	2,564
Naturalized U.S. citizen	171,129	+/-2,984	44.7%	+/-0.7	1,368
Not a U.S. citizen	211,603	+/-3,981	55.3%	+/-0.7	1,196
YEAR OF ENTRY					
Population born outside the United States	414,350	+/-4,459	414,350	(X)	3,011
Native	31,618	+/-1,092	31,618	(X)	447
Entered 2010 or later	696	+/-163	2.2%	+/-0.5	0
Entered before 2010	30,922	+/-1,069	97.8%	+/-0.5	447
Foreign born	382,732	+/-4,389	382,732	(X)	2,564
Entered 2010 or later	15,112	+/-1,027	3.9%	+/-0.3	196
Entered before 2010	367,620	+/-4,229	96.1%	+/-0.3	2,368
WORLD REGION OF BIRTH OF FOREIGN BORN					
Foreign-born population, excluding population born at sea	382,732	+/-4,389	382,732	(X)	2,564
Europe	45,165	+/-1,668	11.8%	+/-0.4	627
Asia	143,719	+/-1,813	37.6%	+/-0.5	933
Africa	73,241	+/-2,418	19.1%	+/-0.5	301
Oceania	2,112	+/-420	0.6%	+/-0.1	18
Latin America	106,040	+/-2,331	27.7%	+/-0.6	357
Northern America	12,455	+/-668	3.3%	+/-0.2	328

Subject	Minnesota				Duluth city, Minnesota
	Estimate	Margin of Error	Percent	Percent Margin of Error	Estimate
LANGUAGE SPOKEN AT HOME					
Population 5 years and over	4,960,626	+/-414	4,960,626	(X)	81,413
English only	4,432,890	+/-5,382	89.4%	+/-0.1	77,392
Language other than English	527,736	+/-5,400	10.6%	+/-0.1	4,021
Speak English less than "very well"	212,145	+/-3,551	4.3%	+/-0.1	1,236
Spanish	190,520	+/-2,468	3.8%	+/-0.1	1,261
Speak English less than "very well"	85,490	+/-2,000	1.7%	+/-0.1	421
Other Indo-European languages	107,890	+/-2,980	2.2%	+/-0.1	1,491
Speak English less than "very well"	26,265	+/-1,361	0.5%	+/-0.1	301
Asian and Pacific Islander languages	147,038	+/-2,554	3.0%	+/-0.1	825
Speak English less than "very well"	69,357	+/-2,082	1.4%	+/-0.1	408
Other languages	82,288	+/-3,129	1.7%	+/-0.1	444
Speak English less than "very well"	31,033	+/-1,620	0.6%	+/-0.1	106
ANCESTRY					
Total population	5,313,081	*****	5,313,081	(X)	86,239
American	172,529	+/-4,042	3.2%	+/-0.1	2,353
Arab	19,022	+/-1,572	0.4%	+/-0.1	186
Czech	94,234	+/-2,394	1.8%	+/-0.1	987
Danish	78,894	+/-1,734	1.5%	+/-0.1	706
Dutch	103,551	+/-2,255	1.9%	+/-0.1	1,245
English	318,471	+/-4,279	6.0%	+/-0.1	6,181
French (except Basque)	200,291	+/-3,172	3.8%	+/-0.1	3,950
French Canadian	51,987	+/-1,825	1.0%	+/-0.1	1,614
German	1,917,152	+/-8,416	36.1%	+/-0.2	21,452
Greek	12,873	+/-958	0.2%	+/-0.1	521
Hungarian	13,742	+/-872	0.3%	+/-0.1	240
Irish	591,707	+/-6,301	11.1%	+/-0.1	10,239
Italian	126,345	+/-2,828	2.4%	+/-0.1	4,600
Lithuanian	6,377	+/-669	0.1%	+/-0.1	354
Norwegian	852,159	+/-6,644	16.0%	+/-0.1	13,756
Polish	253,438	+/-3,111	4.8%	+/-0.1	5,936
Portuguese	3,521	+/-504	0.1%	+/-0.1	152
Russian	44,388	+/-1,617	0.8%	+/-0.1	611
Scotch-Irish	29,330	+/-1,038	0.6%	+/-0.1	710
Scottish	67,820	+/-1,784	1.3%	+/-0.1	1,652
Slovak	7,104	+/-571	0.1%	+/-0.1	176
Subsaharan African	104,492	+/-3,065	2.0%	+/-0.1	515
Swedish	478,603	+/-6,073	9.0%	+/-0.1	12,207
Swiss	23,299	+/-1,004	0.4%	+/-0.1	260
Ukrainian	15,372	+/-1,051	0.3%	+/-0.1	259
Welsh	22,465	+/-1,085	0.4%	+/-0.1	362
West Indian (excluding Hispanic origin groups)	5,491	+/-719	0.1%	+/-0.1	33

Subject	Duluth city, Minnesota		
	Margin of Error	Percent	Percent Margin of Error
HOUSEHOLDS BY TYPE			
Total households	+/-682	35,862	(X)
Family households (families)	+/-470	53.7%	+/-1.4
With own children under 18 years	+/-381	23.9%	+/-1.1
Married-couple family	+/-426	38.8%	+/-1.3
With own children under 18 years	+/-293	13.7%	+/-0.8
Male householder, no wife present, family	+/-216	3.4%	+/-0.6
With own children under 18 years	+/-158	2.0%	+/-0.4
Female householder, no husband present, family	+/-354	11.5%	+/-1.0
With own children under 18 years	+/-286	8.2%	+/-0.8
Nonfamily households	+/-707	46.3%	+/-1.4
Householder living alone	+/-642	34.3%	+/-1.4
65 years and over	+/-292	11.9%	+/-0.8
Households with one or more people under 18 years	+/-377	25.2%	+/-1.1
Households with one or more people 65 years and over	+/-305	23.2%	+/-0.8
Average household size	+/-0.04	(X)	(X)
Average family size	+/-0.05	(X)	(X)
RELATIONSHIP			
Population in households	+/-664	79,492	(X)
Householder	+/-682	45.1%	+/-0.7
Spouse	+/-432	17.6%	+/-0.5
Child	+/-632	24.4%	+/-0.8
Other relatives	+/-318	2.4%	+/-0.4
Nonrelatives	+/-602	10.5%	+/-0.7
Unmarried partner	+/-278	3.4%	+/-0.3
MARITAL STATUS			
Males 15 years and over	+/-569	35,729	(X)
Never married	+/-648	46.6%	+/-1.4
Now married, except separated	+/-411	40.9%	+/-1.2
Separated	+/-100	1.0%	+/-0.3
Widowed	+/-153	2.1%	+/-0.4
Divorced	+/-350	9.3%	+/-1.0
Females 15 years and over	+/-448	37,342	(X)
Never married	+/-509	38.5%	+/-1.2
Now married, except separated	+/-462	38.7%	+/-1.3
Separated	+/-110	1.1%	+/-0.3
Widowed	+/-248	9.9%	+/-0.6
Divorced	+/-313	11.9%	+/-0.8
FERTILITY			
Number of women 15 to 50 years old who had a birth in the past 12 months	+/-211	1,142	(X)
Unmarried women (widowed, divorced, and never married)	+/-145	40.4%	+/-9.0
Per 1,000 unmarried women	+/-10	(X)	(X)
Per 1,000 women 15 to 50 years old	+/-9	(X)	(X)
Per 1,000 women 15 to 19 years old	+/-17	(X)	(X)
Per 1,000 women 20 to 34 years old	+/-17	(X)	(X)
Per 1,000 women 35 to 50 years old	+/-5	(X)	(X)
GRANDPARENTS			
Number of grandparents living with own grandchildren under 18 years	+/-180	670	(X)
Responsible for grandchildren	+/-119	46.9%	+/-11.7

Subject	Duluth city, Minnesota		
	Margin of Error	Percent	Percent Margin of Error
Years responsible for grandchildren			
Less than 1 year	+/-50	10.6%	+/-6.8
1 or 2 years	+/-30	5.8%	+/-4.1
3 or 4 years	+/-74	16.4%	+/-9.4
5 or more years	+/-58	14.0%	+/-8.2
Number of grandparents responsible for own grandchildren under 18 years	+/-119	314	(X)
Who are female	+/-72	63.7%	+/-11.9
Who are married	+/-110	68.2%	+/-15.6
SCHOOL ENROLLMENT			
Population 3 years and over enrolled in school	+/-848	27,352	(X)
Nursery school, preschool	+/-193	4.5%	+/-0.7
Kindergarten	+/-168	3.7%	+/-0.6
Elementary school (grades 1-8)	+/-349	22.5%	+/-1.2
High school (grades 9-12)	+/-323	15.0%	+/-1.2
College or graduate school	+/-745	54.4%	+/-1.7
EDUCATIONAL ATTAINMENT			
Population 25 years and over	+/-648	52,655	(X)
Less than 9th grade	+/-229	2.0%	+/-0.4
9th to 12th grade, no diploma	+/-311	4.8%	+/-0.6
High school graduate (includes equivalency)	+/-579	26.6%	+/-1.1
Some college, no degree	+/-592	25.4%	+/-1.1
Associate's degree	+/-387	9.2%	+/-0.7
Bachelor's degree	+/-482	20.9%	+/-0.9
Graduate or professional degree	+/-463	11.1%	+/-0.9
Percent high school graduate or higher	(X)	93.2%	+/-0.7
Percent bachelor's degree or higher	(X)	32.0%	+/-1.1
VETERAN STATUS			
Civilian population 18 years and over	+/-516	70,011	(X)
Civilian veterans	+/-425	9.3%	+/-0.6
DISABILITY STATUS OF THE CIVILIAN NONINSTITUTIONALIZED POPULATION			
Total Civilian Noninstitutionalized Population	+/-270	84,537	(X)
With a disability	+/-628	12.2%	+/-0.7
Under 18 years	+/-504	15,894	(X)
With a disability	+/-152	4.4%	+/-0.9
18 to 64 years	+/-546	57,533	(X)
With a disability	+/-495	9.8%	+/-0.9
65 years and over	+/-347	11,110	(X)
With a disability	+/-332	35.5%	+/-2.8
RESIDENCE 1 YEAR AGO			
Population 1 year and over	+/-187	85,278	(X)
Same house	+/-1,162	75.7%	+/-1.4
Different house in the U.S.	+/-1,140	23.6%	+/-1.3
Same county	+/-1,046	15.5%	+/-1.2
Different county	+/-593	8.2%	+/-0.7
Same state	+/-559	6.3%	+/-0.7
Different state	+/-265	1.9%	+/-0.3
Abroad	+/-176	0.6%	+/-0.2

Subject	Duluth city, Minnesota		
	Margin of Error	Percent	Percent Margin of Error
PLACE OF BIRTH			
Total population	+/-50	86,239	(X)
Native	+/-324	97.0%	+/-0.4
Born in United States	+/-375	96.5%	+/-0.4
State of residence	+/-790	74.3%	+/-0.9
Different state	+/-755	22.2%	+/-0.9
Born in Puerto Rico, U.S. Island areas, or born abroad to American parent(s)	+/-125	0.5%	+/-0.1
Foreign born	+/-328	3.0%	+/-0.4
U.S. CITIZENSHIP STATUS			
Foreign-born population	+/-328	2,564	(X)
Naturalized U.S. citizen	+/-241	53.4%	+/-6.1
Not a U.S. citizen	+/-211	46.6%	+/-6.1
YEAR OF ENTRY			
Population born outside the United States	+/-377	3,011	(X)
Native	+/-125	447	(X)
Entered 2010 or later	+/-20	0.0%	+/-3.8
Entered before 2010	+/-125	100.0%	+/-3.8
Foreign born	+/-328	2,564	(X)
Entered 2010 or later	+/-93	7.6%	+/-3.6
Entered before 2010	+/-322	92.4%	+/-3.6
WORLD REGION OF BIRTH OF FOREIGN BORN			
Foreign-born population, excluding population born at sea	+/-328	2,564	(X)
Europe	+/-190	24.5%	+/-5.9
Asia	+/-128	36.4%	+/-4.2
Africa	+/-156	11.7%	+/-5.5
Oceania	+/-29	0.7%	+/-1.1
Latin America	+/-103	13.9%	+/-3.8
Northern America	+/-102	12.8%	+/-4.1
LANGUAGE SPOKEN AT HOME			
Population 5 years and over	+/-279	81,413	(X)
English only	+/-608	95.1%	+/-0.6
Language other than English	+/-503	4.9%	+/-0.6
Speak English less than "very well"	+/-228	1.5%	+/-0.3
Spanish	+/-292	1.5%	+/-0.4
Speak English less than "very well"	+/-149	0.5%	+/-0.2
Other Indo-European languages	+/-262	1.8%	+/-0.3
Speak English less than "very well"	+/-118	0.4%	+/-0.1
Asian and Pacific Islander languages	+/-179	1.0%	+/-0.2
Speak English less than "very well"	+/-116	0.5%	+/-0.1
Other languages	+/-149	0.5%	+/-0.2
Speak English less than "very well"	+/-64	0.1%	+/-0.1
ANCESTRY			
Total population	+/-50	86,239	(X)
American	+/-407	2.7%	+/-0.5
Arab	+/-81	0.2%	+/-0.1
Czech	+/-278	1.1%	+/-0.3
Danish	+/-144	0.8%	+/-0.2
Dutch	+/-271	1.4%	+/-0.3
English	+/-554	7.2%	+/-0.6
French (except Basque)	+/-476	4.6%	+/-0.6
French Canadian	+/-252	1.9%	+/-0.3

Subject	Duluth city, Minnesota		
	Margin of Error	Percent	Percent Margin of Error
German	+/-892	24.9%	+/-1.0
Greek	+/-227	0.6%	+/-0.3
Hungarian	+/-110	0.3%	+/-0.1
Irish	+/-797	11.9%	+/-0.9
Italian	+/-543	5.3%	+/-0.6
Lithuanian	+/-154	0.4%	+/-0.2
Norwegian	+/-751	16.0%	+/-0.9
Polish	+/-567	6.9%	+/-0.7
Portuguese	+/-99	0.2%	+/-0.1
Russian	+/-180	0.7%	+/-0.2
Scotch-Irish	+/-179	0.8%	+/-0.2
Scottish	+/-291	1.9%	+/-0.3
Slovak	+/-107	0.2%	+/-0.1
Subsaharan African	+/-209	0.6%	+/-0.2
Swedish	+/-684	14.2%	+/-0.8
Swiss	+/-104	0.3%	+/-0.1
Ukrainian	+/-101	0.3%	+/-0.1
Welsh	+/-103	0.4%	+/-0.1
West Indian (excluding Hispanic origin groups)	+/-32	0.0%	+/-0.1

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

Fertility data are not available for certain geographic areas due to problems with data collection. See Errata Note #92 for details.

The Census Bureau introduced a new set of disability questions in the 2008 ACS questionnaire. Accordingly, comparisons of disability data from 2008 or later with data from prior years are not recommended. For more information on these questions and their evaluation in the 2006 ACS Content Test, see the Evaluation Report Covering Disability.

While the 2008-2012 American Community Survey (ACS) data generally reflect the December 2009 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2000 data. Boundaries for urban areas have not been updated since Census 2000. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2008-2012 American Community Survey

Explanation of Symbols:

1. An '**' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '***' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '*****' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.

DP03

SELECTED ECONOMIC CHARACTERISTICS

2008-2012 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Subject	Minnesota				Duluth city, Minnesota
	Estimate	Margin of Error	Percent	Percent Margin of Error	Estimate
EMPLOYMENT STATUS					
Population 16 years and over	4,180,087	+/-1,300	4,180,087	(X)	72,249
In labor force	2,955,309	+/-4,322	70.7%	+/-0.1	47,016
Civilian labor force	2,952,483	+/-4,309	70.6%	+/-0.1	46,872
Employed	2,745,021	+/-5,149	65.7%	+/-0.1	42,676
Unemployed	207,462	+/-2,825	5.0%	+/-0.1	4,196
Armed Forces	2,826	+/-308	0.1%	+/-0.1	144
Not in labor force	1,224,778	+/-4,158	29.3%	+/-0.1	25,233
Civilian labor force	2,952,483	+/-4,309	2,952,483	(X)	46,872
Percent Unemployed	(X)	(X)	7.0%	+/-0.1	(X)
Females 16 years and over	2,121,935	+/-994	2,121,935	(X)	37,045
In labor force	1,414,553	+/-3,571	66.7%	+/-0.2	23,391
Civilian labor force	1,414,253	+/-3,552	66.6%	+/-0.2	23,367
Employed	1,329,409	+/-3,759	62.7%	+/-0.2	21,704
Own children under 6 years	414,682	+/-1,542	414,682	(X)	5,677
All parents in family in labor force	304,393	+/-2,870	73.4%	+/-0.6	4,256
Own children 6 to 17 years	823,846	+/-1,809	823,846	(X)	9,641
All parents in family in labor force	646,611	+/-3,553	78.5%	+/-0.4	7,144
COMMUTING TO WORK					
Workers 16 years and over	2,697,932	+/-5,449	2,697,932	(X)	41,863
Car, truck, or van -- drove alone	2,099,329	+/-6,253	77.8%	+/-0.2	31,426
Car, truck, or van -- carpooled	246,652	+/-3,093	9.1%	+/-0.1	3,843
Public transportation (excluding taxicab)	93,219	+/-2,062	3.5%	+/-0.1	2,074
Walked	76,945	+/-1,885	2.9%	+/-0.1	2,158
Other means	42,946	+/-1,414	1.6%	+/-0.1	723
Worked at home	138,841	+/-2,131	5.1%	+/-0.1	1,639
Mean travel time to work (minutes)	22.7	+/-0.1	(X)	(X)	16.6
OCCUPATION					

Subject	Minnesota				Duluth city, Minnesota
	Estimate	Margin of Error	Percent	Percent Margin of Error	Estimate
Civilian employed population 16 years and over	2,745,021	+/-5,149	2,745,021	(X)	42,676
Management, business, science, and arts occupations	1,056,181	+/-6,332	38.5%	+/-0.2	15,191
Service occupations	448,956	+/-3,914	16.4%	+/-0.1	10,683
Sales and office occupations	663,263	+/-4,207	24.2%	+/-0.1	10,182
Natural resources, construction, and maintenance occupations	224,300	+/-2,682	8.2%	+/-0.1	2,981
Production, transportation, and material moving occupations	352,321	+/-3,203	12.8%	+/-0.1	3,639
INDUSTRY					
Civilian employed population 16 years and over	2,745,021	+/-5,149	2,745,021	(X)	42,676
Agriculture, forestry, fishing and hunting, and mining	64,832	+/-1,343	2.4%	+/-0.1	355
Construction	155,001	+/-2,378	5.6%	+/-0.1	1,788
Manufacturing	376,376	+/-3,992	13.7%	+/-0.1	2,561
Wholesale trade	81,461	+/-1,506	3.0%	+/-0.1	658
Retail trade	318,099	+/-3,378	11.6%	+/-0.1	5,516
Transportation and warehousing, and utilities	125,477	+/-2,058	4.6%	+/-0.1	2,006
Information	54,695	+/-1,446	2.0%	+/-0.1	799
Finance and insurance, and real estate and rental and leasing	198,275	+/-2,650	7.2%	+/-0.1	2,361
Professional, scientific, and management, and administrative and waste management services	261,704	+/-2,938	9.5%	+/-0.1	2,866
Educational services, and health care and social assistance	668,930	+/-5,672	24.4%	+/-0.2	14,539
Arts, entertainment, and recreation, and accommodation and food services	222,492	+/-2,980	8.1%	+/-0.1	5,626
Other services, except public administration	123,971	+/-2,063	4.5%	+/-0.1	1,998
Public administration	93,708	+/-1,700	3.4%	+/-0.1	1,603
CLASS OF WORKER					
Civilian employed population 16 years and over	2,745,021	+/-5,149	2,745,021	(X)	42,676
Private wage and salary workers	2,235,579	+/-5,752	81.4%	+/-0.1	34,605
Government workers	338,159	+/-3,616	12.3%	+/-0.1	6,417
Self-employed in own not incorporated business workers	167,523	+/-2,156	6.1%	+/-0.1	1,605
Unpaid family workers	3,760	+/-380	0.1%	+/-0.1	49
INCOME AND BENEFITS (IN 2012 INFLATION-ADJUSTED DOLLARS)					
Total households	2,101,875	+/-4,843	2,101,875	(X)	35,862
Less than $10,000	119,065	+/-1,945	5.7%	+/-0.1	3,889
$10,000 to $14,999	96,221	+/-2,024	4.6%	+/-0.1	2,498
$15,000 to $24,999	194,014	+/-2,781	9.2%	+/-0.1	4,721
$25,000 to $34,999	198,822	+/-2,794	9.5%	+/-0.1	4,713
$35,000 to $49,999	281,702	+/-3,082	13.4%	+/-0.1	4,577
$50,000 to $74,999	408,073	+/-3,588	19.4%	+/-0.2	6,455
$75,000 to $99,999	298,955	+/-3,049	14.2%	+/-0.1	3,725
$100,000 to $149,999	306,531	+/-3,172	14.6%	+/-0.1	3,392
$150,000 to $199,999	104,996	+/-1,537	5.0%	+/-0.1	1,044
$200,000 or more	93,496	+/-1,774	4.4%	+/-0.1	848
Median household income (dollars)	59,126	+/-224	(X)	(X)	41,311
Mean household income (dollars)	76,372	+/-293	(X)	(X)	57,591
With earnings	1,707,467	+/-4,296	81.2%	+/-0.1	27,450
Mean earnings (dollars)	77,623	+/-349	(X)	(X)	58,729
With Social Security	550,619	+/-2,609	26.2%	+/-0.1	10,462
Mean Social Security income (dollars)	17,288	+/-61	(X)	(X)	16,142
With retirement income	324,440	+/-2,444	15.4%	+/-0.1	6,289
Mean retirement income (dollars)	21,836	+/-225	(X)	(X)	20,371
With Supplemental Security Income	71,838	+/-1,271	3.4%	+/-0.1	1,915

Subject	Minnesota				Duluth city, Minnesota
	Estimate	Margin of Error	Percent	Percent Margin of Error	Estimate
Mean Supplemental Security Income (dollars)	9,130	+/-114	(X)	(X)	8,460
With cash public assistance income	71,285	+/-1,613	3.4%	+/-0.1	1,949
Mean cash public assistance income (dollars)	3,302	+/-121	(X)	(X)	2,792
With Food Stamp/SNAP benefits in the past 12 months	156,438	+/-2,231	7.4%	+/-0.1	4,630
Families	1,365,845	+/-5,379	1,365,845	(X)	19,260
Less than $10,000	41,773	+/-1,125	3.1%	+/-0.1	1,180
$10,000 to $14,999	30,301	+/-1,189	2.2%	+/-0.1	644
$15,000 to $24,999	80,714	+/-1,716	5.9%	+/-0.1	1,555
$25,000 to $34,999	102,351	+/-2,031	7.5%	+/-0.1	2,025
$35,000 to $49,999	160,579	+/-2,260	11.8%	+/-0.2	2,166
$50,000 to $74,999	277,881	+/-2,578	20.3%	+/-0.2	4,155
$75,000 to $99,999	234,790	+/-2,779	17.2%	+/-0.2	2,896
$100,000 to $149,999	260,891	+/-2,887	19.1%	+/-0.2	2,972
$150,000 to $199,999	93,097	+/-1,486	6.8%	+/-0.1	930
$200,000 or more	83,468	+/-1,779	6.1%	+/-0.1	737
Median family income (dollars)	74,032	+/-296	(X)	(X)	61,690
Mean family income (dollars)	91,321	+/-439	(X)	(X)	75,873
Per capita income (dollars)	30,656	+/-130	(X)	(X)	24,480
Nonfamily households	736,030	+/-3,723	736,030	(X)	16,602
Median nonfamily income (dollars)	34,274	+/-287	(X)	(X)	25,951
Mean nonfamily income (dollars)	45,819	+/-346	(X)	(X)	34,790
Median earnings for workers (dollars)	32,134	+/-107	(X)	(X)	21,037
Median earnings for male full-time, year-round workers (dollars)	51,594	+/-218	(X)	(X)	44,707
Median earnings for female full-time, year-round workers (dollars)	40,645	+/-161	(X)	(X)	33,868
HEALTH INSURANCE COVERAGE					
Civilian noninstitutionalized population	5,253,764	+/-309	5,253,764	(X)	84,537
With health insurance coverage	4,799,301	+/-7,605	91.3%	+/-0.1	77,657
With private health insurance	4,053,907	+/-12,380	77.2%	+/-0.2	61,952
With public coverage	1,389,463	+/-8,125	26.4%	+/-0.2	26,516
No health insurance coverage	454,463	+/-7,585	8.7%	+/-0.1	6,880
Civilian noninstitutionalized population under 18 years	1,278,246	+/-393	1,278,246	(X)	15,894
No health insurance coverage	78,449	+/-2,620	6.1%	+/-0.2	1,017
Civilian noninstitutionalized population 18 to 64 years	3,316,728	+/-779	3,316,728	(X)	57,533
In labor force:	2,781,059	+/-4,077	2,781,059	(X)	44,635
Employed:	2,591,089	+/-4,845	2,591,089	(X)	40,686
With health insurance coverage	2,335,523	+/-6,887	90.1%	+/-0.2	36,306
With private health insurance	2,191,310	+/-7,136	84.6%	+/-0.2	33,280
With public coverage	200,669	+/-2,778	7.7%	+/-0.1	4,065
No health insurance coverage	255,566	+/-4,542	9.9%	+/-0.2	4,380
Unemployed:	189,970	+/-2,651	189,970	(X)	3,949
With health insurance coverage	132,871	+/-2,303	69.9%	+/-0.8	3,177
With private health insurance	85,365	+/-1,707	44.9%	+/-0.8	1,924
With public coverage	52,445	+/-1,671	27.6%	+/-0.7	1,374
No health insurance coverage	57,099	+/-1,823	30.1%	+/-0.8	772
Not in labor force:	535,669	+/-3,932	535,669	(X)	12,898
With health insurance coverage	474,382	+/-3,358	88.6%	+/-0.3	12,198
With private health insurance	328,437	+/-3,144	61.3%	+/-0.5	8,206
With public coverage	183,709	+/-2,558	34.3%	+/-0.4	4,658
No health insurance coverage	61,287	+/-1,838	11.4%	+/-0.3	700

Subject	Minnesota				Duluth city, Minnesota
	Estimate	Margin of Error	Percent	Percent Margin of Error	Estimate
PERCENTAGE OF FAMILIES AND PEOPLE WHOSE INCOME IN THE PAST 12 MONTHS IS BELOW THE POVERTY LEVEL					
All families	(X)	(X)	7.2%	+/-0.1	(X)
With related children under 18 years	(X)	(X)	11.9%	+/-0.2	(X)
With related children under 5 years only	(X)	(X)	14.1%	+/-0.6	(X)
Married couple families	(X)	(X)	3.0%	+/-0.1	(X)
With related children under 18 years	(X)	(X)	4.3%	+/-0.2	(X)
With related children under 5 years only	(X)	(X)	3.4%	+/-0.4	(X)
Families with female householder, no husband present	(X)	(X)	27.4%	+/-0.6	(X)
With related children under 18 years	(X)	(X)	35.2%	+/-0.7	(X)
With related children under 5 years only	(X)	(X)	46.6%	+/-1.9	(X)
All people	(X)	(X)	11.2%	+/-0.1	(X)
Under 18 years	(X)	(X)	14.3%	+/-0.3	(X)
Related children under 18 years	(X)	(X)	13.8%	+/-0.3	(X)
Related children under 5 years	(X)	(X)	16.7%	+/-0.5	(X)
Related children 5 to 17 years	(X)	(X)	12.7%	+/-0.3	(X)
18 years and over	(X)	(X)	10.2%	+/-0.1	(X)
18 to 64 years	(X)	(X)	10.6%	+/-0.1	(X)
65 years and over	(X)	(X)	8.3%	+/-0.2	(X)
People in families	(X)	(X)	8.1%	+/-0.2	(X)
Unrelated individuals 15 years and over	(X)	(X)	23.5%	+/-0.3	(X)

Subject	Duluth city, Minnesota		
	Margin of Error	Percent	Percent Margin of Error
EMPLOYMENT STATUS			
Population 16 years and over	+/-414	72,249	(X)
In labor force	+/-756	65.1%	+/-1.0
Civilian labor force	+/-759	64.9%	+/-1.0
Employed	+/-775	59.1%	+/-1.0
Unemployed	+/-395	5.8%	+/-0.5
Armed Forces	+/-76	0.2%	+/-0.1
Not in labor force	+/-735	34.9%	+/-1.0
Civilian labor force	+/-759	46,872	(X)
Percent Unemployed	(X)	9.0%	+/-0.8
Females 16 years and over	+/-444	37,045	(X)
In labor force	+/-521	63.1%	+/-1.1
Civilian labor force	+/-526	63.1%	+/-1.1
Employed	+/-503	58.6%	+/-1.2
Own children under 6 years	+/-315	5,677	(X)
All parents in family in labor force	+/-315	75.0%	+/-4.7
Own children 6 to 17 years	+/-492	9,641	(X)
All parents in family in labor force	+/-439	74.1%	+/-3.7
COMMUTING TO WORK			
Workers 16 years and over	+/-841	41,863	(X)
Car, truck, or van -- drove alone	+/-912	75.1%	+/-1.5
Car, truck, or van -- carpooled	+/-373	9.2%	+/-0.9
Public transportation (excluding taxicab)	+/-273	5.0%	+/-0.7
Walked	+/-310	5.2%	+/-0.7
Other means	+/-153	1.7%	+/-0.4
Worked at home	+/-238	3.9%	+/-0.6
Mean travel time to work (minutes)	+/-0.5	(X)	(X)
OCCUPATION			
Civilian employed population 16 years and over	+/-775	42,676	(X)
Management, business, science, and arts occupations	+/-674	35.6%	+/-1.4
Service occupations	+/-708	25.0%	+/-1.6
Sales and office occupations	+/-603	23.9%	+/-1.3
Natural resources, construction, and maintenance occupations	+/-332	7.0%	+/-0.8
Production, transportation, and material moving occupations	+/-311	8.5%	+/-0.7
INDUSTRY			
Civilian employed population 16 years and over	+/-775	42,676	(X)
Agriculture, forestry, fishing and hunting, and mining	+/-105	0.8%	+/-0.2
Construction	+/-235	4.2%	+/-0.6
Manufacturing	+/-340	6.0%	+/-0.8
Wholesale trade	+/-139	1.5%	+/-0.3
Retail trade	+/-469	12.9%	+/-1.1
Transportation and warehousing, and utilities	+/-286	4.7%	+/-0.7
Information	+/-166	1.9%	+/-0.4
Finance and insurance, and real estate and rental and leasing	+/-253	5.5%	+/-0.6
Professional, scientific, and management, and administrative and waste management services	+/-305	6.7%	+/-0.7
Educational services, and health care and social assistance	+/-747	34.1%	+/-1.7
Arts, entertainment, and recreation, and accommodation and food services	+/-542	13.2%	+/-1.2

Subject	Duluth city, Minnesota		
	Margin of Error	Percent	Percent Margin of Error
Other services, except public administration	+/-298	4.7%	+/-0.7
Public administration	+/-247	3.8%	+/-0.6
CLASS OF WORKER			
Civilian employed population 16 years and over	+/-775	42,676	(X)
Private wage and salary workers	+/-801	81.1%	+/-1.1
Government workers	+/-426	15.0%	+/-1.0
Self-employed in own not incorporated business workers	+/-220	3.8%	+/-0.5
Unpaid family workers	+/-32	0.1%	+/-0.1
INCOME AND BENEFITS (IN 2012 INFLATION-ADJUSTED DOLLARS)			
Total households	+/-682	35,862	(X)
Less than $10,000	+/-367	10.8%	+/-1.0
$10,000 to $14,999	+/-325	7.0%	+/-0.9
$15,000 to $24,999	+/-466	13.2%	+/-1.2
$25,000 to $34,999	+/-398	13.1%	+/-1.0
$35,000 to $49,999	+/-329	12.8%	+/-0.9
$50,000 to $74,999	+/-361	18.0%	+/-1.0
$75,000 to $99,999	+/-348	10.4%	+/-1.0
$100,000 to $149,999	+/-281	9.5%	+/-0.8
$150,000 to $199,999	+/-167	2.9%	+/-0.5
$200,000 or more	+/-154	2.4%	+/-0.4
Median household income (dollars)	+/-1,517	(X)	(X)
Mean household income (dollars)	+/-1,557	(X)	(X)
With earnings	+/-633	76.5%	+/-1.0
Mean earnings (dollars)	+/-1,976	(X)	(X)
With Social Security	+/-471	29.2%	+/-1.1
Mean Social Security income (dollars)	+/-499	(X)	(X)
With retirement income	+/-398	17.5%	+/-1.0
Mean retirement income (dollars)	+/-1,376	(X)	(X)
With Supplemental Security Income	+/-239	5.3%	+/-0.6
Mean Supplemental Security Income (dollars)	+/-664	(X)	(X)
With cash public assistance income	+/-288	5.4%	+/-0.8
Mean cash public assistance income (dollars)	+/-492	(X)	(X)
With Food Stamp/SNAP benefits in the past 12 months	+/-378	12.9%	+/-1.0
Families	+/-470	19,260	(X)
Less than $10,000	+/-207	6.1%	+/-1.0
$10,000 to $14,999	+/-162	3.3%	+/-0.8
$15,000 to $24,999	+/-239	8.1%	+/-1.2
$25,000 to $34,999	+/-270	10.5%	+/-1.4
$35,000 to $49,999	+/-267	11.2%	+/-1.3
$50,000 to $74,999	+/-320	21.6%	+/-1.7
$75,000 to $99,999	+/-293	15.0%	+/-1.4
$100,000 to $149,999	+/-257	15.4%	+/-1.4
$150,000 to $199,999	+/-170	4.8%	+/-0.9
$200,000 or more	+/-142	3.8%	+/-0.7
Median family income (dollars)	+/-1,707	(X)	(X)
Mean family income (dollars)	+/-2,465	(X)	(X)
Per capita income (dollars)	+/-639	(X)	(X)
Nonfamily households	+/-707	16,602	(X)
Median nonfamily income (dollars)	+/-1,254	(X)	(X)
Mean nonfamily income (dollars)	+/-1,974	(X)	(X)

Subject	Duluth city, Minnesota		
	Margin of Error	Percent	Percent Margin of Error
Median earnings for workers (dollars)	+/-752	(X)	(X)
Median earnings for male full-time, year-round workers (dollars)	+/-1,737	(X)	(X)
Median earnings for female full-time, year-round workers (dollars)	+/-1,492	(X)	(X)
HEALTH INSURANCE COVERAGE			
Civilian noninstitutionalized population	+/-270	84,537	(X)
With health insurance coverage	+/-675	91.9%	+/-0.7
With private health insurance	+/-1,034	73.3%	+/-1.2
With public coverage	+/-890	31.4%	+/-1.1
No health insurance coverage	+/-617	8.1%	+/-0.7
Civilian noninstitutionalized population under 18 years	+/-504	15,894	(X)
No health insurance coverage	+/-284	6.4%	+/-1.8
Civilian noninstitutionalized population 18 to 64 years	+/-546	57,533	(X)
In labor force:	+/-719	44,635	(X)
Employed:	+/-737	40,686	(X)
With health insurance coverage	+/-732	89.2%	+/-1.0
With private health insurance	+/-817	81.8%	+/-1.4
With public coverage	+/-439	10.0%	+/-1.1
No health insurance coverage	+/-427	10.8%	+/-1.0
Unemployed:	+/-401	3,949	(X)
With health insurance coverage	+/-362	80.5%	+/-4.0
With private health insurance	+/-246	48.7%	+/-4.1
With public coverage	+/-233	34.8%	+/-4.5
No health insurance coverage	+/-173	19.5%	+/-4.0
Not in labor force:	+/-614	12,898	(X)
With health insurance coverage	+/-593	94.6%	+/-1.2
With private health insurance	+/-571	63.6%	+/-2.7
With public coverage	+/-416	36.1%	+/-3.0
No health insurance coverage	+/-165	5.4%	+/-1.2
PERCENTAGE OF FAMILIES AND PEOPLE WHOSE INCOME IN THE PAST 12 MONTHS IS BELOW THE POVERTY LEVEL			
All families	(X)	12.3%	+/-1.4
With related children under 18 years	(X)	22.7%	+/-2.6
With related children under 5 years only	(X)	29.7%	+/-6.4
Married couple families	(X)	3.4%	+/-0.9
With related children under 18 years	(X)	5.3%	+/-1.9
With related children under 5 years only	(X)	5.4%	+/-3.1
Families with female householder, no husband present	(X)	41.6%	+/-5.4
With related children under 18 years	(X)	53.0%	+/-6.4
With related children under 5 years only	(X)	68.7%	+/-10.9
All people	(X)	21.9%	+/-1.3
Under 18 years	(X)	25.5%	+/-3.1
Related children under 18 years	(X)	24.9%	+/-3.2
Related children under 5 years	(X)	31.4%	+/-5.4
Related children 5 to 17 years	(X)	22.2%	+/-3.4
18 years and over	(X)	21.0%	+/-1.1
18 to 64 years	(X)	23.5%	+/-1.3
65 years and over	(X)	8.8%	+/-1.6
People in families	(X)	13.5%	+/-1.6
Unrelated individuals 15 years and over	(X)	39.4%	+/-2.4

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

There were changes in the edit between 2009 and 2010 regarding Supplemental Security Income (SSI) and Social Security. The changes in the edit loosened restrictions on disability requirements for receipt of SSI resulting in an increase in the total number of SSI recipients in the American Community Survey. The changes also loosened restrictions on possible reported monthly amounts in Social Security income resulting in higher Social Security aggregate amounts. These results more closely match administrative counts compiled by the Social Security Administration.

Workers include members of the Armed Forces and civilians who were at work last week.

Industry codes are 4-digit codes and are based on the North American Industry Classification System 2007. The Industry categories adhere to the guidelines issued in Clarification Memorandum No. 2, "NAICS Alternate Aggregation Structure for Use By U.S. Statistical Agencies," issued by the Office of Management and Budget.

While the 2008-2012 American Community Survey (ACS) data generally reflect the December 2009 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2000 data. Boundaries for urban areas have not been updated since Census 2000. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2008-2012 American Community Survey

Explanation of Symbols:

1. An '**' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '***' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '*****' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.

S1810

DISABILITY CHARACTERISTICS

2008-2012 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Subject	Minnesota				
	Total		With a disability		Percent with a disability
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate
Total civilian noninstitutionalized population	5,253,764	+/-309	524,148	+/-4,070	10.0%
Population under 5 years	352,379	+/-419	2,406	+/-288	0.7%
With a hearing difficulty	(X)	(X)	1,621	+/-234	0.5%
With a vision difficulty	(X)	(X)	1,377	+/-216	0.4%
Population 5 to 17 years	925,867	+/-549	44,725	+/-1,317	4.8%
With a hearing difficulty	(X)	(X)	5,676	+/-427	0.6%
With a vision difficulty	(X)	(X)	4,799	+/-399	0.5%
With a cognitive difficulty	(X)	(X)	35,263	+/-1,200	3.8%
With an ambulatory difficulty	(X)	(X)	4,754	+/-366	0.5%
With a self-care difficulty	(X)	(X)	9,374	+/-585	1.0%
Population 18 to 64 years	3,316,728	+/-779	265,732	+/-2,900	8.0%
With a hearing difficulty	(X)	(X)	64,917	+/-1,545	2.0%
With a vision difficulty	(X)	(X)	33,105	+/-1,327	1.0%
With a cognitive difficulty	(X)	(X)	121,381	+/-1,999	3.7%
With an ambulatory difficulty	(X)	(X)	112,243	+/-2,066	3.4%
With a self-care difficulty	(X)	(X)	44,885	+/-1,231	1.4%
With an independent living difficulty	(X)	(X)	89,038	+/-1,826	2.7%
Population 65 years and over	658,790	+/-493	211,285	+/-1,896	32.1%
With a hearing difficulty	(X)	(X)	98,071	+/-1,367	14.9%
With a vision difficulty	(X)	(X)	32,760	+/-990	5.0%
With a cognitive difficulty	(X)	(X)	43,786	+/-969	6.6%
With an ambulatory difficulty	(X)	(X)	121,903	+/-1,559	18.5%
With a self-care difficulty	(X)	(X)	43,150	+/-1,123	6.5%
With an independent living difficulty	(X)	(X)	82,860	+/-1,352	12.6%
SEX					
Male	2,604,024	+/-1,013	264,256	+/-2,411	10.1%
Female	2,649,740	+/-990	259,892	+/-2,658	9.8%
RACE AND HISPANIC OR LATINO ORIGIN					
One Race	5,130,717	+/-3,593	512,556	+/-4,022	10.0%

Subject	Minnesota				
	Total		With a disability		Percent with a disability
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate
White alone	4,524,068	+/-3,139	454,254	+/-3,761	10.0%
Black or African American alone	263,740	+/-2,361	31,567	+/-1,262	12.0%
American Indian and Alaska Native alone	54,702	+/-1,199	8,572	+/-567	15.7%
Asian alone	215,581	+/-1,452	13,471	+/-713	6.2%
Native Hawaiian and Other Pacific Islander alone	2,057	+/-372	291	+/-126	14.1%
Some other race alone	70,569	+/-3,235	4,401	+/-572	6.2%
Two or more races	123,047	+/-3,599	11,592	+/-854	9.4%
White alone, not Hispanic or Latino	4,366,040	+/-968	444,360	+/-3,725	10.2%
Hispanic or Latino (of any race)	246,851	+/-283	16,003	+/-827	6.5%
PERCENT IMPUTED					
Disability status	4.1%	(X)	(X)	(X)	(X)
Hearing difficulty	2.7%	(X)	(X)	(X)	(X)
Vision difficulty	3.0%	(X)	(X)	(X)	(X)
Cognitive difficulty	3.0%	(X)	(X)	(X)	(X)
Ambulatory difficulty	3.0%	(X)	(X)	(X)	(X)
Self-care difficulty	3.0%	(X)	(X)	(X)	(X)
Independent living difficulty	2.9%	(X)	(X)	(X)	(X)

Subject	Minnesota	Duluth city, Minnesota			
	Percent with a disability	Total		With a disability	
	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total civilian noninstitutionalized population	+/-0.1	84,537	+/-270	10,308	+/-628
Population under 5 years	+/-0.1	4,817	+/-279	18	+/-25
With a hearing difficulty	+/-0.1	(X)	(X)	18	+/-25
With a vision difficulty	+/-0.1	(X)	(X)	0	+/-20
Population 5 to 17 years	+/-0.1	11,077	+/-479	689	+/-145
With a hearing difficulty	+/-0.1	(X)	(X)	50	+/-40
With a vision difficulty	+/-0.1	(X)	(X)	58	+/-47
With a cognitive difficulty	+/-0.1	(X)	(X)	519	+/-137
With an ambulatory difficulty	+/-0.1	(X)	(X)	114	+/-58
With a self-care difficulty	+/-0.1	(X)	(X)	146	+/-64
Population 18 to 64 years	+/-0.1	57,533	+/-546	5,659	+/-495
With a hearing difficulty	+/-0.1	(X)	(X)	1,046	+/-210
With a vision difficulty	+/-0.1	(X)	(X)	886	+/-194
With a cognitive difficulty	+/-0.1	(X)	(X)	3,134	+/-422
With an ambulatory difficulty	+/-0.1	(X)	(X)	2,433	+/-329
With a self-care difficulty	+/-0.1	(X)	(X)	873	+/-165
With an independent living difficulty	+/-0.1	(X)	(X)	1,941	+/-271
Population 65 years and over	+/-0.3	11,110	+/-347	3,942	+/-332
With a hearing difficulty	+/-0.2	(X)	(X)	1,842	+/-208
With a vision difficulty	+/-0.2	(X)	(X)	537	+/-132
With a cognitive difficulty	+/-0.1	(X)	(X)	781	+/-173
With an ambulatory difficulty	+/-0.2	(X)	(X)	2,338	+/-257
With a self-care difficulty	+/-0.2	(X)	(X)	790	+/-143
With an independent living difficulty	+/-0.2	(X)	(X)	1,645	+/-263
SEX					
Male	+/-0.1	41,535	+/-508	5,123	+/-389
Female	+/-0.1	43,002	+/-552	5,185	+/-467
RACE AND HISPANIC OR LATINO ORIGIN					
One Race	+/-0.1	82,266	+/-413	10,092	+/-625
White alone	+/-0.1	76,765	+/-591	9,394	+/-599
Black or African American alone	+/-0.5	1,845	+/-306	291	+/-119
American Indian and Alaska Native alone	+/-1.0	1,920	+/-381	319	+/-97
Asian alone	+/-0.3	1,367	+/-192	66	+/-39
Native Hawaiian and Other Pacific Islander alone	+/-5.6	28	+/-30	0	+/-20
Some other race alone	+/-0.8	341	+/-200	22	+/-21
Two or more races	+/-0.6	2,271	+/-343	216	+/-99
White alone, not Hispanic or Latino	+/-0.1	76,142	+/-569	9,340	+/-603
Hispanic or Latino (of any race)	+/-0.3	1,134	+/-230	72	+/-44
PERCENT IMPUTED					
Disability status	(X)	3.9%	(X)	(X)	(X)
Hearing difficulty	(X)	2.3%	(X)	(X)	(X)
Vision difficulty	(X)	2.6%	(X)	(X)	(X)
Cognitive difficulty	(X)	2.8%	(X)	(X)	(X)
Ambulatory difficulty	(X)	2.6%	(X)	(X)	(X)
Self-care difficulty	(X)	2.6%	(X)	(X)	(X)
Independent living difficulty	(X)	2.7%	(X)	(X)	(X)

Subject	Duluth city, Minnesota	
	Percent with a disability	
	Estimate	Margin of Error
Total civilian noninstitutionalized population	12.2%	+/-0.7
Population under 5 years	0.4%	+/-0.5
With a hearing difficulty	0.4%	+/-0.5
With a vision difficulty	0.0%	+/-0.4
Population 5 to 17 years	6.2%	+/-1.3
With a hearing difficulty	0.5%	+/-0.4
With a vision difficulty	0.5%	+/-0.4
With a cognitive difficulty	4.7%	+/-1.2
With an ambulatory difficulty	1.0%	+/-0.5
With a self-care difficulty	1.3%	+/-0.6
Population 18 to 64 years	9.8%	+/-0.9
With a hearing difficulty	1.8%	+/-0.4
With a vision difficulty	1.5%	+/-0.3
With a cognitive difficulty	5.4%	+/-0.7
With an ambulatory difficulty	4.2%	+/-0.6
With a self-care difficulty	1.5%	+/-0.3
With an independent living difficulty	3.4%	+/-0.5
Population 65 years and over	35.5%	+/-2.8
With a hearing difficulty	16.6%	+/-1.8
With a vision difficulty	4.8%	+/-1.2
With a cognitive difficulty	7.0%	+/-1.5
With an ambulatory difficulty	21.0%	+/-2.3
With a self-care difficulty	7.1%	+/-1.3
With an independent living difficulty	14.8%	+/-2.3
SEX		
Male	12.3%	+/-0.9
Female	12.1%	+/-1.0
RACE AND HISPANIC OR LATINO ORIGIN		
One Race	12.3%	+/-0.8
White alone	12.2%	+/-0.8
Black or African American alone	15.8%	+/-5.9
American Indian and Alaska Native alone	16.6%	+/-5.6
Asian alone	4.8%	+/-2.9
Native Hawaiian and Other Pacific Islander alone	0.0%	+/-41.1
Some other race alone	6.5%	+/-7.1
Two or more races	9.5%	+/-4.1
White alone, not Hispanic or Latino	12.3%	+/-0.8
Hispanic or Latino (of any race)	6.3%	+/-3.9
PERCENT IMPUTED		
Disability status	(X)	(X)
Hearing difficulty	(X)	(X)
Vision difficulty	(X)	(X)
Cognitive difficulty	(X)	(X)
Ambulatory difficulty	(X)	(X)
Self-care difficulty	(X)	(X)
Independent living difficulty	(X)	(X)

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of

error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

The Census Bureau introduced a new set of disability questions in the 2008 ACS questionnaire. Accordingly, comparisons of disability data from 2008 or later with data from prior years are not recommended. For more information on these questions and their evaluation in the 2006 ACS Content Test, see the Evaluation Report Covering Disability.

While the 2008-2012 American Community Survey (ACS) data generally reflect the December 2009 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2000 data. Boundaries for urban areas have not been updated since Census 2000. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2008-2012 American Community Survey

Explanation of Symbols:

1. An '**' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '***' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '*****' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.

S0804

MEANS OF TRANSPORTATION TO WORK BY SELECTED CHARACTERISTICS FOR WORKPLACE GEOGRAPHY

2008-2012 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Subject	Duluth city, Minnesota				
	Total		Car, truck, or van -- drove alone		Car, truck, or van -- carpooled
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate
Workers 16 years and over	57,858	+/-1,039	45,553	+/-940	5,603
AGE					
16 to 19 years	4.6%	+/-0.5	3.8%	+/-0.5	5.0%
20 to 24 years	15.5%	+/-0.8	14.7%	+/-0.9	12.8%
25 to 44 years	38.3%	+/-1.0	38.6%	+/-1.1	39.4%
45 to 54 years	23.7%	+/-0.8	24.4%	+/-0.9	27.0%
55 to 59 years	9.5%	+/-0.6	9.8%	+/-0.7	8.6%
60 years and over	8.4%	+/-0.6	8.7%	+/-0.7	7.3%
Median age (years)	40.7	+/-0.5	41.5	+/-0.6	42.0
SEX					
Male	47.9%	+/-0.7	48.8%	+/-0.8	43.2%
Female	52.1%	+/-0.7	51.2%	+/-0.8	56.8%
RACE AND HISPANIC OR LATINO ORIGIN					
One race	N	N	N	N	N
White	94.6%	+/-0.5	95.9%	+/-0.6	92.8%
Black or African American	1.1%	+/-0.3	0.8%	+/-0.3	0.4%
American Indian and Alaska Native	1.2%	+/-0.3	0.9%	+/-0.3	2.8%
Asian	1.6%	+/-0.3	1.0%	+/-0.3	1.7%
Native Hawaiian and Other Pacific Islander	N	N	N	N	N
Some other race	N	N	N	N	N
Two or more races	1.1%	+/-0.2	1.0%	+/-0.3	2.1%
Hispanic or Latino origin (of any race)	1.3%	+/-0.3	1.4%	+/-0.4	0.9%
White alone, not Hispanic or Latino origin	93.8%	+/-0.6	95.0%	+/-0.6	92.3%
NATIVITY AND CITIZENSHIP STATUS					
Native	97.3%	+/-0.5	97.7%	+/-0.5	97.6%
Foreign born	2.7%	+/-0.5	2.3%	+/-0.5	2.4%
Naturalized U.S. citizen	1.4%	+/-0.4	1.4%	+/-0.4	1.2%
Not a U.S. citizen	1.3%	+/-0.3	0.9%	+/-0.3	1.1%

Subject	Duluth city, Minnesota				
	Total		Car, truck, or van -- drove alone		Car, truck, or van -- carpooled
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate
LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH					
Speak language other than English	4.7%	+/-0.7	4.1%	+/-0.7	4.6%
Speak English "very well"	3.4%	+/-0.5	2.9%	+/-0.5	4.0%
Speak English less than "very well"	1.3%	+/-0.3	1.2%	+/-0.3	0.6%
EARNINGS IN THE PAST 12 MONTHS (IN 2012 INFLATION-ADJUSTED DOLLARS) FOR WORKERS					
Workers 16 years and over with earnings	57,850	+/-1,037	45,553	+/-940	5,603
$1 to $9,999 or loss	17.8%	+/-0.9	15.2%	+/-0.9	17.4%
$10,000 to $14,999	7.9%	+/-0.6	7.6%	+/-0.7	8.2%
$15,000 to $24,999	14.3%	+/-0.9	13.9%	+/-0.8	14.5%
$25,000 to $34,999	15.3%	+/-0.9	15.5%	+/-1.0	14.7%
$35,000 to $49,999	15.9%	+/-0.9	16.8%	+/-1.1	16.4%
$50,000 to $64,999	12.4%	+/-0.8	13.2%	+/-0.9	13.7%
$65,000 to $74,999	4.9%	+/-0.5	5.5%	+/-0.6	3.4%
$75,000 or more	11.4%	+/-0.7	12.1%	+/-0.8	11.6%
Median earnings (dollars)	31,403	+/-554	33,214	+/-945	31,623
POVERTY STATUS IN THE PAST 12 MONTHS					
Workers 16 years and over for whom poverty status is determined	56,692	+/-1,048	45,125	+/-936	5,567
Below 100 percent of the poverty level	9.8%	+/-0.8	8.1%	+/-0.8	9.5%
100 to 149 percent of the poverty level	6.2%	+/-0.7	5.6%	+/-0.8	5.6%
At or above 150 percent of the poverty level	84.0%	+/-1.0	86.2%	+/-1.0	84.8%
Workers 16 years and over	57,858	+/-1,039	45,553	+/-940	5,603
OCCUPATION					
Management, business, science, and arts occupations	38.3%	+/-1.3	38.9%	+/-1.5	39.2%
Service occupations	20.5%	+/-1.1	18.8%	+/-1.1	22.7%
Sales and office occupations	24.6%	+/-1.1	25.2%	+/-1.3	22.1%
Natural resources, construction, and maintenance occupations	7.6%	+/-0.6	8.1%	+/-0.7	8.0%
Production, transportation, and material moving occupations	8.7%	+/-0.6	8.7%	+/-0.6	8.0%
Military specific occupations	0.3%	+/-0.2	0.4%	+/-0.2	0.1%
INDUSTRY					
Agriculture, forestry, fishing and hunting, and mining	0.6%	+/-0.2	0.6%	+/-0.3	1.6%
Construction	4.3%	+/-0.4	4.5%	+/-0.5	6.6%
Manufacturing	6.6%	+/-0.6	6.8%	+/-0.7	5.9%
Wholesale trade	2.1%	+/-0.3	2.2%	+/-0.3	1.6%
Retail trade	11.5%	+/-0.8	11.8%	+/-1.0	7.9%
Transportation and warehousing, and utilities	4.4%	+/-0.5	4.8%	+/-0.6	2.6%
Information and finance and insurance, and real estate and rental and leasing	8.4%	+/-0.6	8.6%	+/-0.7	8.5%
Professional, scientific, and management, and administrative and waste management services	7.4%	+/-0.6	7.2%	+/-0.7	7.2%
Educational services, and health care and social assistance	35.3%	+/-1.3	34.9%	+/-1.3	35.0%
Arts, entertainment, and recreation, and accommodation and food services	10.3%	+/-0.9	9.3%	+/-0.8	13.1%
Other services (except public administration)	4.4%	+/-0.5	4.2%	+/-0.6	5.1%
Public administration	4.2%	+/-0.5	4.5%	+/-0.6	4.9%
Armed forces	0.6%	+/-0.2	0.7%	+/-0.2	0.1%
CLASS OF WORKER					
Private wage and salary workers	81.5%	+/-0.8	83.0%	+/-1.0	79.2%
Government workers	15.0%	+/-0.8	14.5%	+/-0.9	17.1%

Subject	Duluth city, Minnesota				
	Total		Car, truck, or van -- drove alone		Car, truck, or van -- carpooled
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate
Self-employed workers in own not incorporated business	3.4%	+/-0.4	2.5%	+/-0.4	3.5%
Unpaid family workers	0.1%	+/-0.1	0.0%	+/-0.1	0.3%
Workers 16 years and over who did not work at home	56,219	+/-1,025	45,553	+/-940	5,603
TIME ARRIVING AT WORK FROM HOME					
12:00 a.m. to 4:59 a.m.	1.8%	+/-0.3	1.8%	+/-0.3	1.4%
5:00 a.m. to 5:29 a.m.	1.9%	+/-0.4	2.0%	+/-0.4	1.7%
5:30 a.m. to 5:59 a.m.	3.7%	+/-0.4	4.0%	+/-0.5	3.7%
6:00 a.m. to 6:29 a.m.	5.3%	+/-0.5	5.5%	+/-0.6	5.4%
6:30 a.m. to 6:59 a.m.	11.4%	+/-0.7	11.7%	+/-0.8	13.3%
7:00 a.m. to 7:29 a.m.	11.3%	+/-0.8	11.6%	+/-0.8	10.3%
7:30 a.m. to 7:59 a.m.	18.1%	+/-1.0	18.1%	+/-1.2	25.0%
8:00 a.m. to 8:29 a.m.	11.2%	+/-0.7	11.2%	+/-0.8	12.9%
8:30 a.m. to 8:59 a.m.	6.7%	+/-0.7	6.4%	+/-0.7	5.9%
9:00 a.m. to 11:59 p.m.	28.6%	+/-1.3	27.7%	+/-1.4	20.3%
TRAVEL TIME TO WORK					
Less than 10 minutes	16.0%	+/-1.1	15.0%	+/-1.2	13.2%
10 to 14 minutes	20.8%	+/-1.2	21.1%	+/-1.3	18.7%
15 to 19 minutes	20.1%	+/-1.3	21.4%	+/-1.5	18.0%
20 to 24 minutes	16.3%	+/-1.0	16.3%	+/-1.0	16.2%
25 to 29 minutes	6.4%	+/-0.7	6.8%	+/-0.7	6.9%
30 to 34 minutes	8.6%	+/-0.6	8.4%	+/-0.6	10.5%
35 to 44 minutes	3.7%	+/-0.4	3.6%	+/-0.4	4.3%
45 to 59 minutes	4.0%	+/-0.4	3.5%	+/-0.4	6.5%
60 or more minutes	4.1%	+/-0.4	3.8%	+/-0.5	5.7%
Mean travel time to work (minutes)	N	N	N	N	N
Workers 16 years and over in households	56,463	+/-1,043	45,060	+/-937	5,503
HOUSING TENURE					
Owner-occupied housing units	74.1%	+/-1.0	76.5%	+/-1.2	77.1%
Renter-occupied housing units	25.9%	+/-1.0	23.5%	+/-1.2	22.9%
VEHICLES AVAILABLE					
No vehicle available	3.3%	+/-0.6	1.1%	+/-0.4	2.3%
1 vehicle available	19.3%	+/-1.3	17.6%	+/-1.3	20.3%
2 vehicles available	42.2%	+/-1.6	44.1%	+/-1.7	40.1%
3 or more vehicles available	35.3%	+/-1.4	37.1%	+/-1.6	37.3%
PERCENT IMPUTED					
Means of transportation to work	3.6%	(X)	(X)	(X)	(X)
Time arriving at work from home	11.5%	(X)	(X)	(X)	(X)
Travel time to work	6.0%	(X)	(X)	(X)	(X)
Vehicles available	0.6%	(X)	(X)	(X)	(X)

Subject	Duluth city, Minnesota		
	Car, truck, or van -- carpooled	Public transportation (excluding taxicab)	
	Margin of Error	Estimate	Margin of Error
Workers 16 years and over	+/-462	2,120	+/-275
AGE			
16 to 19 years	+/-1.6	6.1%	+/-3.4
20 to 24 years	+/-3.0	26.2%	+/-5.7
25 to 44 years	+/-3.8	43.3%	+/-5.7
45 to 54 years	+/-3.1	11.1%	+/-3.7
55 to 59 years	+/-2.0	6.0%	+/-2.4
60 years and over	+/-1.7	7.3%	+/-3.8
Median age (years)	+/-2.2	30.0	+/-2.3
SEX			
Male	+/-3.3	44.1%	+/-6.2
Female	+/-3.3	55.9%	+/-6.2
RACE AND HISPANIC OR LATINO ORIGIN			
One race	N	N	N
White	+/-1.8	74.0%	+/-6.4
Black or African American	+/-0.4	8.3%	+/-4.1
American Indian and Alaska Native	+/-1.5	4.0%	+/-3.0
Asian	+/-1.0	11.2%	+/-4.6
Native Hawaiian and Other Pacific Islander	N	N	N
Some other race	N	N	N
Two or more races	+/-1.1	2.0%	+/-1.4
Hispanic or Latino origin (of any race)	+/-0.6	0.6%	+/-0.8
White alone, not Hispanic or Latino origin	+/-1.9	74.0%	+/-6.4
NATIVITY AND CITIZENSHIP STATUS			
Native	+/-1.5	93.0%	+/-3.8
Foreign born	+/-1.5	7.0%	+/-3.8
Naturalized U.S. citizen	+/-1.0	1.4%	+/-1.6
Not a U.S. citizen	+/-1.1	5.7%	+/-3.8
LANGUAGE SPOKEN AT HOME AND ABILITY TO SPEAK ENGLISH			
Speak language other than English	+/-1.8	11.8%	+/-4.9
Speak English "very well"	+/-1.6	7.3%	+/-2.9
Speak English less than "very well"	+/-0.5	4.6%	+/-3.4
EARNINGS IN THE PAST 12 MONTHS (IN 2012 INFLATION-ADJUSTED DOLLARS) FOR WORKERS			
Workers 16 years and over with earnings	+/-462	2,120	+/-275
$1 to $9,999 or loss	+/-3.0	34.7%	+/-6.9
$10,000 to $14,999	+/-2.2	17.3%	+/-6.1
$15,000 to $24,999	+/-2.6	20.1%	+/-5.7
$25,000 to $34,999	+/-2.7	12.5%	+/-5.2
$35,000 to $49,999	+/-2.7	8.4%	+/-3.4
$50,000 to $64,999	+/-2.4	4.2%	+/-2.3
$65,000 to $74,999	+/-1.3	1.4%	+/-1.4
$75,000 or more	+/-2.0	1.5%	+/-1.5
Median earnings (dollars)	+/-2,680	14,578	+/-1,782
POVERTY STATUS IN THE PAST 12 MONTHS			
Workers 16 years and over for whom poverty status is determined	+/-453	2,106	+/-276
Below 100 percent of the poverty level	+/-2.1	31.0%	+/-6.9
100 to 149 percent of the poverty level	+/-2.1	12.1%	+/-4.8

Subject	Duluth city, Minnesota		
	Car, truck, or van -- carpooled	Public transportation (excluding taxicab)	
	Margin of Error	Estimate	Margin of Error
At or above 150 percent of the poverty level	+/-2.9	56.9%	+/-7.0
Workers 16 years and over	+/-462	2,120	+/-275
OCCUPATION			
Management, business, science, and arts occupations	+/-3.6	24.9%	+/-5.4
Service occupations	+/-3.9	30.9%	+/-6.2
Sales and office occupations	+/-3.0	25.9%	+/-4.8
Natural resources, construction, and maintenance occupations	+/-2.0	4.4%	+/-3.3
Production, transportation, and material moving occupations	+/-2.0	13.8%	+/-3.9
Military specific occupations	+/-0.1	0.0%	+/-1.5
INDUSTRY			
Agriculture, forestry, fishing and hunting, and mining	+/-1.0	0.0%	+/-1.5
Construction	+/-2.0	0.8%	+/-1.2
Manufacturing	+/-1.5	7.4%	+/-3.3
Wholesale trade	+/-0.8	0.4%	+/-0.7
Retail trade	+/-1.8	17.7%	+/-5.2
Transportation and warehousing, and utilities	+/-0.9	1.7%	+/-1.4
Information and finance and insurance, and real estate and rental and leasing	+/-2.2	5.0%	+/-2.4
Professional, scientific, and management, and administrative and waste management services	+/-1.8	7.5%	+/-3.9
Educational services, and health care and social assistance	+/-3.8	37.8%	+/-5.9
Arts, entertainment, and recreation, and accommodation and food services	+/-3.7	17.1%	+/-4.8
Other services (except public administration)	+/-1.8	2.0%	+/-1.5
Public administration	+/-1.4	2.4%	+/-1.6
Armed forces	+/-0.1	0.0%	+/-1.5
CLASS OF WORKER			
Private wage and salary workers	+/-2.9	82.8%	+/-4.8
Government workers	+/-2.8	16.3%	+/-4.8
Self-employed workers in own not incorporated business	+/-1.2	0.8%	+/-0.9
Unpaid family workers	+/-0.4	0.0%	+/-1.5
Workers 16 years and over who did not work at home	+/-462	2,120	+/-275
TIME ARRIVING AT WORK FROM HOME			
12:00 a.m. to 4:59 a.m.	+/-0.9	1.6%	+/-2.5
5:00 a.m. to 5:29 a.m.	+/-1.3	0.8%	+/-1.0
5:30 a.m. to 5:59 a.m.	+/-1.5	0.2%	+/-0.3
6:00 a.m. to 6:29 a.m.	+/-1.8	0.3%	+/-0.5
6:30 a.m. to 6:59 a.m.	+/-2.5	8.1%	+/-3.5
7:00 a.m. to 7:29 a.m.	+/-2.3	10.5%	+/-4.1
7:30 a.m. to 7:59 a.m.	+/-3.4	12.2%	+/-3.5
8:00 a.m. to 8:29 a.m.	+/-2.8	9.0%	+/-3.5
8:30 a.m. to 8:59 a.m.	+/-1.5	12.2%	+/-5.5
9:00 a.m. to 11:59 p.m.	+/-3.3	45.2%	+/-7.3
TRAVEL TIME TO WORK			
Less than 10 minutes	+/-2.8	7.3%	+/-4.0
10 to 14 minutes	+/-3.0	13.4%	+/-4.6
15 to 19 minutes	+/-3.5	8.7%	+/-2.9
20 to 24 minutes	+/-2.9	23.3%	+/-6.4
25 to 29 minutes	+/-2.3	5.9%	+/-3.1
30 to 34 minutes	+/-2.2	14.1%	+/-4.5

Subject	Duluth city, Minnesota		
	Car, truck, or van -- carpooled	Public transportation (excluding taxicab)	
	Margin of Error	Estimate	Margin of Error
35 to 44 minutes	+/-1.3	7.9%	+/-3.8
45 to 59 minutes	+/-1.5	9.3%	+/-3.5
60 or more minutes	+/-1.4	10.0%	+/-4.1
Mean travel time to work (minutes)	N	N	N
Workers 16 years and over in households	+/-449	2,038	+/-271
HOUSING TENURE			
Owner-occupied housing units	+/-3.3	36.3%	+/-6.4
Renter-occupied housing units	+/-3.3	63.7%	+/-6.4
VEHICLES AVAILABLE			
No vehicle available	+/-1.1	36.3%	+/-8.3
1 vehicle available	+/-4.1	28.9%	+/-7.0
2 vehicles available	+/-4.4	19.5%	+/-6.2
3 or more vehicles available	+/-4.1	15.4%	+/-4.5
PERCENT IMPUTED			
Means of transportation to work	(X)	(X)	(X)
Time arriving at work from home	(X)	(X)	(X)
Travel time to work	(X)	(X)	(X)
Vehicles available	(X)	(X)	(X)

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

Foreign born excludes people born outside the United States to a parent who is a U.S. citizen.

Workers include members of the Armed Forces and civilians who were at work last week.

Industry codes are 4-digit codes and are based on the North American Industry Classification System 2007. The Industry categories adhere to the guidelines issued in Clarification Memorandum No. 2, "NAICS Alternate Aggregation Structure for Use By U.S. Statistical Agencies," issued by the Office of Management and Budget.

While the 2008-2012 American Community Survey (ACS) data generally reflect the December 2009 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2000 data. Boundaries for urban areas have not been updated since Census 2000. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2008-2012 American Community Survey

Explanation of Symbols:

1. An '**' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '***' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '*****' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is

not appropriate.

7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.

8. An '(X)' means that the estimate is not applicable or not available.

S1701

POVERTY STATUS IN THE PAST 12 MONTHS

2008-2012 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Subject	Minnesota				
	Total		Below poverty level		Percent below poverty level
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate
Population for whom poverty status is determined	5,191,097	+/-878	582,335	+/-6,758	11.2%
AGE					
Under 18 years	1,263,116	+/-934	180,377	+/-4,007	14.3%
Related children under 18 years	1,256,333	+/-1,070	173,970	+/-3,930	13.8%
18 to 64 years	3,269,191	+/-682	347,303	+/-3,867	10.6%
65 years and over	658,790	+/-493	54,655	+/-1,251	8.3%
SEX					
Male	2,575,664	+/-1,371	266,439	+/-3,979	10.3%
Female	2,615,433	+/-1,336	315,896	+/-4,255	12.1%
RACE AND HISPANIC OR LATINO ORIGIN					
One race	5,070,466	+/-3,835	555,956	+/-6,592	11.0%
White	4,472,883	+/-3,326	390,751	+/-5,305	8.7%
Black or African American	260,330	+/-2,377	91,455	+/-3,370	35.1%
American Indian and Alaska Native	53,714	+/-1,161	20,427	+/-1,217	38.0%
Asian	211,619	+/-1,401	36,092	+/-2,170	17.1%
Native Hawaiian and Other Pacific Islander	2,054	+/-372	264	+/-109	12.9%
Some other race	69,866	+/-3,231	16,967	+/-1,793	24.3%
Two or more races	120,631	+/-3,632	26,379	+/-1,623	21.9%
Hispanic or Latino origin (of any race)	244,056	+/-471	60,938	+/-2,636	25.0%
White alone, not Hispanic or Latino	4,316,511	+/-1,415	351,902	+/-4,727	8.2%
EDUCATIONAL ATTAINMENT					
Population 25 years and over	3,475,275	+/-858	288,792	+/-3,344	8.3%
Less than high school graduate	272,488	+/-3,323	69,839	+/-1,894	25.6%
High school graduate (includes equivalency)	935,482	+/-5,605	98,593	+/-1,853	10.5%
Some college, associate's degree	1,135,898	+/-5,203	86,030	+/-1,951	7.6%
Bachelor's degree or higher	1,131,407	+/-6,855	34,330	+/-1,245	3.0%
EMPLOYMENT STATUS					
Civilian labor force 16 years and over	2,923,780	+/-4,231	213,995	+/-3,031	7.3%
Employed	2,721,108	+/-5,154	158,509	+/-2,523	5.8%
Male	1,406,182	+/-3,485	69,195	+/-1,635	4.9%

Subject	Minnesota				
	Total		Below poverty level		Percent below poverty level
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate
Female	1,314,926	+/-3,742	89,314	+/-1,826	6.8%
Unemployed	202,672	+/-2,865	55,486	+/-1,765	27.4%
Male	120,264	+/-2,073	30,282	+/-1,215	25.2%
Female	82,408	+/-1,911	25,204	+/-1,301	30.6%
WORK EXPERIENCE					
Population 16 years and over	4,073,913	+/-1,314	420,935	+/-4,203	10.3%
Worked full-time, year-round in the past 12 months	1,829,319	+/-5,815	33,754	+/-1,165	1.8%
Worked part-time or part-year in the past 12 months	1,198,062	+/-5,645	182,686	+/-2,868	15.2%
Did not work	1,046,532	+/-4,747	204,495	+/-3,090	19.5%
All Individuals below:					
50 percent of poverty level	251,818	+/-4,656	(X)	(X)	(X)
125 percent of poverty level	776,679	+/-8,608	(X)	(X)	(X)
150 percent of poverty level	976,206	+/-10,006	(X)	(X)	(X)
185 percent of poverty level	1,263,908	+/-11,116	(X)	(X)	(X)
200 percent of poverty level	1,383,760	+/-11,459	(X)	(X)	(X)
Unrelated individuals for whom poverty status is determined	1,047,107	+/-7,033	245,560	+/-3,191	23.5%
Male	518,418	+/-4,801	116,974	+/-2,267	22.6%
Female	528,689	+/-3,704	128,586	+/-2,267	24.3%
Mean income deficit for unrelated individuals (dollars)	5,923	+/-46	(X)	(X)	(X)
Worked full-time, year-round in the past 12 months	444,466	+/-5,548	12,357	+/-753	2.8%
Worked less than full-time, year-round in the past 12 months	297,424	+/-4,025	113,855	+/-2,458	38.3%
Did not work	305,217	+/-2,857	119,348	+/-2,194	39.1%
PERCENT IMPUTED					
Poverty status for individuals	21.0%	(X)	(X)	(X)	(X)

Subject	Minnesota	Duluth city, Minnesota			
	Percent below poverty level	Total		Below poverty level	
	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	+/-0.1	80,481	+/-585	17,591	+/-1,059
AGE					
Under 18 years	+/-0.3	15,647	+/-509	3,993	+/-549
Related children under 18 years	+/-0.3	15,528	+/-505	3,874	+/-558
18 to 64 years	+/-0.1	53,724	+/-754	12,619	+/-727
65 years and over	+/-0.2	11,110	+/-347	979	+/-178
SEX					
Male	+/-0.2	39,545	+/-588	8,170	+/-619
Female	+/-0.2	40,936	+/-674	9,421	+/-764
RACE AND HISPANIC OR LATINO ORIGIN					
One race	+/-0.1	78,324	+/-649	16,615	+/-1,046
White	+/-0.1	73,165	+/-719	13,793	+/-935
Black or African American	+/-1.2	1,776	+/-310	1,118	+/-291
American Indian and Alaska Native	+/-2.0	1,854	+/-376	1,254	+/-380
Asian	+/-1.0	1,187	+/-201	407	+/-118
Native Hawaiian and Other Pacific Islander	+/-5.5	21	+/-28	0	+/-20
Some other race	+/-2.2	321	+/-196	43	+/-41
Two or more races	+/-1.2	2,157	+/-336	976	+/-295
Hispanic or Latino origin (of any race)	+/-1.1	1,029	+/-235	206	+/-108
White alone, not Hispanic or Latino	+/-0.1	72,632	+/-712	13,758	+/-936
EDUCATIONAL ATTAINMENT					
Population 25 years and over	+/-0.1	51,389	+/-663	6,910	+/-416
Less than high school graduate	+/-0.6	3,290	+/-352	991	+/-182
High school graduate (includes equivalency)	+/-0.2	13,501	+/-562	2,467	+/-298
Some college, associate's degree	+/-0.2	17,875	+/-696	2,550	+/-296
Bachelor's degree or higher	+/-0.1	16,723	+/-622	902	+/-190
EMPLOYMENT STATUS					
Civilian labor force 16 years and over	+/-0.1	45,070	+/-853	7,836	+/-561
Employed	+/-0.1	41,419	+/-854	6,045	+/-517
Male	+/-0.1	20,511	+/-542	2,514	+/-331
Female	+/-0.1	20,908	+/-541	3,531	+/-407
Unemployed	+/-0.7	3,651	+/-377	1,791	+/-281
Male	+/-0.8	2,223	+/-288	952	+/-207
Female	+/-1.2	1,428	+/-236	839	+/-193
WORK EXPERIENCE					
Population 16 years and over	+/-0.1	66,864	+/-691	14,039	+/-774
Worked full-time, year-round in the past 12 months	+/-0.1	24,340	+/-705	958	+/-191
Worked part-time or part-year in the past 12 months	+/-0.2	23,653	+/-899	7,892	+/-681
Did not work	+/-0.3	18,871	+/-697	5,189	+/-481
All Individuals below:					
50 percent of poverty level	(X)	8,354	+/-808	(X)	(X)
125 percent of poverty level	(X)	21,353	+/-1,090	(X)	(X)
150 percent of poverty level	(X)	24,975	+/-1,074	(X)	(X)
185 percent of poverty level	(X)	30,626	+/-1,110	(X)	(X)
200 percent of poverty level	(X)	32,651	+/-1,074	(X)	(X)
Unrelated individuals for whom poverty status is determined	+/-0.3	25,971	+/-933	10,229	+/-725
Male	+/-0.4	13,174	+/-674	5,389	+/-575
Female	+/-0.4	12,797	+/-710	4,840	+/-504

Subject	Minnesota	Duluth city, Minnesota			
	Percent below poverty level	Total		Below poverty level	
	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Mean income deficit for unrelated individuals (dollars)	(X)	6,070	+/-213	(X)	(X)
Worked full-time, year-round in the past 12 months	+/-0.2	7,435	+/-595	516	+/-154
Worked less than full-time, year-round in the past 12 months	+/-0.6	10,937	+/-752	6,120	+/-665
Did not work	+/-0.6	7,599	+/-553	3,593	+/-395
PERCENT IMPUTED					
Poverty status for individuals	(X)	27.6%	(X)	(X)	(X)

Subject	Duluth city, Minnesota	
	Percent below poverty level	
	Estimate	Margin of Error
Population for whom poverty status is determined	21.9%	+/-1.3
AGE		
Under 18 years	25.5%	+/-3.1
Related children under 18 years	24.9%	+/-3.2
18 to 64 years	23.5%	+/-1.3
65 years and over	8.8%	+/-1.6
SEX		
Male	20.7%	+/-1.5
Female	23.0%	+/-1.7
RACE AND HISPANIC OR LATINO ORIGIN		
One race	21.2%	+/-1.3
White	18.9%	+/-1.3
Black or African American	63.0%	+/-10.9
American Indian and Alaska Native	67.6%	+/-10.2
Asian	34.3%	+/-9.0
Native Hawaiian and Other Pacific Islander	0.0%	+/-47.5
Some other race	13.4%	+/-15.6
Two or more races	45.2%	+/-9.6
Hispanic or Latino origin (of any race)	20.0%	+/-11.6
White alone, not Hispanic or Latino	18.9%	+/-1.3
EDUCATIONAL ATTAINMENT		
Population 25 years and over	13.4%	+/-0.9
Less than high school graduate	30.1%	+/-4.5
High school graduate (includes equivalency)	18.3%	+/-2.2
Some college, associate's degree	14.3%	+/-1.6
Bachelor's degree or higher	5.4%	+/-1.1
EMPLOYMENT STATUS		
Civilian labor force 16 years and over	17.4%	+/-1.2
Employed	14.6%	+/-1.2
Male	12.3%	+/-1.6
Female	16.9%	+/-1.9
Unemployed	49.1%	+/-5.3
Male	42.8%	+/-6.8
Female	58.8%	+/-8.2
WORK EXPERIENCE		
Population 16 years and over	21.0%	+/-1.2
Worked full-time, year-round in the past 12 months	3.9%	+/-0.8
Worked part-time or part-year in the past 12 months	33.4%	+/-2.3
Did not work	27.5%	+/-2.2
All Individuals below:		
50 percent of poverty level	(X)	(X)
125 percent of poverty level	(X)	(X)
150 percent of poverty level	(X)	(X)
185 percent of poverty level	(X)	(X)
200 percent of poverty level	(X)	(X)
Unrelated individuals for whom poverty status is determined	39.4%	+/-2.4
Male	40.9%	+/-3.2
Female	37.8%	+/-3.2

Subject	Duluth city, Minnesota	
	Percent below poverty level	
	Estimate	Margin of Error
Mean income deficit for unrelated individuals (dollars)	(X)	(X)
Worked full-time, year-round in the past 12 months	6.9%	+/-2.0
Worked less than full-time, year-round in the past 12 months	56.0%	+/-3.7
Did not work	47.3%	+/-3.2
PERCENT IMPUTED		
Poverty status for individuals	(X)	(X)

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

While the 2008-2012 American Community Survey (ACS) data generally reflect the December 2009 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2000 data. Boundaries for urban areas have not been updated since Census 2000. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2008-2012 American Community Survey

Explanation of Symbols:

1. An '**' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '***' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '*****' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.

Written Standards for Provision of ESG Assistance
In the City of Duluth

1. **Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG**

   a. The City of Duluth does not prioritize who is assisted through the ESG program. Clients are served as received.

   b. Per 24 CFR 576.401: ESG sub-recipients must conduct an initial evaluation to determine each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. All ESG sub-recipients will follow federal documentation guidelines to establish the client's status as homeless or at-risk of homeless and their income eligibility. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under §576.400(d).

      i. The City of Duluth is currently working with the St. Louis County Continuum of Care (CoC) to develop common intake and assessment tools and protocols to be used by all agencies that receive ESG, CoC and other homeless program funding within the Continuum. The tools and protocols will create consistency in client intake and assessment and provide basis for appropriate agency referral and to develop targeting and prioritization protocols.

      ii. ESG sub-recipients must re-evaluate program participant's eligibility and the types and amounts of assistance the participant needs;

         1. Not less than once every 3 months for participants who are receiving homelessness prevention assistance, and
         2. Not less than once annually for participants who are receiving rapid re-housing assistance.

      iii. Re-evaluation of program participants may be conducted more frequently than required by 24 CFR 576.401 and may be incorporated into the case management process which must occur not less than monthly for homeless prevention and rapid re-housing participants – See 24 CFR 576.401(e) (i). Regardless of which timeframe is used, re-evaluations, must at minimum, establish that:

         1. The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and the program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance. To determine if an individual or family is income eligible, the sub-recipient must examine an individual or family's annual income to ensure that it does not exceed the most current HUD income limits applicable to the City of Duluth. Note: Annual income must be below 30% at the time of the initial evaluation.

         2. When the program participant's income or other circumstances change, such as change in household composition, that affects the program participant's need for assistance under ESG, the sub-recipient must then re-evaluate the program

participant's eligibility and the amount and types of assistance the program participant needs.

iv. Sub-recipients must assist each program participant, as needed, to obtain appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; housing stability case management; and other Federal, State, local, or private assistance available to assist the program participant in obtaining housing stability including:

1. Medicaid
2. Supplemental Nutrition Assistance Program
3. Women, Infants and Children (WIC)
4. Federal-State Unemployment Insurance Program
5. Social Security Disability Insurance (SSDI)
6. Supplemental Security Income (SSI)
7. Child and Adult Care Food Program,
8. Minnesota Family Investment Program (MFIP),
9. General Assistance Program (GA), and
10. Other mainstream resources such as housing, health, social services, employment, education services and youth programs that an individual or family may be eligible to receive

2. Standards for targeting and providing essential services related to street outreach

a. The City of Duluth does not target ESG funding to any geographic area or client population. ESG sub-recipients are selected through a request for proposal process based on service provision. No duplication of service by sub-recipients is anticipated in the Duluth area of operation.

b. ESG funding may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term ''unsheltered homeless people'' means individuals and families who qualify as homeless under paragraph (1) (i) of the ''homeless'' definition under 24 CFR Part 576.2. As outlined in 24 CFR Part 576.101, essential services consist of:

i. Engagement;
ii. Case management;
iii. Emergency health services – only when other appropriate health services are inaccessible or unavailable within the area;
iv. Emergency mental health services – only when other appropriate mental health services are inaccessible or unavailable within the area;
v. Transportation; and
vi. Services for special populations.

c. ESG sub-recipients must determine an individual's or family's vulnerability and unwillingness or inability to access emergency shelter, housing, or an appropriate health facility, prior to providing essential services under this component to ensure that ESG funding is used to assist those with the greatest need for street outreach assistance.

3. **Policies and procedures for admission, diversion, referral, and discharge by emergency shelters**

a. Emergency Shelter Definition
The term Emergency Shelter was revised by 24 CFR Part 576.2 to mean "any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. This definition excludes transitional housing. However, projects that were funded as an emergency shelter (shelter operations) under the FY 2010 Emergency Shelter Grants program may continue to be funded under the emergency shelter component under the Emergency Solutions Grants program, regardless of whether the project meets the revised definition.

b. Admission, Diversion, Referral and Discharge
Shelter stays should be avoided, if possible, and when not possible, limited to the shortest time necessary to help participants regain permanent housing. Consistent with Section (a) of this document, ESG sub-recipients must conduct an initial evaluation of all individuals or families to determine if they should be admitted to an emergency shelter, diverted to a provider of other ESG-funded components, such as rapid re-housing or homeless prevention assistance, or referred for other mainstream resources.

c. ESG sub-recipients must determine that individuals and families meet category (1), (2), (3), or (4) of the Homeless Definitions listed below and rate the individual's or family's vulnerability to ensure that only those individuals or families that have the greatest need for emergency shelter assistance receive ESG funded assistance.

   i. Category 1 – Literally Homeless
   ii. Category 2 – Imminent Risk of Homeless
   iii. Category 3 – Homeless Under Other Federal Statutes
   iv. Category 4 – Fleeing/Attempting to Flee DV

d. ESG sub-recipients must also reassess emergency shelter participants, on an ongoing basis, to determine the earliest possible time that they can be discharged to permanent housing. All persons discharged from emergency shelters will have their exit status entered into either HMIS and will be provided discharge paperwork as applicable or upon request.

e. Safety and Shelter Needs of Special Populations

   i. ESG funding may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under the regulations for the emergency shelter component found at 24 CFR Part 576.102.

ii. Consistent with ESG recordkeeping and reporting requirements found at 24 CFR Part 576.500, ESG sub-recipients must develop and apply written policies to ensure the safety of program participants through the following actions:

1. All grantees and sub-grantees will take appropriate measures to provide for client confidentiality. Grantees and sub-grantees will develop and implement procedures to guarantee the confidentiality of records concerning program participants. All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and receives ESG assistance will be kept secure and confidential.

2. The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter, and

3. The address or location of any housing of a program participant, including youth, individuals living with HIV/AIDS, victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing will not be made public, except as provided under a preexisting privacy policy of the sub-recipient and consistent with state and local laws regarding privacy and obligations of confidentiality

iii. In addition, ESG sub-recipients must adhere to the following ESG shelter and housing standards found at 24 CFR Part 576.403 to ensure that shelter and housing facilities are safe, sanitary, and adequately maintained:

1. Lead-Based Paint Requirements. The Lead-Based Paint Poisoning Prevention Act applies to all shelters assisted under ESG program and all housing occupied by program participants. All ESG sub-recipients are required to conduct a Lead-Based Paint inspection on all units receiving assistance under the rapid re-housing AND homelessness prevention components if the unit was built before 1978 and a child under age of six or a pregnant woman resides in the unit.
2. Structure and Materials. The shelter building should be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents.
3. Access. The shelter must be accessible, and there should be a second means of exiting the facility in the case of emergency or fire.
4. Space and Security. Each resident should have adequate space and security for themselves and their belongings. Each resident must have an acceptable place to sleep.
5. Interior Air Quality. Each room or space within the shelter/facility must have a natural or mechanical means of ventilation. The interior air should be free of pollutants at a level that might threaten or harm the health of residents.
6. Water Supply. The shelter's water supply should be free of contamination.

7. Sanitary Facilities. Each resident should have access to sanitary facilities that are in proper operating condition. These facilities should be able to be used in privacy, and be adequate for personal cleanliness and the disposal of human waste.
8. Thermal Environment. The shelter/facility must have any necessary heating/cooling facilities in proper operating condition.
9. Illumination and Electricity. The shelter/facility should have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There should be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
10. Food Preparation. Food preparation areas, if any, should contain suitable space and equipment to store, prepare and serve food in a safe and sanitary manner.
11. Sanitary Conditions. The shelter should be maintained in a sanitary condition.
12. Fire Safety-Sleeping Areas. There should be at least one working smoke detector in each occupied unit of the shelter facility. In addition, smoke detectors should be located near sleeping areas where possible. The fire alarm system should be designed for a hearing-impaired resident.
13. Fire Safety-Common Areas. All public areas of the shelter must have at least one working smoke detector.

4. **Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter**

   a. ESG providers and the City of Duluth, Community Development staff are currently working with the St. Louis County CoC to develop common intake and assessment tools and protocols to be used by all agencies that receive ESG, CoC and other homeless program funding within the Continuum. The tools and protocols will create consistency in client intake and assessment and provide basis for appropriate agency referral and to develop targeting and prioritization protocols.

   b. Upon completion of the common intake and assessment tools and protocols, all ESG sub-recipients will use that system to help determine the individual or family need for emergency shelter or other ESG-funded assistance.

   c. ESG funding may be used to provide essential services to individuals and families who are in an emergency shelter. Essential services for participants of emergency shelter assistance can include case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.

   d. ESG sub-recipients are responsible to assess an individual or family's initial need for emergency shelter and must re-assess their need on an ongoing basis to ensure that only those individuals or families with the greatest need receive ESG-funded emergency shelter assistance. Shelters that serve families must serve all eligible families and may not refuse services based on the age of children or the size of the family.

e. Client re-assessment will take place at the participant level and at the service provider level. Clients meet with case managers throughout their participation in the program, and have regular progress evaluations. Clients have opportunity to provide feedback and assessment about programs and services as well.

f. The City of Duluth is working with the St. Louis County CoC to develop criteria and protocols for system-wide program and service evaluation and improvement to be implemented through the Heading Home St. Louis County Leadership Council—the governing group for the St. Louis County Continuum—and the Affordable Housing Coalition's Homeless Response Committee, which is comprised of all the homeless housing and service providers in Duluth and serves as one of the working groups for the HHSLC Leadership Council. Case managers and administrative staff from all of the homeless housing and service organizations, along with City and County staff participate in the Homeless Response Committee meetings as this is the forum for discussion and implementation of system related protocols, activities, best practices, evaluation and changes that occur.

5. **Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers**

   a. Coordination to assist the homeless and prevent homelessness comes through collaboration among housing and service providers within the City of Duluth and the St. Louis County CoC, the Homeless Response Committee and Affordable Housing Coalition, the Heading Home Leadership Council, St. Louis County and City of Duluth Community Development staff and St. Louis County Health and Human Services staff. Active engagement in the Continuum of Care through the Homeless Response Committee, the Affordable Housing Coalition, and the HHSLC Leadership Council is strongly encouraged.

6. **Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance**

   a. ESG-funded agencies will be responsible for ensuring that potential participants are served, with provisions for targeting some services to eligible households who meet prioritization criteria established through the Continuum of Care using coordinated assessment protocols.

   b. A key component to successful implementation of a coordinated assessment system within the St. Louis County CoC is a common screening and assessment process developed through the CoC. Screening and assessment thoroughly explores a family's or individual's situation and pinpoints their unique housing and service needs. Based upon the assessment, families and individuals should be referred to the kinds of housing and services most appropriate to their situations and need.

   c. The common assessment tool aids matching individuals and families with the most appropriate assistance. Under homelessness prevention, ESG assistance is available to individuals and families below 30% of Area Median Income (AMI), and are homeless or at risk of becoming homeless.

d. ESG funds can be used to prevent an individual or family from becoming homeless and regain stability in current housing or other permanent housing. Rapid re-housing funds can be used to assist individuals and families who are literally homeless progress toward permanent housing and achieve housing stability.
   i. Homeless Prevention Households will be re-certified for continued eligibility every 3 months.
   ii. Rapid Re-Housing Households will be re-certified annually.

7. **Standards for determining the share of rent and utility costs that program participants must pay, if any, while receiving homelessness prevention or rapid re-housing assistance**

   a. Standards for both homelessness prevention and rapid re-housing for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following:
      i. Clients receiving rental assistance are expected to contribute 30% of their income toward the unit's rent. The City of Duluth ESG Program does not require a minimum client contribution.
      ii. Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the current Fair Market Rent limit, established by HUD.
      iii. The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units. See 24 CFR 574.320.
      iv. The rental unit must meet minimum habitability standards found at 24 CFR 576.403.
      v. There must be a rental assistance agreement and lease between the property manager and tenant as well as the owner of property and ESG sub-recipient.
      vi. No rental assistance may be made to an individual or family that is receiving rental assistance from another public source for the same time period.
      vii. Rental assistance may not be provided to a participant who is currently receiving replacement housing payments under Uniform Relocation Assistance

   b. Per 24 CFR 576.106 (e), ESG sub-recipients may make rental assistance payments only to an owner with whom the sub-recipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the sub-recipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.

8. **Standards for determining how long a particular program participant will receive rental assistance and whether and how the amount of that assistance will be adjusted over time**

   a. Subject to the general conditions under 24 CFR 576.103 and 24 CFR Part 576.104, ESG sub-recipients may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

i. Short-term rental assistance is assistance for up to 3 months of rent.
ii. Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent.
iii. Payment of rental arrears may consist of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

b. The maximum amount of rental assistance provided, and an individual or family's level of responsibility for rent payments, over time, shall be determined by the ESG sub-recipient and shall be reflective of the individual or family's need for rental assistance and the level of financial resources available to the ESG sub-recipient.

c. Rental assistance will end if and when other subsidy begins, such as Section 8 Housing Choice Voucher, public housing, or project based rental subsidy.

d. Guidance from the St. Louis County CoC, through Homeless Response Committees, Affordable Housing and Rural Housing Coalition meetings and through the Heading Home SLC Leadership Council, will establish, evaluate and modify rental assistance parameters based on data such as community need, outcomes and available funding within the HUD guidelines.

9. **Standards for determining the type, amount, and duration of housing stabilization and relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance**

a. Subject to the general conditions under 24 CFR 576.103 and 24 CFR Part 576.104, sub-recipients may use ESG funding to pay housing owners, utility companies, and other third parties for some or all of the following costs, as allowed under 24 CFR 576.105:

i. Rental application fees
ii. Security deposits
iii. Last month's rent
iv. Utility deposits
v. Utility payments
vi. Moving costs, and
vii. Some limited services costs

b. Consistent with 24 CFR 576.105 (c), ESG sub-recipients determine the type, maximum amount and duration of housing stabilization and relocation services for individuals and families who are in need of homeless prevention or rapid re-housing assistance through the initial evaluation, re-evaluation and ongoing case management processes.

c. Consistent with 24 CFR 576.105(d), financial assistance for housing stabilization and relocation services cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA) during the period of time covered by the URA payments.

CITY OF DULUTH (City)
HOME PROGRAM HOMEOWNERSHIP ASSISTANCE,
HOMEBUYER ASSISTANCE, AND
RESALE GUIDELINES

REVISED December 2013

Definitions:

The following applies to all homebuyers or homeowners of HOME funded housing.

1. Eligible Households: Homebuyers and homeowners must be low-income households defined as households whose income is more than thirty (30%) of the area median income, but does not exceed eighty percent (80%) of the area median income, adjusted for family size, as determined from time to time, by the United States Department of Housing and Urban Development (HUD).

2. Principal Residence: Homeowners and homebuyers must occupy the property as a principal residence for the duration of the affordability period.

3. Affordable Housing: Affordable housing means that the principal, interest, property taxes and insurance (PITI) may not exceed 30% of the gross income of a family with an income that is 80% or less of the median income for the area, adjusted for family size.

4. Level of Subsidy: The minimum HOME investment in affordable housing will be no less than $1,000 per-unit. The maximum per-unit subsidy will not exceed the per-unit dollar limitations established under section 221(d)(3)(ii) of the National Housing Act for elevator-type projects that apply to the Duluth area. Organizations conducting homeownership assistance.

5. Subsidy Type: HOME program assistance will be used to acquire and rehabilitate existing housing units for sale to eligible homebuyers, or to construction new homes for sale to eligible homebuyers. HOME assistance will be in the form of a grant.

6. Qualified Capital Improvements: Qualified Capital Improvements means those certain improvements made at the homeowner's expense which add significant value to the property and which are capital in nature. Improvements which would qualify as Qualified Capital Improvements include, without limitation: the construction of additions, rooms, garages, bathrooms and kitchen remodeling. However, expenditures for maintenance, such as roof replacement, and the updating or replacement of appliances such as furnaces, water heaters and kitchen appliances, would not qualify as Qualified Capital Improvements.

7. Fair Return on Investment: Should the homeowner decide to sell the HOME assisted property during the affordability period, the homeowner is entitled to a Fair Return on their investment. The amount of the Fair Return will be calculated as 100% of the amount of principle the homeowner has paid down on the current mortgage; plus 25% of the amount of the increase in value of the property since purchase; plus 100% of the value of the qualified capital improvements, if any. Increase in value will be determined by the difference between the appraised value at the time the homeowner purchased the property, and an appraised value at the time the property is listed for sale. If the appraised value has decreased below the original purchase value that portion of the calculation will be zero.

8. Affordable Sale Price: Affordable Sale Price is defined as no more than the actual 95% of median sales price for the City of Duluth for the type of home being purchased. As circumstances warrant, and organization may set a sales price at less than 95% of median sales price.

Eligible Property Types and Forms of Ownership

1. The property can be an existing property or newly constructed.

2. The property can be privately or publicly held prior to sale to the homebuyer.

3. An eligible property may include: a single-family property (one unit) to four-unit property, a condominium unit, a manufactured or mobile home, or a cooperative or mutual housing unit.

4. Homeownership means ownership in fee simple title, a 99-year leasehold interest, ownership in a cooperative or mutual housing unit, or an equivalent form of ownership approved by HUD.

Period of Affordability

The period of affordability will be determined on the total amount of HOME funds invested in the housing, including any HOME program income. The required minimum affordability periods are as follows:

HOME Assistance Per Unit	Minimum Period of Affordability
Under $15,000	5 Years
$15,000 to $40,000	10 Years
Over $40,000	15 Years

Property Standards

1. Any property acquired under the HOME Program Homeownership Assistance program must meet all applicable State and local housing quality standards and code requirements, including the written rehab standards incorporated into the "City of Duluth Housing Code Chapter 29A as amended by Ordinance 9462". All properties built prior to 1978 must be assessed for the presence of lead-based paint, and lead hazards must be remediated.

2. Any property acquired where rehabilitation is needed at the time of initial occupancy must be free from all noted health and safety defects before occupancy and not later than 6 months after the transfer of ownership to the buyer being assisted. The housing must meet the property standards, indicated in number 1. above, not later than 2 years after the transfer of the ownership interest.

Property Value At Time of Initial Purchase and After Rehabilitation

1. Properties will require an appraisal to determine value.

2. Appraised value (not purchase price) of HOME-assisted property to be acquired must not exceed the actual 95% of median sales price for the City of Duluth for the type of home being purchased. If the HOME-assisted property is also a Community Land Trust property, the value of the land may be excluded from the total value to determine the value of the property being acquired by the homebuyer.

3. If rehabilitation is required, the appraised property value after rehabilitation cannot exceed the actual 95% of median sales price. An after-rehabilitation value estimate must be completed prior to investment of HOME funds.

Enforcement of the Period of Affordability

The City of Duluth HOME written agreement with organizations will state the resale requirement will be utilized in accordance with this policy. Resale requirements will also be stated in the "Agreement Between the Participating Jurisdiction *(PJ)* and the Homebuyer" and signed by the homebuyer prior to purchase, in the form of which is attached. At a minimum, this Agreement states the amount of HOME subsidy, the period of affordability, the terms of occupancy required as principal residence, and the restriction of the property's sale to only HOME income eligible buyers during the period of affordability.

Resale will be utilized for those projects with significant long-term affordability requirements where the organization and homebuyer have an ongoing relationship after the original sale of the HOME assisted unit. This relationship can be in the form of the organization retaining ownership of the underlying land (as in the land trust model) or if the organization is the entity that holds and services the homebuyer's principal mortgage loan. Organizations will be responsible to assist the homeowner in the resale of the property to ensure compliance with HOME regulations.

In the event of a possible foreclosure of a HOME assisted property, the City may use purchase option, rights of first refusal or other preemptive rights to purchase the housing before foreclosure to preserve affordability. For each home sold, organizations are required to file with the St. Louis County Recorder of Deeds a request for notice of foreclosure naming the City's Community Development Division as the party to be notified.

A restrictive covenant will be used to ensure compliance with the resale requirement, in the form of which is attached. The restrictive covenant will be filed with the St. Louis County Recorder of Deeds and the requirements within shall be triggered upon sale or transfer of property records.

Guidelines for Resale

1. If the HOME assisted housing is transferred, voluntarily or otherwise during the period of affordability, there will be a resale restriction to ensure long-term affordability. The property must be made available for subsequent purchase only to a buyer that is an Eligible Household, and that buyer will occupy the property as their principal residence.

2. Properties must be affordable to the first purchaser and all subsequent purchasers for the term of affordability. Affordability means that the principal, interest, property taxes and insurance (PITI) may not exceed 30% of the gross income of a family with an annual income that is more than 30%, but less than 80% of the median income for the area, adjusted for family size.

3. If the property is sold within the affordability period, the subsequent purchaser must also be an income eligible household that will occupy the property as its principal residence. And, should the property be sold within the second half of the affordability period, the City has the option to require an additional five year affordability period for the property.

4. If the property does not continue to be the principal residence of the family for the duration of the affordability period, the housing must be sold at a price consistent with the affordability restriction.

5. Resale provisions are triggered in the event that the house is sold or occupied by other than the new purchaser during the period of affordability. Non-compliance with the residency requirement will require the immediate payback of HOME funds invested in the property unless the house is sold to an eligible household.

6. Upon a resale, the organization must ensure and document that the seller receives a Fair Return on the sale of the property as defined above, including the value of Qualified Capital Improvements.

7. In order for the homeowner to claim consideration of Qualified Capital Improvements as part of the Fair Return at the sale of the property, the homeowner must have obtained the advance approval of the organization that utilized HOME funds to acquire and rehab, or newly construct, the property. Should there be a disagreement between the homeowner and the organization concerning what constitutes a Qualified Capital Improvement or its value, the City of Duluth will make the final determination.

8. If, after the seller receives a Fair Return, the sale price is not affordable to a new Eligible Household, the City may provide additional HOME funds to assist the subsequent buyer. If new HOME funds are provided, the period of affordability will be extended in accordance with HOME regulations.

9. Community Land Trusts (CLT):

   A community land trust acquires land and makes the land available to individual families, cooperatives and others through long-term (99 year) leases. While the leaseholders do not own the land, they may own their buildings or housing units. The CLT, while providing fair equity for the owners of the improvements, maintains affordability at the time of purchase and sale through the leasehold agreement. Where there is a subsidy or loan with the use of HOME funds to a CLT for property acquisition, or to a family (or cooperator if the CLT is in the form of a cooperative), the provisions of the leasehold agreement between the CLT and the occupant must ensure the long-term affordability of the units for the period of affordability both at the time of purchase and resale. Because the leasehold agreement in the CLT model is between the CLT and the homeowner or cooperator, the terms of the leasehold must be determined to be consistent with the qualifications of affordable housing (Sec. 92.254) prior to the provisions of the subsidy. The subsidy may take the form of a loan or grant to the CLT for acquisition of the land (or building in the event of a cooperative) or may be in the form of a loan or grant to the homeowner or cooperator for acquisition and/or rehabilitation of the improvements (building). Where there is a subsidy or loan with the use of HOME funds to a CLT for a purchase/ rehab homeownership project, the CLT will execute a UCC financing statement in favor of the

CLT. Where there is a subsidy or loan with the use of HOME funds to a CLT for a new construction project, the CLT must file a mortgage lien on the properties in favor of the City in the amount of the grants as required by the HOME agreements between the CLT and the City. This process was agreed upon following meetings and discussions between the City of Duluth attorney and the CLT attorney and is stated in the Memo to the Duluth CLT dated August 29, 2002 from the CD Manager and copied to CD staff and the City attorney for CD. The leasehold agreement has also been reviewed and approved by HUD.

Guidelines for Foreclosure

The organization is required to ensure that the City is notified of any possible foreclosure. This shall be accomplished by the organization filing a "Request for Notice of Foreclosure" document on the property in the St. Louis County Recorders Office naming the City of Duluth Community Development Office, 407 City Hall, Duluth, MN 55802, as the party to be notified.

In the event of a possible foreclosure of a first mortgage, the City may use purchase option, rights of first refusal or other preemptive rights to purchase the housing before foreclosure to preserve affordability. However, the affordability restrictions may be terminated in instances of foreclosure, a transfer in lieu of foreclosure, or assignment of an FHA insured mortgage to HUD. The affordability restrictions shall be revived according to the original terms if, during the original affordability period, the owner of record before the termination event, obtains an ownership interest in the property. The restrictive covenant will include the provisions of this paragraph.

Buyer Agreement

The City may delegate in the HOME agreement with the organization the PJ's responsibility for executing the HOME program written agreement with the buyer of the HOME assisted unit. The organization must ensure the "Agreement Between the Participating Jurisdiction and the Homebuyer" is reviewed with the buyer prior to closing on the purchase of the house, and that the buyer understands and agrees to the HOME requirements. The organization must make the sale of the house contingent on the execution of the PJ and Homebuyer agreement. The format of the Agreement is attached.

HOMEBUYER ASSISTANCE AGREEMENT BETWEEN

PARTICIPATING JURISDICITION (CITY OF DULUTH)

AND

HOME PROGRAM ASSISTED HOMEBUYER

(Insert Name of Homebuyer)

THIS AGREEMENT, made and entered into this_____ day of _____, 20__, by and between Participating Jurisdiction (PJ), the City of Duluth, a municipal corporation in St. Louis County, and hereafter referred to as PJ and _____, and hereafter referred to as the Homebuyer.

WHEREAS, the PJ has received U. S. Department of Housing and Urban Development (HUD) funds under the HOME Investment Partnerships Program (HOME) and is desirous of using HOME Program funds to assist qualified households in the purchase of a home; and

WHEREAS, _____*(Agency)*_____ (____) has entered into a contract to administer and provide homebuyer assistance in accordance with the HOME Program Rule 24 CFR 92; and

WHEREAS, the PJ has delegated to *(Agency)* the responsibility for executing this agreement with the buyer of the HOME assisted unit, and *(Agency)* must review this agreement with the Homebuyer at the time the purchase agreement is signed to ensure the Homebuyer understands and agrees to the HOME requirements.

NOW, THEREFORE, in consideration of the mutual covenants and conditions hereinafter contained, the parties hereto agree as follows:

1. Use of HOME Funds

As part of their _____ program, the Agency will use HOME funds to *(develop the housing and/or provide downpayment or closing cost assistance)* which will result in the purchase price of the home being affordable to the Homebuyer. The total amount of HOME Program assistance is $_____, and this subsidy is provided in the form of a *(grant or loan, detail of the financial terms)*.

2. Project Requirements

Single-Family Housing

The HOME-assisted unit must be single-family housing, and must meet the City of Duluth's property maintenance code prior to the Homebuyer occupying the unit.

Property Value and Sale Price

In accordance with HOME Program regulations at 24 CFR 92.254(a)(2)(i), the sales price of the home must not exceed 95% of the median purchase price for Duluth, which is $_____. (*Use this clause for acquisition only of new construction or existing housing)*

- OR -

In accordance with HOME Program regulations at 24 CFR 92.254(a)(2)(ii), the estimated after rehabilitation value of the home must not exceed 95% of the median purchase price for Duluth, which is $_____. *(Use this clause for acquisition with rehabilitation projects)*

Affordability Requirements and the Duration

Based on the amount of the HOME Program subsidy, the length of time that the home must remain affordable to future low-income homebuyers is a period of _____ years, as defined in 24 CFR Part 92.254(a)(4). During this time period, the initial Homebuyer and any subsequent Homebuyers agree to abide by the following restrictions on the sale or transfer of the home:

(*Insert resale restrictions here).*

Principal Residence

The Homebuyer agrees to occupy the HOME-assisted unit as their principal residence, which the Agency will verify at least annually.

Eligible Homebuyer

The Homebuyer qualifies as a low-income family, which means the family's annual income is at least 30 percent, but does not exceed 80 percent of Duluth's median income, as determined by HUD with adjustments for smaller and larger families.

3. Duration of the Agreement

The term of this agreement will end on ___*(date)*_____, 20__, which is _*(affordability period)*_____ years and 30 days after the initial Homebuyer becomes the owner of the HOME-assisted housing unit.

4. Home Purchase Contingent on Agreement

The Homebuyer and Agency understand that the purchase of the HOME-assisted unit is contingent on the execution of this Agreement.

I hereby agree to and understand the HOME Homeownership program requirements as provided to me on this date. The Agency has provided this agreement on behalf of the PJ as specified by the City's contract and in accordance with 24 CFR 92.504(c) (5).

_____ _____

Homebuyer Agency

_____

Homebuyer

DECLARATION OF LAND USE RESTRICTIVE COVENANTS FOR HOME INVESTMENT PARTNERSHIPS PROGRAM

THIS DECLARATION OF LAND USE RESTRICTIVE COVENANTS (this "Agreement"), dated as of _____, by _____, and its successors and assigns (the "Owner") is given as a condition precedent to the awarding of HOME Investment Partnerships Program (the "HOME Program") funds by the City of Duluth, a municipal corporation created and existing under the laws of the State of Minnesota and a designated Participating Jurisdiction under the HOME Program (the "PJ"), together with any successor to its rights, duties and obligations.

WITNESSETH:

WHEREAS, the United States Congress has created the HOME Investment Partnerships Program (catalog of Federal Domestic Assistance Number 14.239) for the furtherance of various housing-related projects throughout the country; and

WHEREAS, the City of Duluth has received an allocation of funding thereunder; and

WHEREAS, the Owner is or shall be the owner of land held within the Northern Communities Land Trust on which an affordable home has been or will be sold to an eligible homebuyer as part of a housing project located in the City of Duluth, County of St. Louis, State of Minnesota, more particularly described in Exhibit B (legal description) hereto (the "Project Land"), known as or to be known as _____ (the "Project"); and

WHEREAS, the PJ is desirous of using a portion of those funds in the amount of $_____ for the Project pursuant to Resolution No. _____, approved _____; and

WHEREAS, the Program requires as a condition precedent to the awarding of the funds that the Owner execute, deliver and record in the official land deed records of St. Louis County this Agreement in order to create certain covenants running with the land for the

purpose of enforcing the requirements of the HOME Program (24 CFR Part 92) by regulating and restricting the use and occupancy and transfer of the project as set forth herein; and

WHEREAS, the Owner, under this Agreement, intends, declares and covenants that the regulatory and restrictive covenants set forth herein governing the use, occupancy and transfer of the Project shall be and are covenants running with the Project Land for the term stated herein and binding upon all subsequent owners of the Project Land for such term, and are not merely personal covenants of the Owner.

NOW, THEREFORE, in consideration of the promises and covenants hereinafter set forth, and of other valuable consideration, the receipt and sufficiency of which is hereby acknowledged, the Owner agrees as follows:

SECTION 1 – DEFINITIONS

All words and phrases not otherwise defined in this Agreement that are defined in the HOME Program at 24 CFR 92.2 pertaining to the subject matter of the Agreement shall have the same meanings in this Agreement.

SECTION 2 – RECORDING AND FILING; COVENANTS TO RUN WITH THE LAND

(a) Upon execution and delivery by the Owner, the Owner shall cause this Agreement and all amendments hereto to be recorded and filed with the St. Louis County Recorder, and shall pay all fees and charges incurred in connection therewith. Upon recording, the Owner shall immediately transmit to PJ an executed original of the recorded Agreement showing the date and document numbers of record, or a duly certified copy of the executed original.

(b) The Owner intends, declares and covenants, on behalf of itself and all future Owners of the Project Land during the term of this Agreement, that this Agreement and the covenants and restrictions set forth in this Agreement and exhibits hereto regulating and restricting the use, occupancy and transfer of the Project Land and the Project (i) shall be and are covenants running with the Project Land, encumbering the Project land for the term of this Agreement, binding upon the Owner's successors in title and all subsequent owners and operators of the Project Land, (ii) are not merely personal covenants of the Owner, and (iii) shall bind the Owner (and the benefits shall inure to PJ and any past, present or prospective tenant of the Project) and its respective successors and assigns during the term of this Agreement. The owner hereby agrees that any and all requirements of the laws of the State of Minnesota to be satisfied in order for the provisions of this Agreement to constitute deed restrictions and covenants running with the land shall be deemed to be satisfied in full, and that any requirements of privileges of estate are intended to be satisfied, or in the alternate, that an equitable servitude has been created to insure that these restrictions run with the land. For the term of this Agreement, each and every contract, deed or other instrument hereafter executed

conveying the Project or portion thereof shall expressly provide that such conveyance is subject to this Agreement, provided, however, the covenants contained herein shall survive and be effective regardless of whether such contract, deed or other instrument hereafter executed conveying the Project or portion thereof provides that such conveyance is subject to this Agreement.

(c) The owner covenants to obtain the consent of any prior recorded lienholder for the Project to this Agreement, which such consent is required for the awarding of HOME Program funds; provided, however, that such prior lien holder need not subordinate its lien to the provisions of this Agreement. Such consent of any prior recorded lienholder need not be recorded.

SECTION 3 REPRESENTATIONS, COVENENTS AND WARRANTIES OF THE OWNER

The Owner hereby represents covenants and warrants as follows:

(a) The Owner (i) is a _____ duly organized under the laws of _____, and is qualified to transact business under the laws of the State of Minnesota, (ii) has the power and authority to own its properties and assets and to carry on its business as now being conducted, and (iii) has the full legal right, power and authority to execute and deliver this Agreement.

(b) The execution and performance of this Agreement by the Owner (i) will not violate or, as applicable, have not violated any provision of law, rule or regulation, or any order of any court or other agency or governmental body, and (ii) will not violate or, as applicable, have not violated any provision of any indenture, agreement, mortgage, mortgage note, or other instrument to which the Owner is a party or by which it or the Project is bound, and (iii) will not result in the creation or imposition of any prohibited encumbrance of any nature.

(c) The Owner will, at the time of execution and delivery of this Agreement, have good and marketable title to the premises constituting the Project free and clear of any lien or encumbrance (subject to encumbrances created pursuant to this Agreement, any loan documents relating to the Project or other permitted encumbrances).

(d) There is no action, suit or proceeding at law or in equity or by or before any governmental instrumentality or other agency now pending, or, to the knowledge of the Owner, threatened against or affecting it, or any of its properties or rights, which if adversely determined, would materially impair its right to carry on business substantially as now conducted (and as now contemplated by this Agreement) or would materially adversely affect its financial condition.

(e) The Project constitutes or will in whole or in part constitute affordable homeownership housing, as defined in 24 CFR Part 92.254 and applicable HOME Program regulations.

(f) During the term of this Agreement, all HOME-assisted units shall be acquired by a homebuyer whose family qualifies as a low-income family under 24 CFR 92.217, and the housing must be the principal residence of the family.

(g) During the term of this Agreement, the Owner agrees to enforce the resale requirements as required in 24 CFR 92.254 (5)(i) and as outlined in the PJ's resale policy, as more particularly described in Exhibit A (Project description).

(h) The Owner agrees to comply fully with the requirements of the Fair Housing Act as it may from time to time be amended.

(i) The Owner covenants, agrees and warrants that each HOME-assisted unit upon Project completion will meet housing standards established under the City of Duluth Housing Code, Chapter 29A, as amended by ordinance 9462, and may from time to time be amended.

(j) Subject to the requirements of the HOME Program and this Agreement, the Owner may allow the homebuyer to sell, transfer or exchange the Project, at any time, but the Owner shall notify in writing and obtain the agreement of any buyer or successor or other person acquiring the Project or any interest therein that such acquisition is subject to the requirement of this Agreement and to the requirements of the HOME Program and applicable regulations. This provision shall not act to waive any other restriction on sale, transfer or exchange of the Project. The Owner agrees that PJ may void any sale, transfer or exchange of the Project if the buyer or successor or other person fails to assume in writing the requirements of this Agreement and the requirements of the HOME Program.

(k) The Owner agrees to notify PJ in writing of any sale, transfer or exchange of the Project. The Owner shall obtain PJ approvals of the sale, transfer or exchange.

(l) The Owner shall not allow the demolition of any part of the Project or substantial subtraction from any real or personal property of the Project or permit the use of any residential unit for any purpose other than owner occupied housing during the term of this Agreement unless required by law.

(m) The Owner represents, warrants and agrees that if the Project, or any part thereof, shall be damaged or destroyed or shall be condemned or acquired for public use, the Owner will use its best efforts to repair and restore the Project to substantially the same condition as existed prior to the event causing such damage or destruction, or to relieve the condemnation, during the term of this Agreement.

(n) The Owner warrants that it has not and will not execute any other agreement with provisions contradictory to, or in opposition to, the provisions hereof, and that in any event, the requirements of this Agreement are paramount and controlling as to the

rights and obligations herein set forth and supersede any other requirements in conflict herewith.

(o) Upon request by PJ, and as required by the conditions of the HOME Program, the Owner agrees to provide PJ with a completed HOME Program Set-up Report and HOME Program Completion Report detailing the Project's demographic characteristics, finances, and other pertinent information.

SECTION 4 – QUALIFICATION AS AFFORDABLE HOMEOWNERSHIP HOUSING

The Owner represents, warrants and covenants throughout the term of this Agreement and in order to satisfy the requirements of the HOME Program that:

(a) The determination of whether a homebuyer meets the low-income requirement for a HOME-assisted unit shall be made by the Owner at the time of purchase or at the time HOME funds are invested in the Project, whichever is later, based on the household's annual income in accordance with CFR 24 Part 92.203, utilizing the definition of annual income designated by PJ.

(b) The Project housing must be single-family housing in accordance with CFR 24 Part 92.254(a)(1).

(c) The Project housing must be modest in accordance with CFR 24 Part 92.254 (2). In the case of acquisition of newly constructed housing or standard housing, the housing has a purchase price that does not exceed 95 percent of the median purchase price for Duluth. In the case of acquisition with rehabilitation, the housing has an estimated value after rehabilitation that does not exceed 95 percent of the median purchase price for Duluth. Median purchase price is defined as the actual 95% of median sales price for Duluth for the type of home being purchased. When the HOME-assisted property is also a Community Land Trust property, the value of the land may be excluded from the total value to determine the value of the property being acquired by the homebuyer.

(d) Acceptable forms of ownership by the homebuyer of the affordable housing located on the Project land include fee simple title or a 00-year leasehold interest in a one- to four-unit dwelling, or an equivalent form of ownership approved by the PJ and HUD, as defined in CFR 24 Part 92.2.

SECTION 6 – TERM OF AGREEMENT

This Agreement, and the HOME Program occupancy and affordability restrictions Specified herein, shall commence upon the date of the IDIS Notification Certificate provided by PJ to Owner and shall continue for _____ (__) years from and after this date. The Owner shall cause this Notification to be recorded and filed with the St. Louis County Recorder, and shall pay all fees and charges incurred in

connection therewith. Upon recording, the Owner shall immediately transmit to PJ an executed original or the recorded Notification showing the date and document numbers of record, or a duly certified copy of the executed original.

SECTION 7 – ENFORCEMENT OF HOME PROGRAM RESTRICTIONS

(a) The Owner shall permit, during normal business hours and upon reasonable notice, any duly authorized representative of PJ, to inspect any books and records of the Owner regarding the Project with respect to the HOME-assisted units and the income of low-income homebuyers that pertain to compliance with the terms of this Agreement.

(b) The Owner shall submit any other information, documents or certifications requested by PJ, which PJ shall deem reasonable necessary to substantiate the Owner's continuing compliance with the provisions of this Agreement.

(c) The Owner covenants that it will not knowingly take or permit any action that would result in a violation of the requirements of the HOME Program and applicable regulations of this Agreement. Moreover, Owner covenants to take any lawful action (including amendment of this Agreement as may be necessary, in the opinion of PJ) to comply fully with the HOME Program and with all applicable rules, rulings, policies, procedures, regulations or other official statements promulgated or proposed by the Department of Housing and Urban Development from time to time pertaining to Owner's obligations under the HOME Program and affecting the Project. Failure by the Owner to fully comply with the HOME Program and applicable regulations shall constitute default of this Agreement, as well as default of the grant agreement awarding HOME funds to the Project, resulting in the repayment of all HOME Program funds awarded to the Project.

(d) The Owner acknowledges that the primary purpose for requiring compliance by the Owner with the restrictions provided in this Agreement is to assure compliance of the Project and the Owner with the HOME Program and the applicable regulations, and by reason thereof, the Owner, in consideration for receiving HOME funds for this Project, hereby agrees and consents that PJ and any individual who meets the income limitation applicable under the HOME Program (whether prospective, present or former occupant) shall be entitled, for any breach of the provisions hereof, and in addition to other remedies provided by law or in equity, to enforce specific performance by Owner of its obligations under this Agreement in a state court of competent jurisdiction. The Owner hereby further specifically acknowledges that the beneficiaries of the Owner's obligations hereunder cannot be adequately compensated by monetary damages in the event of any default hereunder.

(e) The Owner hereby agrees that the representations and covenants set forth herein may be relied upon by PJ and all persons interested in Project compliance under the HOME Program and the applicable regulations.

(f) The Owner acknowledges that PJ is responsible, pursuant to CFR 42 Part 92.504, to ensure HOME funds are used in accordance with all HOME Program requirements and written agreements, and PJ will establish a procedure to monitor the Owner's and the Project's compliance with the HOME Program requirements.

SECTION 8 – MISCELLANEOUS

(a) Severability. The invalidity of any clause, part or provision of this Agreement shall not affect the validity of the remaining portions thereof.

(b) Notices. All notices to be given pursuant to this Agreement shall be in writing and shall be deemed given when mailed by certified or registered mail, return receipt requested, to the parties hereto at the addresses set forth below, or to such other place as a party may from time to time designate in writing to PJ at Manager, Community Development Division, City of Duluth, Room 407, City Hall Duluth, MN 55802, and to the Owner at _____
_____.

(c) Amendment. Notwithstanding anything to the contrary contained herein, this Agreement may be amended by written agreement between PJ and the Owner, which agreement shall be effective upon execution thereof by PJ and the Owner and the recording of the amendment with the St. Louis County Recorder. The Owner agrees that it will take all actions necessary to effect amendment of this Agreement as may be necessary to comply with the HOME Program, any and all applicable rules, regulations, policies, procedures, rulings or other official statements pertaining to the HOME Program.

(d) Subordination of Agreement. This Agreement and the restrictions hereunder are subordinate to the loan and loan documents, if any, on the Project except insofar as HOME Program requires otherwise.

(e) Governing Law. This Agreement shall be governed by the laws of the State of Minnesota and, where applicable, the laws of the United States of America.

(f) Survival of Obligations. The obligations of the Owner as set forth herein shall survive the awarding of the HOME funds and shall not be deemed to terminate or merge with the issuing of the funds.

IN WITNESS WHEREOF, the Owner has caused this Agreement to be signed by its duly authorized representatives, as of the day and year first written above.

OWNER

By _____

Its _____