



**U. S. DEPARTMENT OF HOUSING AND URBAN
DEVELOPMENT**

FHEO Region V
Ralph H. Metcalfe Federal Building
77 West Jackson Boulevard – Room 2101
Chicago, Illinois 60604-3507

Office of Fair Housing and Equal Opportunity

February 26, 2016
Mr. Karl Batalden
Housing and Economic Development Coordinator
8301 Valley Creek Road
Woodbury, Minnesota 55125

Dear Mr. Batalden:

This letter is in reference to discussions our offices have had about potential revisions to the 2014 Minneapolis-St. Paul regional analysis of impediments (herein, “AI”) prepared by the Fair Housing Implementation Council (FHIC) on behalf of 13 entitlement communities – Anoka County, Dakota County, Hennepin County, Ramsey County, Washington County, the City of Bloomington, the City of Coon Rapids, the City of Eden Prairie, the City of Minneapolis, the City of Minnetonka, the City of Plymouth, the City of St. Paul, and the City of Woodbury – in the Twin Cities metro area. We greatly appreciate your dedication to enhancing the AI and developing innovative strategies to affirmatively further fair housing in the region.

In a conversation with the Department, members of the FHIC acknowledged potential concerns regarding their AI, including the need to adequately analyze pertinent issues relating to residential racial segregation. I was pleased that members of the FHIC expressed their willingness to collaboratively revise the AI to address these concerns.

The Department believes that this collaborative effort presents a valuable opportunity for the Twin Cities region to utilize the tools offered under the Department’s new Affirmatively Furthering Fair Housing rule to revise and improve the AI. I am optimistic that a broad regional fair housing planning process, supported by cutting-edge analytical tools and informed by meaningful community outreach and participation, will result in an AI that addresses fair housing issues and sets constructive goals for the Minneapolis-St. Paul region.

Toward this end, in lieu of a 2016 revision to the current AI to support your jurisdictions’ certifications to affirmatively further fair housing, the Department will accept your jurisdictions’ assurances that you will revise the AI by no later than April 15, 2017, and in accordance with the Road Map set forth below. Upon receipt of such assurances, the Department will defer its review of your AI for a year in view of our mutual expectation that, subject to delays beyond your control, you will submit a revised AI before April 15, 2017.

Road Map to Revise Analysis of Impediments

Agreement by members of the FHIC to the following principles for revising the AI will assure the Department of the members' commitment to affirmatively further fair housing:

- That, in light of the release of HUD's Affirmatively Furthering Fair Housing (AFFH) rule on July 16, 2015 and the new data analysis tools made available thereunder, members of the FHIC will conduct an addendum to the existing Analysis of Impediments (herein, "AI") informed by the instructions and tools provided with the new rule (including the Assessment Tool for local governments published December 31, 2015, the HUD AFFH Data and Mapping tool, and AFFH Rule Guidebook), to be completed by April 15, 2017, subject to delays beyond reasonable control;
- That such addendum to the existing AI will consider, both regionally and specific to each jurisdiction, the fair housing issues of segregation, racially or ethnically concentrated areas of poverty, access to opportunity and disproportionate housing needs (as defined in the rule and Assessment Tool), and will consider, in particular, the distribution of affordable housing resources in the region;
- That the process for completing the addendum to the existing AI will provide for robust community participation;
- That the AI process will seek to develop innovative regional strategies that may serve as best practices for entitlement communities going forward.

The Department welcomes further discussions with the FHIC and its entitlement communities to clarify the exact parameters of this process.

Your jurisdictions may provide the requested assurances by signing the attached statement and submitting it with your 2016 Annual Action Plan certifications. To facilitate this process, each jurisdiction may sign a separate copy of the statement.

Please note that this letter does not in any way impact any authority the Department may have to investigate any complaint involving the entitlement communities made pursuant to the Fair Housing Act, or any other legal authority within the Department's jurisdiction.

The Department appreciates your continued commitment to working on these issues. If you have any questions or concerns about the contents of this letter, please do not hesitate to contact me at (312) 913-8400 or at maurice.j.mcgough@hud.gov.

Sincerely,


Maurice J. McGough
FHEO Region V Director

Attachment

Road Map to Revise Analysis of Impediments

Pursuant to a mutual commitment to affirmatively further fair housing, members of the Fair Housing Implementation Council (FHIC) – Anoka County, Dakota County, Hennepin County, Ramsey County, Washington County, the City of Bloomington, the City of Coon Rapids, the City of Eden Prairie, the City of Minneapolis, the City of Minnetonka, the City of Plymouth, the City of St. Paul, and the City of Woodbury – pledge the following:

- That, in light of the release of HUD’s Affirmatively Furthering Fair Housing (AFFH) rule on July 16, 2015 and the new data analysis tools made available thereunder, members of the FHIC will conduct an addendum to the existing Analysis of Impediments (herein, “AI”) informed by the instructions and tools provided with the new rule (including the Assessment Tool for local governments published December 31, 2015, the HUD AFFH Data and Mapping tool, and AFFH Rule Guidebook), to be completed by April 15, 2017;
- That such addendum to the existing AI will consider, both regionally and specific to each jurisdiction, the fair housing issues of segregation, racially or ethnically concentrated areas of poverty, access to opportunity and disproportionate housing needs (as defined in the rule and Assessment Tool), and will consider, in particular, the distribution of affordable housing resources in the region;
- That the process for completing the addendum to the existing AI will provide for robust community participation;
- That the AI process will seek to develop innovative regional strategies that may serve as best practices for entitlement communities going forward.

Date:

Signed:
