

Analysis of Impediment to Fair Housing Choice

Rochester, Minnesota

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Analysis of Impediment to Fair Housing Choice

1.0 Executive Summary

1.1 Introduction

The City of Rochester is an entitlement city that receives Community Development Block Grant (CDBG) dollars. The U.S. Department of Housing and Urban Development (HUD) requires entitlement jurisdictions to certify that it is affirmatively furthering fair housing. This means that each city must conduct an analysis to identify impediments to fair housing choice within its jurisdiction. This report is the 2020 update to the City of Rochester's Analysis of Impediments to Fair Housing Choice, following HUD's format as recommended in the Fair Housing Planning Guide, Volume 1.

1.1.1 Definitions

Fair housing choice – the ability of persons regardless of race, color, religion, sex, handicap, familial status or national origin to have available to them the same housing choices. Minnesota law also adds marital status, status with regard to public assistance, and sexual orientation as protected classes.

Impediments to fair housing choice – any actions, omissions, or decision taken because of race, color, religion, sex, national origin, handicap, familial status, marital status, status with regard to public assistance, and sexual orientation which restrict housing choices or the availability of housing choice.

An analysis of impediments to fair housing choice – is a review of the jurisdiction's policies, procedures and practices that affect the location, availability and accessibility of housing and the current residential patterns and conditions related to fair housing choice.

1.2 Methodology

The City of Rochester conducted the Analysis of Impediments (AI). The methodology used for completion of the AI consisted of:

- Compilation and review of public sector and private sector policies, practices and procedures that may impact housing choice
- Zoning and land use
- Building code requirements
- Administration policies concerning community development and housing activities
- A compilation of demographic data, which describes the income, employment, transportation, ethnicity, and housing characteristics of the City of Rochester

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- A review of existing regional studies and HUD resources related to fair housing issues
 - The development of an Action Plan to address the impediments.

It is important to note that some of the information collected for this study and used to identify impediments was based on individual perceptions, as well as anecdotal information, which are not measurable or documentable. Also, some of the impediments identified are very broad topics, which may be difficult to change or impact at the local level.

1.3 Findings of Analysis of Impediments Study

Through research and interviews it illustrates the City of Rochester and its policies, procedures, and practices are in compliance with Federal Fair Housing guidelines and do not in and of themselves adversely affect citizens' housing choices because of their membership in a protected class. However, fair housing complaints or issues were identified through agency reports and communication with stakeholders.

HUD FHEO reports eight fair housing complaints originating within the City of Rochester from 2015 through year-to-date 2020. The six complaint bases over the five year period equate to 1.6 complaint bases per year.

Southern MN Regional Legal Services recorded 89 fair housing cases originating within the City of Rochester between 2015 – 2019, for an average of 1.8 per year. The Olmsted Human Rights Commission reported 26 fair housing cases within the City of Rochester from 2015 – to 2019, and average of five per year.

Details of the agency cases can be found in Section 6 of this report. The City has drafted a plan to address the potential impediments to fair housing.

1.4 Conclusions

The impediments to fair housing choice that have been identified as a result of this report are listed below. These items function as barriers to an individual or family's choices in finding housing. Recommended actions for each impediment have been suggested as ways to minimize these impediments and are detailed in Section 9 of this report. These impediments are common to many communities and are not unique to Rochester.

1. Limited supply of large, affordable rental units for larger families
2. Limited fair housing education
3. Limited supply of handicap-accessible, affordable rental units

Rochester's population continues to grow in diversity each year. As the City's diversity grows, so too must its activity in fair housing issues. The City of Rochester appears to be keeping pace with its changing population. The major impediment to fair housing appears to be based on the protected class of disability—both physical and developmental. Similarly, attention must be paid to people's perception of members of a protected class. More education and outreach needs to be done with the public at large, and specifically target more managers and landlords of rental properties, in Rochester. Currently, this activity is being done on a random basis. A coordinated, larger-scale educational effort should be considered in conjunction with the Olmsted County Human Rights Commission.

2.0 Demographic Data

The following section provides general jurisdictional demographic data, income characteristics, employment information and housing data. This data provides a basis from which an analysis of impediments to fair housing choice can be conducted.

The source for the bulk of the data is the U.S. Bureau of Census 2011-2015 American Community Survey (ACS) five-year estimates information. The ACS estimates represent the average characteristics of population and housing between January 2011 and December 2015 and DO NOT represent a single point in time. ACS does not provide updated numbers on all demographics and some instances we needed to rely on 2010 Census data.

Where available, this information has been supplemented by other sources as named in this report.

2.1 Population

The U.S. Census reports the overall population of the City of Rochester grew 24.6% from 2000 to 2010 growing from 85,806 persons in 2000 to 106,963. The Minnesota Demographer's Office estimates an additional 8.2% increase from 2010 to 2017, for a total 2017 estimated population of 115,821.

2.2 Minority Population

The Fair Housing Act protects against housing discrimination on the basis of race and color. The City of Rochester's 2011-2015 estimated minority population is 18.1% in 2015 as it was per the last 2000 decennial census. Minnesota's 2011-2015 estimated minority population is 15.2%. In Rochester, Asian is the largest minority group, followed by African Americans. Table 1 provides a breakdown of Rochester's minority population.

**Table 1
Minority Distribution**

	White	African American	Am. Indian/ Alaska Native	Asian	Other (incl. 2 or more)	Total Non-White Population
2011-2015 est.	81.9%	7.9%	0.8%	8.5%	3.9%	18.1%
2010 Census	81.9%	6.2%	0.3%	6.7%	4.5%	18.1%

By comparison, the City of Rochester's percent of minority population is higher than the State of Minnesota, which had 15.5% minority population in 2010 and it is estimated to be at 17.3% in 2017.

2.3 Senior Population

For the purposes of the analysis, persons aged 65 years or older are defined as senior. The U.S. Bureau of Census 2011-2015 American Community Survey (ACS) reports Rochester had a population of persons 65 years of age or older of 15,218 for the five-year estimates. This is an increase of 1,611 over the 2010 Census figures. Of those over 65, 49% are 75 years of age or older and 15.9% are 85 or older. These numbers represent additional elderly persons potentially seeking accessible housing, facilities, services, and programs.

**Table 2
Age Distribution**

Age Group	2011-2015 Est.			Totals	2010 Census			Totals
	65-74	75-84	85+		65-74	75-84	85+	
Number	7,719	5,073	2,426	15,218	6,773	4,538	2,296	13,607
Percent	7.0%	4.6%	2.2%	13.8%	6.3%	4.2%	2.1%	12.7%

2.4 Minor Population

Persons less than 18 years of age are considered by law to be children and minor persons. Persons in this age category are a protected class under the familial status requirements of the Fair Housing Act. In the 2017 estimate ACS survey, there were 27,892 persons reported that were under 18 years of age in Rochester. This is a small increase from the 2010 Census that reported 26,470 persons under 18 years of age in Rochester.

2.5 Family Household Population

Because the Fair Housing Act protects families with children against housing discrimination, family and household demographics are a consideration. In Rochester, the 2010 Census reported 13,705 households with children 18 years of age or younger present. By 2017 it is estimated to have grown to 15,393 households with children 18 or younger present.

2.6 Disability Population

Persons with disabilities are a protected class under the Fair Housing Act. The U.S. Bureau of Census 2011-2015 American Community Survey (ACS) five-year estimates calculates the civilian non-institutionalized population for the City of Rochester to be 108,385 persons. The 2011-2015 Census shows approximately 9.5% (10,297) of this population has some type of disability. As the age brackets increase, so does the percentage of that population being disabled increases and the largest percentage of persons disabled is in the 65-years or older category, with 27.6% of those persons having a disability.

**Table 3
Disability for Civilian Non-Institutionalized Population, 5+ Years**

Age Group	Number with Disability	Percent Disability
5 to 17 years	469	4.9
18 to 34 years	793	5.9
35 to 64 years	2,146	11.1
65+ years	1,639	27.6

Table 4
Disability for Civilian Non-institutionalized Population, 18-64 Years

	18 to 34 years		35 to 64 years	
	Number	Percent	Number	Percent
With a hearing difficulty	158	.6	692	1.7
With a vision difficulty	201	.7	641	1.6
With a cognitive difficulty	976	3.6	1,889	4.7
With an ambulatory difficulty	313	1.1	1,738	4.4
With a self-care difficulty	239	.9	803	2.0
TOTALS	1,887	7	5,763	14

2.7 Ethnic Population

The Fair Housing Act protects against housing discrimination on the basis of national origin. The largest such ethnicity in Rochester is Hispanic with 5,508 Hispanic persons, according to the 2010 Census. This population grew to 6,175, or 5.6%, in the 2011-2015 ACS report. Rochester’s 5.6% Hispanic population is just slightly above the state’s percentage of Hispanic population, which is 4.7%.

3.0 Income Characteristics

The overall median household income for the City of Rochester is \$64,554 from the 2011-2015 ACS, up slightly from the 2010 Census median household income of \$60,883 a 6% increase. For the purposes of this study, the income is looked at by race, occupational, and age groups.

3.1 Income by Race

The most recent income data analysis by race is from the 2011-2015 ACS does not break down the income data by race.

Table 5
Income by Race – 2011-2015 Census

Income Type	All	White	African American	Am. Indian	Asian	Other
Area Median Income	\$64,554	\$65,411	\$30,954	\$66,910	\$81,490	\$54,722

3.2 Wages

Table 6
Average Wages by Occupation

Job Title	Wage/Hr
Natural Resources and Mining	\$22.55/hr
Construction	\$28.10/hr
Manufacturing	\$22.46/hr
Trade, Transportation and Utilities	\$17.52/hr
Information	\$28.32/hr
Financial Activities	\$27.23/hr
Professional and Business Services	\$26.58/hr
Education and Health Services	\$21.89/hr
Leisure and Hospitality	\$11.83/hr
Other Services	\$16.21/hr
Public Administration	\$27.20/h

Source: DEED - Labor Market Information: OES First Quarter, 2019

3.3 Household Income

The most recent data for household income distribution by age groups is from the 2011-2015 ACS. Table 7 shows that income increases with age, until the age group 65+, when it starts to decline.

Table 7
Household Income by Age – 2011-2015 Census

Household Income	Total	Under 25	25-44	45-64	65+
Less than \$10,000	2,314 5.7%	445 19.2%	785 33.9%	623 26.9%	461 19.9%
\$10,000-\$19,999	3,317 7.6%	496 15%	597 18%	1,043 31.4%	1,181 35.6%
\$20,000-\$29,999	3,967 9.1%	393 9.9%	1,057 26.6%	1,072 27%	1,445 36.4%
\$30,000-\$39,999	3,639 8.3%	338 9.3%	1,286 35.3%	1,053 28.9%	962 26.4%
\$40,000-\$49,999	3,529 8.1%	264 7.5%	1,296 36.7%	1,116 31.6%	853 24.2%
\$50,000-\$74,999	8,016 18.4%	342 4.3%	3,609 45%	2,226 27.8%	1,839 22.9%
\$75,000-\$124,999	11,111 25.5%	135 1.2%	4,953 44.6%	4,359 39.2%	1,664 15%
\$125,000-\$199,999	5,192 11.9%	27 0.5%	2,173 41.9%	2,498 48.1%	494 9.5%
\$200,000+	2,549 5.8%	53 2.1%	801 31.4%	1,374 53.9%	321 12.6%

4.0 Employment Profile

4.1 Major Employers

The top 10 employers in Rochester are shown in Table 8. Sector employment varies from manufacturing, education to government, but health care surpasses all others, and the Mayo Medical Center easily achieves the number one employer in the city.

Table 8
Top 10 Employers

Employer	Product/Service	# Employees
Mayo Medical Center	General Medical & Surgical Hospitals	36,330
IBM Corp	Semiconductor & Other Electronic Component Manufacturing	2,791
Rochester Public Schools	Elementary & Secondary Schools	2,873
Rochester, City of	Executive, Legislative, & Other Gen. Govt. Support	1,764
Olmsted Medical Center	General Medical & Surgical Hospitals	1,346
Olmsted, County of	Executive, Legislative, & Other Gen. Govt. Support	1,340
McNeilus Truck & Manufacturing	Steel Manufacturing	1,250
Spectrum	Cable & Other Subscription Programming	634
Crenlo	Operator Cabs and Roll Over Protective Manufacturing	633
Benchmark Electronics	Electronics Manufacturing	540

Department of Employment and Economic Development MN Pro Website

4.2 Unemployment Rate

The unemployment rate for the City of Rochester over the last 10 years was at 3% in 2017, according to Minnesota Unemployment Statistics from the Department of Employment and Economic Development. Then from 2009 – 2017 it decreased each year, with a slight increase to 3.3% in 2016.

Table 9
Unemployment Rate

2017	3%	2012	4.7%
2016	3.3%	2011	5.6%
2015	3.2%	2010	6.3%
2014	3.6%	2009	6.5%
2013	4.2%	2008	4.6%

Minnesota Local Area Unemployment Statistics Data

4.3 Occupation by Race

The most recent data for distribution of jobs by race in the Rochester labor force is from the 2011-2015 ACS. Each job category lists a number and a percentage. The percentage shows the percentage of each individual race that work in the designated occupations.

Table 10
Occupation by Race

Occupation	White	Hispanic	African American	Asian	American Indian
Total Civilian Labor Force	50,189 (100%)	2,863 (100%)	2,707 (100%)	4,392 (100%)	116 (100%)
Management/ Business/ Science and Arts Profession - \$23.57-\$44.59/hour	24,804 (49.4%)	841 (29.4%)	949 (35.1%)	2,436 (55.5%)	33 (5.7%)
Service Workers - \$12.32/hour	7,795 (12.2%)	225 (23.3%)	255 (22.3%)	320 (13.3%)	14 (28.4%)
Sales Workers – \$13.10/hour	8,468 (16.9%)	267 (8.6%)	274 (10.1%)	598 (13.6%)	0 (0%)
Natural Resources/ Construction/ Maintenance – \$13.15-\$26.75/hour	2,851 (5.7%)	247 (8.6%)	64 (2.4%)	67 (1.5%)	0 (0%)
Production/ Transportation/ Material Moving - \$17.38-\$19.41/hour	4,349 (8.7%)	670 (23.4%)	526 (19.4%)	488 (11.1%)	38 (32.8%)

Source: Equal Employment Opportunity Data from the 2011-2015 Census.

The largest percentage of white employees in the Rochester MSA are employed in the management/business/science and arts group (49.4%), earning between \$23.57-\$44.59 per hour. For the minority populations it looks like:

Hispanic – 29.4%	Management/Business/ Science/Arts Profession	\$23.57-\$44.59 /hour
African-American – 35.1%	Management/Business/ Science/Arts Profession	\$23.57-\$44.59 /hour
Asian – 55.5%	Management/Business/ Science/Arts Profession	\$23.57-\$44.59 /hour
American Indian – 32.8%	Production/Transportation Materials Moving	\$17.35-\$19.41 /hour

5.0 Housing Profile

5.1 Type of Housing

There were an estimated 45,455 housing units in Rochester in 2015, according to the 2011-2015 ACS. Of these, 30,611 were owner-occupied units and 11,952 were renter-occupied units. During the time of the 2011-2015 ACS, 2,842 housing units were vacant, which is an overall 6.2% vacancy rate. There is great disparity of vacancy rates between owner-occupied and rental; owner-occupied has a 1.5% vacancy rate while the rental vacancy rate is 8.4%.

There are a number of housing factors that could be included in this section, but the following characteristics relevant to fair housing were selected:

5.2 Housing Type

Table 11
Housing Type

Units	Number	Percent
Single Units detached	29,382	65%
Single Units attached	3,144	7%
2 to 4 units	3,307	7%
5 to 19 units	3,360	7%
20+ units	5,442	12%
Mobile home	1,076	2%

5.3 Housing Stock Condition

Substandard housing can be defined as any housing unit that does not meet current city building code, or does not meet minimum health and safety codes. According to this definition, it can be deduced that most housing built before 1960 would not meet current housing standards due to outdated plumbing and electrical systems and non-conformance to lead-based paint regulations. Using this definition and the 2011-2015 ACS, it can be extrapolated that 10,107 housing units or 23.4% of Rochester's housing stock is substandard.

Aside from age, there is limited information from the U. S. Census related to other measures of substandard housing. They do include factors that lead to substandard housing such as overcrowding, plumbing and kitchen facilities, non-standard heating source and lack of telephone service.

Overcrowding: The measure of overcrowding of a dwelling unit is when more than one person per room exists. Rooms used in this determination are living, dining and bedrooms, finished recreation rooms, enclosed porches, and lodgers' rooms. In Rochester the 2011-2015 ACS found that 869 or 1.9% of the total occupied housing units had one or more persons per room and thus overcrowded. This is more prevalent in rental units with 598 units (68%) than owner-occupied units with 271 (31%). During this same time, the State of Minnesota had a higher percentage, 2.1%, that had one or more persons per room. Comparatively, overcrowding does not appear to be a significant problem within the City of Rochester's housing stock.

Plumbing Facilities: Housing without complete plumbing facilities is considered substandard. The 2011-2015 ACS reports that 182 units, or 0.4% of the city's entire housing stock, have incomplete plumbing facilities. The state has a 0.2% of its housing stock with incomplete plumbing facilities. Again, from this data the lack of complete plumbing facilities does not appear to be a problem with the City of Rochester's housing stock.

Heating Fuel: Housing without systematic source and supply of heating fuel such as natural gas or electricity can be considered substandard. The 2011-2015 ACS found little use of propane (1.9%), kerosene (0.2%), wood (0.4%), or coal (0.0%) as the primary sources of residential heating. When totaled, only 4.1% of homes used something other than a

systematic source and supply of heat. Given this data, heating source does not appear to be a problem with Rochester's housing stock.

Telephone Service: The availability of telephone service has risen above the fact of being a mere convenience to one of near necessity in modern life whose absence can be considered a measure of substandard condition. It is critical in summoning needed life and safety services such as fire, police and ambulance; or reporting key service failures such as electrical and water. For the elderly and disabled persons, it can be a key connection to meals, medical treatment, transportation and other personal care and community services. Of Rochester's housing units, 1.7% are without telephone services, as reported by the 2011-2015 ACS. With the advent of the cellular phone, some persons are choosing not to have a "land line" installed in their homes. Regardless of the reason, it does not appear that lack of telephone service is a contributing factor to substandard housing in Rochester.

5.4 Housing Costs

According to the 2011-2015 ACS, the median value of owner-occupied housing units in Rochester is \$164,900. The median mortgage payment is \$1,490 per month. The ACS further estimates that 23.7% of households are spending 30% or more of their income on housing related costs.

6.0 Evaluation of Jurisdiction's Fair Housing Profile

A primary measure of impediments to fair housing choice within any community is a review of fair housing complaints. A complaint is someone's belief that they were not treated fairly. Complaints are not a judgment that discrimination has occurred. The complaints contained herein are those that have been formally filed with enforcement agencies. There are four major sources of such data for the City of Rochester: U.S. Department of Housing and Urban Development (HUD) Office of Fair Housing and Equal Opportunity (FHEO), the Minnesota Department of Human Rights (MDHR), Southern Minnesota Regional Legal Services, Inc. and the Olmsted County Human Rights Commission.

No finding of housing discrimination has been made against the City of Rochester or any governmental entity within its jurisdiction. The City has not had any housing discrimination suits filed against it by the Department of Justice or the Minnesota Attorney General's Office.

6.1 HUD FHEO Data

HUD FHEO reports eight fair housing complaints originating within the City of Rochester from 2015 through year-to-date 2020. Of those eight, six were on the basis of disability, one was on race and one was on the basis of sex. The six complaint bases over the five year period equate to 1.6 complaint bases per year.

Five cited discrimination in terms and conditions, five cited discriminatory acts under Section 818 (coercion, etc.), six cited failure to make reasonable accommodations, and three cited discriminatory refusal to rent (many of the complaints cited more than one issue).

There was one no cause determinations made, five elected to go to court and, one complaint withdrawn, and one complainant failed to cooperate.

The mere reporting of the number of cases and number of bases filed would cause difficulties in understanding the nature of impediments to fair housing choice being experienced by the

protected classes. In consideration of this and other concerns, the complaint data from HUD is listed on the number of complaint bases filed.

**Table 12
City of Rochester Complaint Bases Data HUD FHEO Data**

Year	2015	2016	2017	2018	2019	YTD 2020	Totals
Race	0	0	0	1	0	0	1
Color	0	0	0	0	0	0	0
Sex	0	0	0	0	0	1	1
Religion	0	0	0	0	0	0	0
National Origin	0	0	0	0	0	0	0
Familial Status	0	0	0	0	0	0	0
Disability	3	2	0	1	0	0	4
TOTALS	3	2	0	1	0	1	8

6.2 Southern Minnesota Regional Legal Services, Inc. (SMRLS)

SMRLS provides legal services to low-income persons and eligible client groups in civil matters. Data received from SMRLS shows that in a five year period, from 2015 through 2019, they handled 89 fair housing cases.

**Table 13
City of Rochester Complaint Bases Data SMRLS Data ~ 2015 – 2019**

Protected Class	Number of Cases
Race	4
National Origin	19
Family Status	3
Disability	59
Gender	3
Religion	1
TOTALS	89 cases

Of the 84 cases, two are still open, 41 were provided advice, 23 settled with non-monetary relief, five settled during litigation with non-monetary relief, two had an agency (HUD or MDHR) decision with non-monetary relief, in five cases either were rejected or the agency decision lost, five settled pre-litigation with damages, three settled during litigation with damages, and one court decided with damages.

6.3 Olmsted County Human Rights Commission

Olmsted County maintains a human rights commission with a director, which covers the City of Rochester. The vision of the Commission is to have “a discrimination-free community” and its mission is “to make our community, Olmsted County, free of discrimination and to promote equal opportunity for all our people.” The Commission provides a legal avenue for all Olmsted County residents to find remedies for Human Rights issues, an opportunity other than the Courts for the remedy, and an informational database to identify common themes that help to focus on particular human rights training needs.

The Olmsted County Human Rights (OCHR) Commission has a Human Rights Line that is available in seven languages: English, Spanish, Somali, Arabic, Vietnamese, Cambodian/Khmer, and Hmong. Soon Lao will be added, as well as other languages as needed.

OCHR managed 26 fair housing cases within the City of Rochester from 2015 – 2019. Below is a breakout of those cases.

Table 14
City of Rochester OCHR Fair Housing Cases

OCHR Fair Housing Cases 2015 – 2019						
Year	2015	2016	2017	2018	2019	Totals
Race	0	0	0	1	0	1
National Origin	0	0	1	0	0	1
Disability	4	6	1	0	5	16
Religion	0	0	1	0	0	1
Age	4	1	0	0	0	5
Unstated	1	0	0	0	1	2
TOTALS	9	7	3	1	0	26

Of the 26 cases filed between 2015 – 2019, 19 were referred by legal services, four were referred by Alternative Housing Resources, three were referred by Mediation Services, two were referred by the Building Safety Department, one was referred by Victim Services, nine were referred by the Minnesota Department of Human Rights, one was referred by other Civil Rights Organizations, and one was referred by Disability Resources.

6.4 Home Mortgage Disclosure Act Information

Information related to the Home Mortgage Disclosure Act was reviewed for the last four years available, 2014 – 2017. The following four tables illustrate the data by race.

Table 15
Disposition of Applications by Race/Ethnicity – 2017(Includes Conventional, FHA, FSA/RHA, and VA Loans)

Race	App's Received	Loans Originated	Percent Approved	% App's Approved /Not Accepted	% App's Denied	% App's Withdrawn	% Closed - Incomplete
American Indian Alaskan Native	6	6	100%	-	-	-	-
Asian	289	279	81%	4%	8%	10%	-
Black	84	66	82%	4%	8%	10%	-
Nat. Hawaiian/ Pac Islander	8	7	87%	-	13%	-	-
White	4,031	3,356	87%	3%	7%	6%	1%
Hispanic	105	83	82%	1%	12%	6%	2%

Table 16
Disposition of Applications by Race/Ethnicity – 2016
(Includes Conventional, FHA, FSA/RHA, and VA Loans)

Race	App's Received	Loans Originated	Percent Approved	% App's Approved /Not Accepted	% App's Denied	% App's Withdrawn	% Closed - Incomplete
American Indian Alaskan Native	6	2	33%	-	50%	17%	-
Asian	211	172	87%	5%	9%	4%	-
Black	73	56	79%	1%	14%	17%	1%
Nat. Hawaiian/ Pac Islander	2	2	100%	-	-	-	-
White	4,020	3,406	89%	4%	6%	5%	1%
Hispanic	107	8	82%	7%	14%	4%	-

Table 17
Disposition of Applications by Race/Ethnicity – 2015
(Includes Conventional, FHA, FSA/RHA, and VA Loans)

Race	App's Received	Loans Originated	Percent Approved	% App's Approved /Not Accepted	% App's Denied	% App's Withdrawn	% Closed - Incomplete
American Indian Alaskan Native	2	1	50%	-	-	-	50%
Asian	194	136	86%	7%	14%	8%	1%
Black	76	61	84%	1%	16%	3%	-
Nat. Hawaiian/ Pac Islander	6	4	100%	17%	-	17%	-
White	4,169	3,486	89%	5%	6%	5%	1%
Hispanic	100	74	84%	8%	12%	4%	2%

Table 18
Disposition of Applications by Race/Ethnicity – 2014
(Includes Conventional, FHA, FSA/RHA, and VA Loans)

Race	App's Received	Loans Originated	Percent Approved	% App's Approved /Not Accepted	% App's Denied	% App's Withdrawn	% Closed - Incomplete
American Indian Alaskan Native	7	4	100%	-	-	-	-
Asian	148	114	82%	4%	13%	5%	1%
Black	44	29	68%	-	23%	9%	2%
Nat. Hawaiian/ Pac Islander	7	7	100%	-	-	-	-
White	3,379	2,706	86%	5%	9%	6%	1%
Hispanic	73	51	77%	7%	21%	3%	-

These tables show the overwhelming majority of mortgage applications are made by white applicants. For example, in 2015 there were 4,169 white applicants for home mortgages, while minority applicants totaled 378. Percentages can be misleading when the sample set is so small to begin with. For example, in 2016 it shows an approval rate of 33% for American Indian/Alaskan Native, but there were only a total of six applications that year from that race. To get a better picture, data from each of the four years was averaged to come up with each race's average approval rate for the four years. White, Native Hawaiian/Pacific Islander and Asian received the highest approval rates while American Indian/Alaskan Native, Black, and Hispanic applicants received between 10 – 19% lower approval rates.

Race	Four-Year Average Approval Rate
American Indian/Alaskan Native	71%
Asian	84%
Black	78%
Native Hawaiian/Pac. Islander	97%
White	88%
Hispanic	81%

Race alone does not tell the whole story as income is an obvious consideration for home mortgages. Table 17 explores the loan approval rate by income breakdown of the applicants.

Table 19
Disposition of Applications by Income

Percent of Median Income	Percent Approved - 2014	Percent Approved - 2015	Percent Approved - 2016	Percent Approved - 2017
<50%	77%	80%	82%	74%
80-99%	80%	85%	86%	85%
120%+	80%	84%	85%	87%

The HMDA data is not conclusive or detailed enough for a thorough analysis; however, it is the only such information available at this time. Given the number of foreclosures in the past year, as well as suspect lending practices, it may be some time before HMDA data can provide meaningful information on whether housing discrimination is occurring through lending or not.

6.5 Other Fair Housing Concerns

■ Segregation

Based on information from the 2010 Census, the most recent data available for census tracts, there does not appear to be large areas of segregation in the City of Rochester. Rochester is comprised of 20.2% minority population and among the census tracts including the City, there is between 12% and 28.3% minority population, with two exceptions. Census tracts 15 (15.01-15.03 combined) and 11 have low minority populations around 9.5%. The specific breakdown is as follows:

<u>Census Tract</u>	<u>Percent Minority Population</u>
1	15.5%
2	28.3%
3	20.3%
4	12.0%
5	25.4%
6	17.1%
9 (9.01-9.03)	20.3%
10	19.4%
11	9.5%
12 (12.01-.12.02)	12.3%
13.01	22.2%
14 (14.01-14.02)	16.6%
15 (15.01-15.03)	9.4%
16 (16.01-16.03)	13.7%
17 (17.01-17.03)	23.9%
23	16.6%

Rental housing and publicly supported housing is also fairly uniform throughout the City. There is no concentration of these housing types in any particular area (please see Appendix A). The City accomplished its goals of providing affordable housing in scattered locations throughout the community. The City noted in its 2001 *Comprehensive Plan Policy on Affordable Housing and Diversity* that “Segregation by income class may lead to de facto segregation by race in our community. Continuing to curtail the supply of land for affordable housing in fringe locations will jeopardize the supply of affordable housing and will result in concentrating affordable housing in a few heavily impacted neighborhoods.” Rochester continues to integrate neighborhoods with an adequate supply of housing in a variety of price ranges.

7.0 Identification of Impediments to Fair Housing Choice

HUD defines impediments to fair housing choice to include acts or omissions in three categories. These categories are:

- Actions that constitutes violations or potential violations of the Fair Housing Act.
- Actions that are counter-productive to fair housing choice, such as resistance to the introduction of minority, disabled, or low-income populations into a community.
- Actions that have the effect of restricting housing opportunities on the basis of a protected classification.

7.1 Outreach to Area Providers

Education on fair housing issues is provided in several formats for both housing seekers and housing providers.

The **Southeastern Minnesota Association of Realtors**, through their new member orientation, provides information on fair housing. On average, eight - twelve members go through this training on a monthly basis. Additionally, by Minnesota State Statute, formal training and licensing requirements for Real Estate Licensure includes two hours of continuing education of fair housing regulations bi-annually. The association typically sees 100 attendees at these trainings, which are held several times a year. Members of the Association are also encouraged to develop their own sales policies consistent with fair housing guidelines. Efforts to insure fair housing compliance are further enhanced through a written code of ethics subscribed to by all realtor members.

Also providing training is the **Southern Minnesota Regional Legal Services**. They provide training on an annual basis to multi-family complex managers and owners.

The **Rochester Police Department** conducts a program called “Crime Free Multi-housing.” It is geared primarily toward educating complex owners and managers and is a seven hour program that includes a presentation on the Fair Housing Act. This program is supported by the Rochester Area Chamber of Commerce.

The **Rochester Multi Housing Association** provides regular educational programs to assist its members in understanding the Fair Housing Act. Participation in the Association is voluntary and its membership represents owners or managers of the rental properties of Rochester. They have monthly meetings with speakers and at least one meeting per year is dedicated to the fair housing topic.

While there are many educational programs for those seeking housing and those selling/renting housing, there appears to be a need for more educational programs for the general public and specifically rental property owners and managers. A common communicated concern by partners is the need for a change in public perception when it comes to fair housing issues.

7.2 Rental of Housing and Real Estate

In the sale of housing, there is no evidence of racial steering or blockbusting by real estate brokers. There is also no evidence of occupancy quotas in rental housing that deny or restrict housing based on membership in a protected class.

The City of Rochester does not have any regular program that collects summary data from landlords and managers of rental housing on the race, color, religion, sex, disability, familial status, or national origin status of tenants and applicants for rental housing. Nor does the city review any written rental or sales policies of members of the housing industry to determine whether they are consistent with the Fair Housing Act.

As mentioned earlier, there is an association for rental property owners, the Rochester Apartment Managers Coalition Group, that meets on a monthly basis. The group primarily consists of owners/managers of the larger complexes in Rochester. There are 85 persons in this group. They have a speaker at each of their monthly meetings and hear from Rochester Crime Free, receive updates on building codes and safety, as well as fair housing issues. In speaking with the secretary for this group, it was noted that fair housing is an often requested topic in their planning meetings.

7.3 Financing Assistance

As described earlier under the HMDA information, the rate at which some minority applicants are approved compared to others for a home mortgage appear lower but the income needs to be considered as well.

Discrimination in the form of disinvestment practices, redlining and racial credit steering have not surfaced in the community. Internal policies, lending patterns and practices, as well as underwriting and appraisal practices are reviewed and revised by lending institutions on a regular basis to insure compliance with state and federal regulations and the standards established by secondary mortgage buyers. Additionally, loan officers are required to participate in annual training in the application of non-discriminatory policies.

Lenders set requirements regarding the standards that are acceptable for appraisers to use and disclose full appraisal reports to borrowers in compliance with HMDA guidelines. Lenders use a prescreening process based on applicant's income and credit history, document the results of that process and make the document available to the applicant.

Financial institutions in the Rochester area have been actively involved in and supportive of efforts to promote homeownership for low-income to moderate-income families and individuals. Participation in the First Homes Project (an initiative for providing housing to working families), Community Housing Partnership and Habitat for Humanity are examples of banks being involved to create more affordable housing options and increase the rental market.

7.4 Public Policies

Land use policies, zoning ordinances, building occupancy, health and safety codes are all key components of Rochester's housing picture.

- The City of Rochester adopted their Comprehensive Plan in April of 2018. The document, entitled Planning 2 Succeed (P2S), updates the City's Comprehensive Plan and presents a vision of a more balanced approach to the distribution of growth between edge areas and infill/redevelopment areas, encouraging densification, and allowing the City to grow in a more fiscally responsible way.

Public meetings were held to allow the community an opportunity to provide feedback on the scenario planning process. Rochester is a growing community and that growth is anticipated to continue. Growth and change presents both opportunities and challenges. Long-range planning is needed to position the City to address its long-term needs to be resilient, to support changing demographics, and to address housing demand, multi-modal transportation needs, growth in jobs and visitors, and more—while working with finite resources.

The Comprehensive Plan outlines many goals, which guide future policies to put the plan to work. Likewise, the Comprehensive Plan's core principles include expanding housing diversity, enhancing the integrity of existing neighborhoods, and to champion social equity and environmental justice.

- Zoning Ordinance - Rochester's Zoning Ordinance was approved in 1992. It has provisions that allow cluster developments, shortens the time required for the procedure to develop and allows different styles of housing. The ordinance allows for zero-lot lines. Thus, dwelling units can be constructed on a 3,000 square foot lot verses the required 6,000 square foot lot. It also allows reduced side-yard setbacks.

The zoning ordinances were designed to develop different kinds of housing within the city in order to provide a wide range of housing choice for Rochester residents. Areas zoned for medium and high density residential development are scattered throughout the city, not concentrated in one or two areas. There are also provisions for mixed housing development within areas primarily zoned for single-family units. Licensed group homes are permitted in all residential areas, with restrictions based only on the number of residents in the home. Occupancy ordinances define a "family" as up to five unrelated individuals within a dwelling unit, permitting home sharing by unrelated individuals.

- The City has hired a consultant to transform our Land Development Manual and Zoning Ordinances to a Uniform Development Code to help achieve the goals laid out in the Comprehensive Plan. The goal is to adopt the Uniform Development Code (UDC) and Zoning Ordinances changes by 2022. The goals of the UDC project are:
 - Help implement Rochester's 2018 Comprehensive Plan, Plan 2 Succeed (P2S);
 - Expand housing diversity to provide an ample supply of the right type of housing in the right locations to meet the needs of a diverse and growing population;
 - Improve community connectivity to provide convenient and efficient movement of people and goods to and throughout Rochester;

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- Promote Rochester’s commitment to health, wellness, and the environment; and
 - Make the development standards as user-friendly as possible.

The City has added two new zoning districts: a Transit-Oriented Development (TOD) zone and an R2x zone, designed to encourage infill and redevelopment around key corridors and near the Downtown. Both zoning districts could aid affordable housing and align with CDBG goals by increasing density near jobs and Public Transportation, loosening land use controls, and encouraging residential investment. Other possible recommendations include supporting all people to have fair and equal access to adequate affordable housing, establishing a diverse mix of housing types, support housing in locations that contribute to a neighborhood identity, and avoid creating isolated residential developments, which are not part of a larger neighborhood.

- Human Rights Commission - In April of 1998 the City of Rochester Human Rights Commission was abolished and the Olmsted County Human Rights Commission was established. The reason the commission was created at the county level was to identify solutions for human rights issues facing all of the protected classes within all of Olmsted County, including the City of Rochester. The Commission’s primary duties include the development of voluntary no-fault mediation, work with the MN State Department of Human Rights and coordination of activities with other community groups and organizations involved in human rights issues, provide adequate affordable housing initiatives and be involved in the planning to make sure the housing issue is inclusive. The Commission is the organization that addresses illegal discrimination related to housing such as owners or agents refusing to sell or rent, or treating clients differently and realtors withholding available property or services, or claiming the presence of certain residence making the environment undesirable and lenders denying or discriminating terms and conditions of financial assistance. The Commission is composed of 13 members including a member of the Rochester City Council.
- The City of Rochester Building Safety Department, Housing Division, has significantly increased their inspection process of rental housing. If a property is found inhabitable or in need of major repairs, the building owners are given a certain amount of time to correct or face demolition of the structure.
- Municipal Services - The provision of municipal services to areas in which low- and moderate-income families live is another aspect of fair housing choice. The quality and extent of public services and facilities does not vary significantly among residential neighborhoods in Rochester. Schools, recreational facilities, social service programs, parks, roads, transportation, street lighting, crime prevention and police protection activities are equalized throughout the city. As mentioned earlier, there is no one, identifiable, densely populated lower-income or minority residential area in the City.

7.5 Administrative Policies

- Agency Profile - Administrative accountability concerning community development and housing activities in Rochester rests with the Olmsted County Housing and Redevelopment Authority (HRA). In general, all administrative policies and procedures of the HRA have been designed are implemented in compliance with

federal, state and local laws and HUD regulations and guidance. The HRA has no employees but contracts with Olmsted County for staffing needs.

- Programs - The HRA, along with several non-profit agencies, provides affordable housing opportunities for residents of the City of Rochester. The HRA is the only public institution in Rochester and Olmsted County that provides long-term rental assistance for very-low income and low-income households. The Olmsted County HRA owns a number of rental properties and leases to low-moderate income household described as follows:
 - Flood Homes. 14 single family properties with a total of 15 units.
 - River's Edge. This is a mixed income development which provides a number of affordable and market rate units totaling 39 units.
 - The Frances. Consisting of 18 units providing housing for homeless individuals with supportive services provided by Olmsted Community Services.
 - Rolling Heights. This is an RRDL property consisting of 16 two-bedroom units for elderly/ disabled households.
 - Silver Creek Corner. Permanent Supportive Housing for chronic inebriates who are also homeless, housing 40 units of single-resident occupancy. This was a collaborative project between City Center Housing Corp., Olmsted County Community Services and the Olmsted County HRA.
 - Northgate: A Section 811 property assisting elderly and disabled individuals.
 - Bandel Hills: A mixed income townhome development which provides 25 affordable units.
 - Halling House: 8 two-bedroom units for under fair market rate rents
- The HRA administers several programs funded by MN Housing, including Bridges, and Housing Trust Fund. Additionally, the HRA administers the MN Housing Rehab program and has begun its own levy-funded rehab program in 2017. That program provides low-interest deferred loans to low and moderate-income households for safety and security rehab projects, or accessibility projects. The structure of these rehab loans the county offers is very similar to the City's Rehab program. Similar rehab work is eligible and ineligible, has a 2% interest upon repayment, but it is deferred until the home is sold or refinanced under certain conditions. The county program's goal is to provide 15-20 loans each year. In total, the HRA administered 50 rehab loans in 2019.
- The Olmsted County HRA administers the Housing Choice Voucher program and Public Housing. The Olmsted County is allotted up to 556 vouchers, of which 15 are specific VASH vouchers, 30 Project Based Vouchers, 19 Mainstream vouchers and 2 FUP vouchers. Many households have been on a voucher waitlist since 2012—about 141 families remain on the waiting list for housing assistance. Approximately 750 units of housing are provided through low-income public housing, housing option program, housing for people with special needs, and T-RAP.
- Guidelines - Applicant and tenant selection policies are those established by HUD. There is a great deal of attention paid to ensuring non-discriminatory treatment of applicants and tenants. To the extent that there is any concentration of tenants by race

or ethnicity in public housing developments, it is likely a function of a relatively small number of such complexes within the city and relates to self-selection of members of a protected class to live within a common geographical area of Rochester.

- Displacement - Although some persons have been removed from publicly assisted housing during the last several years, there is no evidence that displacement occurred for any reason except for the behavior of the tenant. No know major development or redevelopment program sponsored by the public sector during the last several years has displaced a significant number of affordable housing units.
- Demolition of Subsidized Housing - Since 2001, no subsidized units have been demolished in Rochester. The HRA has a policy to attempt to keep from losing subsidized units through market rate conversion. This policy provides the HRA with a first right of refusal for privately owned subsidized units that may lose their subsidy if they are sold. This does not preclude the HRA from letting a property go to market if it is not feasible to keep it subsidized.

8.0 Assessment of Current Public and Private Fair Housing Programs/Actions in Rochester

Below are agencies, programs and services that exist in the City of Rochester that work to further fair housing.

- **Arc Southeastern Minnesota** – non-profit agency working with disabled persons
- **Bear Creek Services** – non-profit agency working with disabled persons
- **City Home Rehab Program** – single-family home improvement program provided by the City of Rochester using Community Development Block Grant (CDBG) funds
- **County Home Rehab Program** – single-family home improvement program provided by an Olmsted County Levy funds
- **Cronin Homes** – non-profit agency working with persons with special needs
- **Hiawatha Homes** – non-profit agency working with disabled and low-income persons
- **Intercultural Mutual Assistance Association** – provides assistance, support, education, and advocacy for individuals and families who have come to the community as immigrants or refugees
- **Legal Assistance of Olmsted County** – public agency that provides legal assistance for low-income citizens
- **Minnesota Multi-Housing Association** – an information resource hotline for landlords, owners, and tenants with legal questions
- **Olmsted County Community Action** – non-profit agency working with low-income residents
- **Olmsted County Human Rights Commission** – public agency offering information, support and services in order to handle discrimination on the basis of race, color,

creed, religion, national origin, sex, age, disability, marital status, status with regard to public assistance, sexual orientation, or familial status

- **Olmsted County Housing and Redevelopment Authority** – public housing agency providing assistance for rental, home improvement and homeownership programs and providers of information regarding landlord-tenant rights
- **PossAbilities of Southeastern Minnesota** – non-profit agency working with disabled persons
- **RADAR** – non-profit agency working with disabled students
- **Rochester Area Foundation – First Homes and Heritage Homes Programs** – non-profit agency providing affordable housing options to low- to moderate-income persons
- **Rochester Chamber of Commerce** – a business membership association that has raised the visibility of housing issues and helps to identify partners and solutions
- **Rochester Habitat for Humanity** – non profit agency that assist low-income persons become homeowners through no-interest loans and low-cost basic housing
- **Southern Minnesota Regional Legal Services** – SMRLS's lawyers and paralegals provide free legal representation and advice to low income people – priority cases include access to public assistance, obtaining and maintaining shelter, and protection from domestic abuse – specific projects focus on education law, fair housing and discrimination, citizenship, and youth victims of domestic violence
- **Southeastern Minnesota Center for Independent Living** – non-profit agency working with disabled persons
- **The Diversity Council** – a private non-profit organization providing education and advocacy throughout the community on issues related to cultural and racial diversity
- **United Way** – a non-profit agency organization that raises funds to assist local service agencies with programs assisting low-income persons
- **Women’s Shelter** – non-profit agency working with battered women
- **Zumbro Valley Mental Health Center** – non-profit agency providing housing and support services for low-income mentally ill persons

9.0 Conclusions & Recommendations

Based upon the information gathered to produce the Analysis of Impediments to Fair Housing, several conclusions can be drawn regarding fair housing in the City of Rochester.

Although the public sector, through policies and practices of the City of Rochester, does not restrict fair housing choice, there are some areas of concern:

- Limited fair housing education and resulting misperception of residents and rental property owners and managers regarding protected classes.
 - i. Recommendation – Support the efforts of area providers in their quest to educate the general public regarding fair housing issues.
 - ii. Recommendation – Support the efforts of area providers connecting with the rental community through existing associations and networks.

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- iii. Recommendation – Help to disseminate information on existing training and the availability of SMRLS training program for rental property owners and managers.
 - iv. Recommendation – Support public education efforts regarding the fact that scattered subsidized and special needs housing does not adversely affect housing value in adjacent areas.
 - v. Recommendation – Work with community non-profit agencies on special events that commemorate diversity in the city.
 - vi. Recommendation – Encourage the Olmsted County HRA to continue their outreach to landlords monthly. Information is inserted into the landlord’s monthly housing assistance payment.
 - vii. Recommendation – Support the development of affordable housing for large families and for individuals or families that have special accessibility needs.
 - viii. Recommendation – Support the development of larger, affordable handicap accessible units.
 - ix. Recommendation – Support SMRLS’ efforts to educate landlords that reasonable accommodations must be made to a rental unit to make it handicap-accessible if none currently exist, under the fair housing act.
- The City of Rochester’s policies and procedures do not in and of themselves create an impediment to fair housing. It was noted in the last AI that the current land use plan did not make it easy for the zoning of land for building affordable, single-family and multifamily housing with access to commercial and social services. The Rochester Community Development Department and previously Rochester-Olmsted Planning Department has since revised the comprehensive plan to address that concern. As mentioned, the City has hired a consultant to transform our Land Development Manual and Zoning Ordinances to a Uniform Development Code to help achieve the goals laid out in the Comprehensive Plan. A housing related goal is to expand housing diversity to provide an ample supply of the right type of housing in the right locations to meet the needs of a diverse and growing population.
 - i. Recommendation – continue to monitor land use plan and its effects on fair housing issues.

Rochester is a growing community with affordability of housing issues that have developed over time and circumstances. They have been created by the attraction of people wanting to improve their circumstances in a community with low unemployment and a time of low mortgage rates. Rochester has fluctuating rental vacancy rates and a high level of home ownership, which has increased in the last decade and this leads to a shortage of all kinds of housing. Additionally, renters are absorbing the high property tax burden placed on rental properties and passed on as part of their monthly rent. The decline in federal housing subsidies to assist developers in building affordable housing has discouraged the development of affordable housing.

Rochester’s population is becoming more diverse each year. As the community changes, the public and private sectors are taking positive actions to address the affordable housing shortage.

10.0 Identification of Data Sources

10.1 Studies, Reports and Other Data

- *2010 Census*, U.S. Bureau of the Census, 2010
- U.S. Bureau of Census 2011-2015 American Community Survey (ACS) 5-Year Estimates
- *2020 – 2024 Consolidated Plan*, City of Rochester, 2020
- *Analysis of Impediments to Fair Housing Choice*, Rochester, 2010
- *Comprehensive Housing Affordability Strategy (CHAS) Data Book*, HUD, 2015
- *Home Mortgage Disclosure Act* data, various Rochester financial institutions, 2014 – 2017
- *Labor Market Information*, Department of Employment and Economic Development, Second Quarter, 2020
- *MNPro* website, Department of Employment and Economic Development, March 2020
- *Minnesota Unemployment Statistics*, Department of Employment and Economic Development, 2013 – 2017
- *Zoning Ordinance and Land Development Manual*, City of Rochester

Appendix A

Rental Housing Types by Location

