

Minnesota Attorney General: Administrative Rules Proceedings

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Version 3
August 20, 2018

Our File #531

RULES REVIEW CHECKLIST

DATE RULES RECEIVED 8-6-79 Temporary Rule _____

Resubmitted and Received _____

DUE DATE 8-26-79

a. Returned to Agency w/o filing w/Secy of State _____
b. Approved _____ Date Sent Back to Agency _____

- -

1. Rules as Adopted ✓
2. Rules as Proposed ✓
3. Certificate of Board's Authorizing Resolution, where applicable ✓ we have to xerox
4. Order for Hearing ✓
5. Notice of Hearing ✓
   (i) Sufficiency ✓
6. Secretary of State's List ✓
7. Certificate of Acquisition of Secretary of State's List ✓
8. Affidavit of Mailing ✓
   (i) At least 30 days prior to hearing ✓
9. Statement of Need and Evidence ✓
10. Hearing Examiner's Report ✓
11. Agency's Findings of Fact ✓
12. Certificate of Board's Resolution Adopting Rules, where applicable ✓
13. Order Adopting ✓
14. Report of Chief Hearing Examiner ✓ we have to xerox
    (i) Finding of No Substantial Change ✓
    (ii) Permission to Incorporate by Reference, where applicable N/A
15. Certificate of Compliance with Rulemaking Procedures — MUST GET OK ✓
16. Copy of Notice of Intent to Solicit Outside Opinion, where applicable N/A
17. Petition by Public, where applicable N/A.

Minnesota Housing Finance Agency

Proposed Rules Covering Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes

12 MCAR § 3.002 O. "Persons and Families of Low and Moderate Income" means:

1. with respect to Limited-Unit Mortgage Loans pursuant to Chapter Four of these Rules, Development Cost Loans pursuant to Chapter Three of these Rules, Planning Grants pursuant to Chapter Five of these Rules, and American Indian Housing Loans pursuant to Chapter Eight of these Rules, which loans and grants are intended for a Limited-Unit Development, or a dwelling unit in a planned unit development or a condominium, those persons and families whose Adjusted Income does not exceed ~~$16,000~~ $19,000 in the metropolitan area as defined in Minn. Stat. § 473.121, subd. 2 and $17,500 in the remainder of the state or such lower amount as shall be required to assure that the interest on obligations of the Agency will be exempt from federal income taxation; and

12 MCAR § 3.034 Occupancy. Initial occupancy in Multi-Unit Developments financed by the Agency shall be limited to Persons and Families of Low and Moderate Income; provided however, that

A. to the extent necessary to avoid economic loss resulting from inability to achieve full occupancy, and

B. in order to encourage economic integration,

a Housing Sponsor may, with the prior written approval of the Executive Director, permit initial occupancy of up to 25% of the units in the housing project by persons and families who are not Persons and Families of Low and Moderate Income. Preference for occupancy in Multi-Unit Developments financed by the Agency may not be given to persons and families by virtue of their prior residence in the community in which the development is located; except that the Housing Sponsor may, with the prior written approval of the Executive Director allow preference for persons and families

displaced by public action or natural disaster or for previous residents of a rehabilitated Multi-Unit Development financed by the Agency.

12 MCAR § 3.062 Eligible recipients of rehabilitation grants. In addition to all conditions imposed by the Act, an application for a rehabilitation grant shall satisfy the following requirements:

A. The recipient(s) must occupy the structure to be improved as the recipient's(s') principal place of residence and individually or in the aggregate have at least

1. a life estate or

2. a one-third interest in the fee title or in the contract for deed with respect to such structure. The Agency may waive or modify the ownership and security requirement when necessary to permit rehabilitation grants for structures located on Indian Reservations. For mobile homes taxed as personal property or not permanently affixed to real property recipient(s) must: (1) have resided in the structure at the present location for a period of one year immediately preceding the date of application as the recipient(s') principal place of residence, (2) be current in any loan payments on the structure, and (3) individually or in the aggregate have a 100% interest in the title to the mobile home.

B. For the purpose of complying with the ownership requirements, the recipient may aggregate his interest in such property with the ownership interests of other individuals also occupying the property as their principal place of residence. All individuals occupying the structure to be improved as their principal place of residence and having an ownership interest in such structure must join in the application.

C. Each recipient must be a Person or Family of Low or Moderate Income as defined in 12 MCAR § 3.002 0. 3.

D. "Assets" for purposes of the Home Improvement Grant Program shall be the sum of the following, after deducting any outstanding indebtedness:

1. cash on hand or in checking or savings accounts;

2. securities or U. S. Savings Bonds;

3. market value of all interests in real estate (exclusive of the structure to be improved and a parcel of real property of not more than two acres on which such structure is located);

4. cash value of life insurance policies; and

5. all other property, exclusive of household furnishings, clothing, and one automobile.

12 MCAR § 3.065 Eligible properties. Grant funds shall be used only to improve properties which meet the following criteria:

A. The property shall be located within the State of Minnesota, be used primarily for residential purposes, and contain no more than two dwelling units, one of them owner-occupied.

B. The property to be improved shall conform to applicable zoning ordinances and possess all appropriate use permits.

C. The improvements shall be made upon or in connection with existing ~~permanent~~ structures~~.~~, including ~~M~~mobile homes. ~~or T~~Trailers shall not be eligible.

D. No property shall be eligible for a Home Improvement Grant if it has been improved by such a grant within the five year period next preceding the date on which application for such grant is made, except in extraordinary circumstances relating to damage to the property as a result of events beyond the control of the applicant or to failure of plumbing, heating, or electrical systems, as determined by the Agency in its sole discretion.

E. The property to be improved with grant funds shall be reasonably

efficient with respect to energy consumption. Where the property is not reasonably efficient with respect to energy consumption, rehabilitation funds shall be used to the extent necessary to increase such efficiency. Energy saving features shall include, but not be limited to, installation or upgrading of ceiling, wall, floor, and duct installation, storm windows and doors, and caulking and weather stripping. Energy saving features shall be consistent with the energy standards promulgated as part of the State Building Code but such improvements need not bring the housing into full compliance with such energy standards.

12 MCAR § 3.066 Eligible improvements. Improvements made with Home Improvement Grant funds shall satisfy the following requirements:

A. Each improvement shall be a permanent general improvement. Permanent general improvements shall include additions, alterations, renovations, or repairs upon or in connection with existing structures, which correct defects or deficiencies in the property affecting directly the safety, habitability, or energy usage of the property. Permanent general improvements shall be economically viable in terms of a determination that

1. the structure will have a reasonable life expectancy after the improvement is made, and

2. the structure will be reasonably livable, safe, and habitable after the improvement is made.

Permanent general improvements shall not include materials, fixtures, or landscaping of a type or quality exceeding that customarily used in the locality for decent, safe, and sanitary properties of the same general type as the property to be improved.

B. Each improvement shall be made in compliance with all applicable health, fire prevention, building, and housing codes and standards; provided, however, that no application for a Home Improvement Grant shall be denied solely because the improvements will not bring such property into full compliance with all such codes and standards.

C. Home Improvement Grant funds shall not be used for the payment, wholly or in part, of assessments for public improvements; provided, however, that such funds may be used for that portion of improvements located on the property which will bring an individual water supply system or a sewage disposal system (including septic systems) into compliance with local, state, or federal environmental and sanitary standards.

D. All contracts covering all or any portion of an improvement shall contain an Agency approved warranty of workmanship and materials.

E. No grant funds shall be used for the purpose of refinancing or paying off existing indebtedness. All such funds shall be used to finance improvements begun after application for such funds has been approved.

F. For mobile homes taxed as personal property or not permanently affixed to real property eligible improvements shall be limited to the following:

1. Improvements which bring the property into compliance with current standards for energy efficiency, fire safety and anchoring systems.

2. Improvements to remedy imminent safety hazards, or accessibility modifications, but only upon prior written approval by the Agency.

3. Other permanent general improvements, but only upon prior written approval by the Agency and a determination that after completion of such improvements the mobile home will comply with the standards set forth in Paragraph 1.

APPROVED AS TO FORM AND LEGALITY

AUG 23 1979

_____ 19____

WARREN SPANNAUS, ATTORNEY GENERAL

BY Joann Hinderaker

SPECIAL ASSISTANT ATTORNEY GENERAL

STATE OF MINNESOTA
DEPARTMENT OF STATE
FILED
AUG 23 1979
Joan Anderson Growe
Secretary of State
1:50 PM

RULES AS ADOPTED

CHANGES FROM THE RULES AS PROPOSED ARE UNDERLINED IN RED

Minnesota Housing Finance Agency

Proposed Rules Covering Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes

12 MCAR § 3.002 O. "Persons and Families of Low and Moderate Income" means:

1. with respect to Limited-Unit Mortgage Loans pursuant to Chapter Four of these Rules, Development Cost Loans pursuant to Chapter Three of these Rules, Planning Grants pursuant to Chapter Five of these Rules, and American Indian Housing Loans pursuant to Chapter Eight of these Rules, which loans and grants are intended for a Limited-Unit Development, or a dwelling unit in a planned unit development or a condominium, those persons and families whose Adjusted Income does not exceed ~~$16,000~~ $19,000 in the metropolitan area as defined in Minn. Stat. § 473.121, subd. 2 and $17,500 in the remainder of the state or such lower amount as shall be required to assure that the interest on obligations of the Agency will be exempt from federal income taxation; and

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1. a life estate or

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with respect to such structure. The Agency may waive or modify the ownership and security requirement when necessary to permit rehabilitation grants for structures located on Indian Reservations. For mobile homes taxed as personal property or not permanently affixed to real property recipient(s) must: (1) have resided in the structure at the present location for a period of one year immediately preceding the date of application as the recipient(s') principal place of residence, (2) be current in any loan payments on the structure, and (3) individually or in the aggregate have a 100% interest in the title to the mobile home.

B. For the purpose of complying with the ownership requirements, the recipient may aggregate his interest in such property with the ownership interests of other individuals also occupying the property as their principal place of residence. All individuals occupying the structure to be improved as their principal place of residence and having an ownership interest in such structure must join in the application.

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3. market value of all interests in real estate (exclusive of the structure to be improved and a parcel of real property of not more than two acres on which such structure is located);

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B. The property to be improved shall conform to applicable zoning ordinances and possess all appropriate use permits.

C. The improvements shall be made upon or in connection with existing ~~permanent~~ structures, including ~~M~~mobile homes. ~~or T~~Trailers shall not be eligible.

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E. The property to be improved with grant funds shall be reasonably

efficient with respect to energy consumption. Where the property is not reasonably efficient with respect to energy consumption, rehabilitation funds shall be used to the extent necessary to increase such efficiency. Energy saving features shall include, but not be limited to, installation or upgrading of ceiling, wall, floor, and duct installation, storm windows and doors, and caulking and weather stripping. Energy saving features shall be consistent with the energy standards promulgated as part of the State Building Code but such improvements need not bring the housing into full compliance with such energy standards.

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MINNESOTA HOUSING FINANCE AGENCY

RECEIVED
APR 13 1979
OFFICE OF HEARING EXAMINERS

In the Matter of the Proposed Adoption of Rules of the Minnesota Housing Finance Agency Governing Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes

NOTICE OF HEARING

NOTICE is hereby given that a public hearing will be held in the above entitled matter in the Capitol Square Building, Conference Room A, 550 Cedar Street, St. Paul, Minnesota, 55101, on Thursday, May 10, 1979, commencing at 9:00 a.m. and continuing until all interested or affected persons have had an opportunity to participate.

All representatives of associations or other interested groups and all interested or affected persons will have an opportunity to be heard concerning the adoption of the proposed rules captioned above by submitting either oral or written data, statements or arguments. Statements or briefs may be submitted by mail without personally appearing at the hearing to Mr. Harry Seymour Crump, Hearing Examiner, at Room 300, 1745 University Avenue, St. Paul, Minnesota, 55104, telephone (612) 296-8111. For those wishing to submit written statements or exhibits, it is requested that at least three (3) copies be furnished. In addition, it is suggested to save time and avoid duplication, that those persons, organizations or associations having a common viewpoint or interest in these proceedings join together where possible and present a single statement on behalf of such interests. All such statements will be entered into and become part of the record. The conduct of the hearing will be governed by the rules of the Office of Hearing Examiners.

Notice is hereby given that 25 days prior to the hearing a statement of need and reasonableness will be available for review at the Agency and at the Office of Hearing Examiners. This statement of need and reasonableness will include a summary of all of the evidence which will be presented by the Agency at the hearing, justifying both the need for and the reasonableness of the proposed rules. Copies of the statement of need and reasonableness may be obtained from the Office of Hearing Examiners at a minimal charge.

After the public hearing, written material may be submitted to the Hearing Examiner and recorded in the hearing record for five working days, or for a longer period not to exceed 20 calendar days if so ordered by the hearing examiner.

NOTICE: Any person may request notification of the date on which the hearing examiner's report will be available, after which date the Agency may not take any final action on the rules for a period of five working days. Any person may request notification of the date on which the hearing record has been submitted (or resubmitted) to the Attorney General by the Agency. If you desire to be so

notified, you may so indicate at the hearing. After the hearing you may request notification by sending a written request to the hearing examiner (in the case of the hearing examiner's report) or to the Agency (in the case of the Agency's submission or resubmission to the Attorney General).

The Agency proposes to adopt rules of the Minnesota Housing Finance Agency Governing Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes. NOTICE: The proposed rules are subject to change as a result of the rule hearing process. The Agency therefore strongly urges those who are potentially affected in any manner by the substance of the proposed rules to participate in the rule hearing process.

A copy of the proposed rules is attached hereto. One free copy may be obtained by writing to the Executive Director, Minnesota Housing Finance Agency, 333 Sibley Street, St. Paul, Minnesota, 55101. Additional copies will be available at the door on the date of the hearing.

The Agency's statutory authority to promulgate the proposed rules is contained in Minnesota Stat. §§ 462A.03, Subdivision 10, 462A.06, Subdivision 11 (1978).

Under Minnesota Statutes, § 10A.01, Subdivision 11, as amended by Laws of Minnesota 1978, Chapter 463, § 11, a lobbyist must register with the State Ethical Practices Board within five (5) days after he commences lobbying. According to the statute:

"Lobbyist" means any individual:

(a) Engaged for pay or other consideration, or authorized by another individual or association to spend money, who spends more than five hours in any month or more than $250, not including his own travel expenses and membership dues, in any year, for the purpose of attempting to influence legislative or administrative action by communicating or urging others to communicate with public officials; or

(b) Who spends more than $250, not including his own traveling expenses and membership dues, in any year for the purpose of attempting to influence legislative or administrative action by communicating or urging others to communicate with public officials.

"Lobbyist" does not include any:

(a) Public official or employee of the state or any of its political subdivisions or public bodies acting in his official capacity:

(b) Party or his representative appearing in a proceeding before a state board, commission or agency of the executive branch unless the board, commission or agency is taking administrative action;

(c) Individual whole engaged in selling goods or services to be paid for by public funds;

(d) News media or their employees or agents while engaged in the publishing or broadcasting of news items, editorial comments or paid advertisements which directly or indirectly urge official action;

(e) Paid expert witness whose testimony is requested by the body before which he is appearing, but only to the extent of preparing or delivering testimony; or

(f) Stockholder of a family farm corporation as defined in section 500.24, subdivision 1, who does not spend over $250, excluding his own travel expenses, in any year in communicating with public officials.

Questions regarding only lobbying should be directed to the State Ethical Practices Board, Room 41, State Office Building, Wabasha Street, St. Paul, Minnesota, 55155; telephone (612) 296-5615.

MINNESOTA HOUSING FINANCE AGENCY

Date March 15, 1979

JAMES J. SOLEM, Executive Director

Minnesota Housing Finance Agency

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3. Other permanent general improvements, but only upon prior written approval by the Agency and a determination that after completion of such improvements the mobile home will comply with the standards set forth in Paragraph 1.

RECEIPT

RECEIVED OF the Minnesota Housing Finance Agency this _____ day of August, 1979, the following items with respect to the Proposed Adoption of Rules of the Minnesota Housing Finance Agency Governing Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes:

Rules as Adopted.

One Copy of the Rules as Adopted showing changes from Rules as Proposed.

Rules as Proposed.

Order of Hearing.

Notice of Hearing.

Secretary of State's List.

Affidavit of Mailing.

Statement of Need.

Order Adopting Rules and Findings of Fact.

The record of the Rules Hearing as kept by the Hearing Examiner.

OFFICE OF THE ATTORNEY GENERAL

By: _____

RECEIVED
MAR 20 19
OFFICE OF HEARING
EXAMINERS

MINNESOTA HOUSING FINANCE AGENCY
333 Sibley
St. Paul, Minnesota 55101

RESOLUTION NO. MHFA 79-9

RESOLUTION AUTHORIZING PUBLIC HEARING ON
PROPOSED RULES

BE IT RESOLVED BY THE MINNESOTA HOUSING FINANCE AGENCY:

That James J. Solem, the Executive Director of the Minnesota Housing Finance Agency, be and he hereby is authorized and directed (1) to call a hearing for the purpose of promulgating rules of the Minnesota Housing Finance Agency, relating to Income Limits, Residential Preference for Multi-Unit Developments and the Home Improvement Grants for Mobile Homes; (2) to arrange for a hearing examiner to act as presiding officer at said hearing; and (3) to perform all other acts incidental to such hearing including without limitation signing an Order of Hearing and Notice of Hearing.

Adopted by the Minnesota Housing Finance Agency this 14th day of March, 1979.

By Demetrius G. Jelatis
Chairman

Attest: Arthur E Sidner
Vice Chairman

RECEIVED
MAR 20 19
OFFICE OF HEARING
EXAMINERS

CERTIFICATE OF BOARD'S
AUTHORIZING RESOLUTION

I, Arthur Sidner, do hereby certify that I am Vice Chairman of the Minnesota Housing Finance Agency, a board duly authorized under the laws of the State of Minnesota, and that the following is a true, complete, and correct copy of a resolution adopted at a meeting of the Minnesota Housing Finance Agency Board duly and properly called and held on the 14th day of March, 19 79; that a quorum was present at said meeting; that a majority of those present voted for the resolution; that said resolution is set forth in the minutes of said meeting and has not been rescinded or modified.

BE IT RESOLVED BY THE MINNESOTA HOUSING FINANCE AGENCY:

That James J. Solem, the Executive Director of the Minnesota Housing Finance Agency, be and he hereby is authorized and directed (1) to call a hearing for the purpose of promulgating rules of the Minnesota Housing Finance Agency, relating to Income Limits, Residential Preference for Multi-Unit Developments and the Home Improvement Grants for Mobile Homes; (2) to arrange for a hearing examiner to act as presiding officer at said hearing; and (3) to perform all other acts incidental to such hearing including without limitation signing an Order of Hearing and Notice of Hearing.

IN WITNESS WHEREOF, I have hereunto subscribed my name this 16th day of March, 19 79.

Arthur E. Sidner
Vice Chairman

Demetrius G. Jelatis
Attest by one other officer

HFA-79-002-HC

STATE OF MINNESOTA
OFFICE OF HEARING EXAMINERS

FOR THE MINNESOTA HOUSING FINANCE AGENCY

IN THE MATTER OF THE PROPOSED ADOPTION OF RULES OF THE MINNESOTA HOUSING FINANCE AGENCY GOVERNING INCOME LIMITS, RESIDENTIAL PREFERENCE FOR MULTI-UNIT DEVELOPMENTS AND HOME IMPROVEMENT GRANTS FOR MOBILE HOMES.

REPORT OF THE CHIEF HEARING EXAMINER

WHEREAS, a hearing was held on May 10, 1979, before Harry Seymour Crump, a Hearing Examiner of the State Office of Hearing Examiners, on the above-entitled matter in compliance with Minn. Stat. § 15.0412, Subd. 4; and

WHEREAS, the Report of Hearing Examiner made pursuant to Minn. Stat. § 15.052, Subd. 3, was issued to the Housing Finance Agency on June 29, 1979; and

WHEREAS, the Housing Finance Agency has now determined to adopt rules pursuant to Minn. Stat. § 15.0412, Subd. 4; and

WHEREAS, the Housing Finance Agency has submitted said rules to the Chief Hearing Examiner for review pursuant to Minn. Stat. § 15.052, Subd. 4, and 9 MCAR § 2.110; and

WHEREAS, the Chief Hearing Examiner finds that the final proposed rules are not substantially different from those proposed at the public hearing and that the Housing Finance Agency has met all requirements of Minn. Stat. § 15.0412, Subd. 4.

NOW, THEREFORE, upon receipt of this Report, the Agency has the responsibility of submitting the complete hearing record and the rules as adopted by the Agency to the Attorney General, notifying all persons who requested to be informed that the hearing record has been submitted to the Attorney General, and publishing in the State Register, all pursuant to Minn. Stat. § 15.0412, Subd. 4.

Dated this 3rd day of August, 1979.

Duane R. Harves

DUANE R. HARVES
Chief Hearing Examiner

Our File: 531

James E. Dinerstein
Special Assistant
Attorney General

August 23, 1979

Joanne E. Hinderaker

In the Matter of the Proposed Adoption of Rules of the Minnesota Housing Finance Agency Governing Income Limits, Residential Preference For Multi-Unit Developments and Home Improvement Grants For Mobile Homes.

minnesota housing finance agency

August 6, 1979

The Honorable Warren Spannaus
Attorney General of Minnesota
Room 102 - Capitol Building
Aurora Avenue
St. Paul, Minnesota 55155

RE: In the Matter of the Proposed Adoption of Rules of the Minnesota Housing Finance Agency Governing Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes

Dear Mr. Spannaus:

Enclosed please find for your review pursuant to Minnesota Statutes Section 15.0412, Subdivision 4 the proposed rules of the Minnesota Housing Finance Agency.

The following materials are submitted to you for your review pursuant to Atty. Gen. 302:

- Rules as Adopted.
- One copy of the Rules as Adopted showing changes from Rules as Proposed.
- Rules as Proposed.
- Order of Hearing.
- Notice of Hearing.
- Secretary of State's List.
- Affidavit of Mailing.
- Statement of Need.
- Order Adopting Rules and Findings of Fact.
- The record of the Rules Hearing as kept by the Hearing Examiner.

Sincerely,

James J. Solem
Executive Director

/klf
Encl.

333 sibley - suite 200 - saint paul, minnesota 55101 - (612) 296-7608

AN EQUAL OPPORTUNITY EMPLOYER

Exhibit H-3

MINNESOTA HOUSING FINANCE AGENCY

PROPOSED RULES COVERING INCOME LIMITS, RESIDENTIAL PREFERENCE FOR MULTI-UNIT DEVELOPMENTS AND HOME IMPROVEMENT GRANTS FOR MOBILE HOMES

STATEMENT OF COMPLIANCE WITH
MANUAL OF RULE MAKING PROCEDURES

I, Special Assistant Attorney General James E. Dinerstein, do hereby declare that I have examined the proposed rules and all related documents and that, based on them and my personal familiarity with the applicable procedures, the Manual of Rule Making Procedures has been followed. Any exceptions are noted below.

James E. Dinerstein
Special Assistant Attorney General

Dated: August 21, 1979

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STATE OF MINNESOTA

MINNESOTA HOUSING FINANCE AGENCY

In the Matter of the Proposed Adoption of Rules of the Minnesota Housing Finance Agency Governing Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes

STATEMENT OF NEED AND REASONABLENESS

The above captioned rules are amendments to existing rules of the Minnesota Housing Finance Agency. The rules are 1) a proposed amendment to 12 MCAR § 3.002 O. (1) increasing the adjusted income limits for Agency single family mortgage programs, 2) a proposed amendment to 12 MCAR § 3.034 prohibiting preferences in occupancy for multi-unit developments except in certain cases, and 3) proposed amendments to 12 MCAR §§ 3.062, 3.065, and 3.066 to permit Home Improvement Grants for mobile homes.

The need to amend this rule and the reasonableness of these amendments are as follows.

MINNESOTA HOUSING FINANCE AGENCY

By: James J. Solem
Executive Director

Dated: April 11, 1979

State of Minnesota
Minnesota Housing Finance Agency

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In the Matter of the Proposed Adoption of Rules of the Minnesota Housing Finance Agency Governing Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes

Statement of Need and Reasonableness

12 MCAR § 3.002(O)(1)

Minnesota Statutes § 462A.03, subd. 10 requires that the Minnesota Housing Finance Agency establish in its rules income limits for the purpose of defining persons and families of low and moderate income. This is accomplished in two Agency rules. 12 MCAR § 3.002(O) establishes maximum limits for adjusted income. Adjusted income is, in turn, determined pursuant to a formula set forth in the definition in 12 MCAR § 3.002(N). The adjusted income limits for single family mortgage programs have remained at $16,000 since 1975. Some modifications to the formula in 12 MCAR § 3.002(N) were made in 1977.

The proposed rule increases the adjusted income limits for Agency single family mortgage programs to $17,500 outstate and $19,000 in the metropolitan area. By its terms, the rule applies to programs for three types of housing: limited unit developments, dwelling units in a planned unit development and condominiums. The term "limited unit development" refers to new or existing residential housing intended for occupancy by a person or family of low or moderate income and by not more than five other families. See 12 MCAR § 3.002(V).

It is necessary to increase the income limits for Agency single family mortgage programs because house prices have increased substantially and there has been a rise in interest rates, both of which affect the purchasing power of families in Minnesota. The analysis of the data available to the Agency has led to a separate income limit for the seven county metropolitan area and for outstate Minnesota. The Agency has established a dual income limit because the data show a variation in incomes and house prices sufficient that any single limit would be either too high in the outstate area or too low in the metropolitan area.

There are four criteria specified in Minnesota Statutes § 462A.03, subd. 10 for determination of persons and families of low and moderate income. They are: (a) the amount of total income of such persons and families available for housing needs, (b) the size of the family, (c) the cost and condition of housing facilities available, (d) the eligibility of such persons and families to compete successfully in the normal housing market and to pay the amount at which private enterprise is providing sanitary, decent and safe housing. These criteria will be reviewed in more detail below.

The first criterion listed in § 462A, subd. 10 is "the amount of toal income of such persons and families available for housing needs". The general underwriting

standard in the mortgage loan industry is that the estimated monthly mortgage payment for a person or family for principal, interest, taxes, and insurance may not exceed 25 percent of their gross monthly income. The data in the analysis below uses this formula when determining the housing which can be afforded by persons and families with specific incomes.

The second criterion listed in the statutory definition of persons and families of low and moderate income is the size of the family. This factor is addressed by the Agency in the formula for adjusted income under 12 MCAR § 3.002(N), which is not the subject of amendment of this rule hearing. The Agency Board did, however, take the income adjustments in 12 MCAR § 3.002(N) into account in the analysis leading to a determination that the rule establishing income levels needed to be amended. The typical household receiving a home mortgage loan under the existing MHFA program consists of two adults and one child. Under 12 MCAR § 3.002(N), such a household receives a $750 deduction from gross income for each adult ($1,500) plus $500 for the child, totaling $2,000. Throughout this statement of need and reasonableness both the gross income and adjusted income will be given, although it is the level of adjusted income which is being set in the amended rule. The difference between the two figures will always be $2,000 for the purposes of all the analyses below.

The third factor specified in the statute is the cost and condition of housing facilities available. Table 1 shows the median sales prices of all the year-round residential structures sold in 1976 and projected into 1978. It is quite evident that median sales prices have increased significantly. The estimated price increase, including the adjustment factor, was 26 percent in the seven county metropolitan area and 27 percent in the balance of the state of Minnesota. Given the rate of inflation in housing prices (averaged at 16 percent between 1977 and 1978), it is a virtual certainty that median house prices will be even higher by the end of 1979. The effect that this increase has had on the pool of eligible households will be analyzed in the discussion of the fourth factor below.

Table 1

Median House Prices - 1976 to 1978

	1976[1]	1978[2]	Percent Change 1976 to 1978
Seven County Metropolitan Area	$37,800	$47,560	26%
Balance of State	$28,721	$36,566	27%

Sources: Certificate of Real Estate Value, Minnesota Department of Revenue, 1976, 1977.

Consumer Price Index, U. S. Department of Labor, Bureau of Labor Statistics.

[1]These figures are derived from Certificate of Real Estate Value data for all year-round residential structures sold in the years shown.

[2]These figures are estimated using actual data for 1977 and an adjustment factor of 16.0% to arrive at the 1978 figure. This adjustment factor is equal to the difference between the Consumer Price Index homeownership component for December of 1977 and December of 1978. This adjustment method assumes a uniform inflation rate in all regions of the state.

The fourth factor specified in Minnesota Statutes Section 462A.03, Subd. 10 is the ability of the persons and families to compete successfully in the normal housing market. In order to consider this criterion it is necessary to look at the relationships among the first three factors, and, in addition, look at current conditions in the private mortgage market.

Table 2 shows the relationship between gross income and the maximum house price a household with a given income can afford. Assumptions are made about down payment amounts, mortgage terms and several other factors. These are spelled out in the notes accompanying the table. This table shows clearly what percent of all sales in 1976 and 1978 were affordable by households of varying incomes at varying rates of interest.

Column (1) shows gross incomes and adjusted gross incomes assuming an average $2,000 deduction.

Column (2) takes into account the rate of interest on mortgage loans made by the Agency. The mortgage purchase program obtains the funds which it uses for loans from the sale of bonds. These bonds are sold in the bond market, and the rate of interest of the bonds will depend on market conditions at the time of sale. The Agency lends money at a rate of interest equal to the rate on the bonds plus an amount, somewhat under 1 percent, to cover the costs of the program. Column (2) compares four interest rates. Six and three-quarters percent is the rate currently in effect for the Home-ownership Mortgage Program. Current and projected market conditions indicate that there is little likelihood that this rate can be duplicated for the next series of bonds. Eight percent is the estimate of the most likely rate of interest for the Agency program under current market conditions. The rate of 8.50 percent assumes a more pessimistic view of the bond market. Ten and one-half percent is the current interest rate for private lenders pursuant to the usury law, Minnesota Statutes Section 47.20.

Column (3) shows the maximum house price (not mortgage amount) which a household can afford by spending no more than 25 percent of its income for housing expenses (mortgage principle, interest, taxes and insurance).

Finally, column (4) shows the estimated percent of all houses sold in 1976 and 1978 that were priced at or below the maximum affordable levels indicated in column (3).

Table 2 demonstrates the ability of households to afford safe, decent and sanitary housing in the private market and under the MHFA program at various income levels. The income limits set forth in this rule recognize the need to focus assistance on low and moderate income households and assure an adequate supply of decent housing for purchase under the program.

At the income level under the current rule ($16,000), the pool of available housing has been significantly reduced in the period between 1976 and 1978. Even without the change in interest rates resulting from present market conditions, the eligible pool of houses is reduced by 28 percent (69 percent to 50 percent) in the metropolitan area and 12 percent (85 percent to 75 percent) outstate.

There has been a similar decline in the ability of persons and families under the current income guidelines to obtain housing with private financing. The chart shows a reduction of 49 percent (35 percent to 18 percent) in the metropolitan area and 23 percent (64 percent to 39 percent) outstate. In fact the chart understates the decline in availability of conventionally financed housing. The data uses the

same interest rate for 1976 and 1978 (10.5 percent). However, the conventional loan rate in December 1976 was 8.75 percent. The actual decline then is closer to 65 percent in the metropolitan area and 35 percent outstate.

The second major change in the rule is to establish different income limits for outstate Minnesota and the Twin Cities area. The proposed rule amendment raises the adjusted income limits to $17,500 outstate and $19,000 in the metropolitan area. The two limits were established because the data show a variation in incomes and house prices sufficient that any single limit would be too low in one area or too high in the other. The division is a natural one in that there is a significant variation in the data for the metropolitan area and outstate Minnesota, and because the population of the two areas is roughly equal. While any rule which makes distinctions along geographic lines (i.e. metropolitan and outstate) may cause some hardship in individual cases, any more complex split would be administratively unworkable.

For the metropolitan area, the pool of eligible housing would remain virtually the same, with the income adjustment and the 6.75 percent interest rate (69 percent in 1976 to 70 percent in 1978). With the projected increase in interest rate there will be a reduction in the available pool to 58 percent. While the definition of -

While the definition of "persons and families of low and moderate income" in the statute says to consider house prices, its principle focus is income. The proposed $19,000 limit is 108 percent of the 1978 median income in the metropolitan area (based upon an analysis of data from Minnesota Department of Revenue Circuit Breaker Reports). The proposed limit maintains an acceptable pool of qualifying households and available housing. Under the proposed income limits eligible persons and families would find only 37 percent of the housing in 1978 at or below the maximum price they could afford at the private market interest rate of 10.5 percent.

The proposed income limit for outstate Minnesota would result in a slight reduction in the pool of eligible housing with an interest rate of 6.75 percent (85 percent to 80 percent) and causes a slightly greater reduction at the interest rate of 8.0 percent (to 76 percent). The outstate income limit of $17,500 is 132 percent of the 1978 median income. The income limit for outstate Minnesota is higher than that for the metropolitan area in terms of percentage of median income and the available pool of housing. The primary reason for this is that while sales of used housing show a great variation in price between metropolitan and nonmetropolitan areas, there is little variation in the price of newly constructed housing (although lot prices may vary). One of the purposes of the Minnesota Housing Finance Agency, as stated in Minnesota Statutes Section 462A.02, is to remedy the shortage of housing for persons and families of low and moderate income and "to encourage such construction in the areas of need and demand with a reasonable balance between non-metropolitan and metropolitan areas of the state . . ." Minnesota Statutes Section 462A.02, Subdivision 6. The income limit for outstate Minnesota has been set at a level which would allow those persons at the upper end of eligible income to afford modest, newly constructed housing. A second reason for the slightly higher relative income limit outstate is to recognize that the outstate area contains some smaller metropolitan areas where prices and incomes may be higher than the balance of the area.

It is not possible to determine from the available data the nature of the differences which may exist between smaller urban areas and the surrounding regions. The higher relative limit outstate will help to minimize the cases of individual hardship which might be caused by a split income level.

TABLE 2

THE PERCENT OF HOUSE SALES AT OR BELOW THE MAXIMUM AFFORDABLE HOUSE PRICE FOR HOUSEHOLDS WITH VARYING ANNUAL INCOMES

(1) Annual Income	(2) Interest Rates %	(3) Maximum Affordable House	(4) Percent of Homes That Sold at or Below the Maximum Affordable Price In 1976 (actual) and 1978 (estimated)			
			Metropolitan Area		Balance of State	
			1976	1978	1976	1978
Adjusted Income $16,000 (Gross Income $18,000)	6.75	$44,000	69	50	85	75
	8.00	40,200	60	35	81	64
	8.50	38,750	52	28	76	59
	10.50	34,000	35	18	64	49
Adjusted Income $17,500 (Gross Income $19,500)	6.75	47,600	76	63	90	80
	8.00	43,500	66	53	84	76
	8.50	42,000	63	38	82	68
	10.50	36,800	44	28	70	59
Adjusted Income $19,000 (Gross Income $21,000)	6.75	51,400	82	70	94	84
	8.00	46,900	75	58	89	79
	8.50	45,300	73	54	88	75
	10.50	39,600	59	37	79	66

Source: Certificate of Real Estate Value, Department of Revenue, 1976, 1977.

AN EXPLANATION OF THE COLUMNS IN TABLE 2

(1) Gross annual income is all household income, from all sources, and before taxes and withholding, of all residents of a housing unit. Current MHFA home mortgage programs

have adjusted gross incomes by deducting the following: $750 for each adult (maximum of 2) and $500 for each additional resident. An analysis of home mortgage loan recipients revealed that the typical household consisted of two adults and one child. A household consisting of 2 adults and 1 child with an annual income of $18,000 would have an adjusted income of $16,000. That same household with an annual income of $19,500 would have an adjusted income of $17,500. Finally, that same household with an annual income of $21,000 would have an adjusted income of $19,000.

(2) The mortgage interest rate in the current home mortgage program is 6.75. The two interest rates of 8.0 and 8.5 are likely mortgage interest rates for a home mortgage program that would begin this summer. These are tentative interest rates and they are based on the current municipal bond market.

(3) The house price levels in this column represent an estimation of the maximum affordable home for each combination of gross annual income and mortgage interest rate. Further, the estimated mortgage payment could not exceed 25% of the gross monthly income for each annual income level. These estimates were based on the following assumptions: (1) a 5% down payment (2) insurance and taxes were equal to 3% of the unpaid mortgage balance, annualized. These percentages are estimates and the actual percentages might vary. These percentages are based on the Department of Revenue 1977 Certificate of Real Estate value data (3) principal and interest (P & I) were obtained from the MHFA Factor Chart for computing P & I.

(4) In order to work with the Certificate of Real Estate Value data, a frequency distributio of sales prices was constructed (e.g. 0-$4,999, $5,000 - $9,999 and so on) for 1976. Because of this a method had to be devised to estimate the percentages of houses that sold at the maximum affordable price for each income level. These percentages were estimated using the following method. First, the appropriate house price range was divided into $1,000 intervals. Second, the actual percentage of house prices for a given range was divided by the absolute number of $1,000 intervals. Third, the number that was obtained in step two was multiplied by the number of $1,000 intervals below the cumulative percentage for that price range in which a given price fell. Fourth, the number obtained in step three was then subtracted from the cumulative percentage, to yield the estimated percentage of house prices at or below each of the house pricys in column three of Table 2. The 1978 percentages were estimated by assuming that the percent of change from 1977 to 1978 equaled the percent of change from 1976 to 1977.

12 MCAR § 3.034

The proposed rule adds a paragraph to 12 MCAR § 3.034 prohibiting preference for occupancy in Agency financed developments on the basis of prior residence in the community, except in specific cases. The current rule sets forth the occupancy requirements for Multi-Unit Developments financed by the Agency. The term "Multi-Unit Development" is defined in 12 MCAR § 3.002(U) as residential housing intended for occupancy for more than one family and the mortgagor of which is a nonprofit or limited dividend entity. The rule applies to the Agency's program for financing of multifamily rental housing.

The proposed rule is necessary because applications for loans have been submitted for projects in jurisdictions where local units have conditioned zoning approval upon some form of residential preference. The existing agency rule regarding civil rights, 12 MCAR § 3.012, is not sufficiently broad to cover residential preference.

The proposed rule makes specific the intent of the legislature embodied in Minnesota Statutes Section 462A.02 to establish a housing finance agency to benefit the people of the state of Minnesota. A program enacted to promote the health, welfare and property of the people of the entire state will have difficulty meeting its goal if individual communities in which projects are financed pursuant to this statewide program are allowed to impose restrictions limiting occupancy to residents of their community.

The residential preferences work their hardship in a slightly different manner in the metropolitan and outstate areas, but in either case they deny equal access to publicly subsidized housing. In the outstate area the Agency financed rental units are built in cities, but the project selection criteria include the need for housing in the geographical area in which the project is located (12 MCAR § 3.033(A)) and the plans of the regional development commission for the area in which the project is located (12 MCAR § 3.033(K)). If individual communities or projects were allowed to establish residential preferences, citizens who live in communities too small to provide the supporting services necessary to be selected for Agency Multi-Unit Loans and citizens who live outside of incorporated cities would be denied equal access to Agency financed housing.

The Twin Cities metropolitan area consists of a large number of cities, surrounded by a less fully developed area. Not all cities in the metropolitan area can expect to have MHFA financed developments within their jurisdiction. Residential preferences can serve to deny access to Agency financed developments for persons and families residing in cities or rural areas in the metropolitan area in which no developments are located. They also would serve as an exclusionary tool to prevent poor people and minorities from moving into certain cities.

There are three exceptions to the general rule which are authorized with the approval of the executive director of the Agency. The exception for persons and families displaced by public action or natural disaster allows a preference when there is a specific, legitimate need for a residential preference due to unusual circumstances beyond the control of the person or family. Minnesota Statutes

Section 462A.02, subdivision 1 expressly provides that it is a public purpose of the agency to remedy the shortage of housing as a result of public action.

The permissive preference for previous residents of a rehabilitated unit recognizes the need to minimize displacement of existing tenants when rehabilitation is carried out.

12 MCAR § 3.062

The Agency operates a Home Improvement Grant Program pursuant to Minnesota Statutes 1978, section 462A.05, Subdivision 15. The program is operated solely with funds appropriated by the Legislature in Laws 1976, Chapter 254 and Laws 1977, Chapter 401. Under the existing rules governing the Home Improvement Grant Program (12 MCAR §§ 3.061 to 3.069) mobile homes are not eligible properties for home improvement grants. The purpose of this proposed rule, and the proposed amendments to 12 MCAR §§ 3.065 and 3.066, is to allow home improvement grants to make improvements to mobile homes.

The Agency is making this change because mobile homes are a growing percentage of the State's housing stock, because mobile homes are occupied primarily by low income households, and because a significant portion of the mobile home stock occupied by low income persons may be deficient with respect to energy conservation, fire safety features or other aspects of general construction. Mobile homes fall within the definition of residential housing provided in Minnesota Statutes 1978, Section 462A.03, Subdivision 7.

§ 3.062(A) establishes the ownership requirements for eligible properties. Since the requirements established for real property are inapplicable to mobile homes, a new standard is necessary. The purpose of the requirements is to obtain security on the grants, which, pursuant to Minnesota Statutes, section 462A.21, subdivision 4a, must be subject to a repayment agreement. Because loans for the purchase of mobile homes are subject to high default rates, the residency requirement is added in an attempt to ensure that grants will be made to recipients who are likely to remain in their mobile homes over the term of the repayment agreement or financing statement. Those recipients who are current in their payments and have a reasonable "track record" are least likely to experience repossessions and the resultant defaults on repayment agreements which might be expected. The requirement that all applicants who have an interest in the property be made parties to the grant repayment agreement also adds necessary security for the Agency.

The rule refers to "mobile homes taxed as personal property or not permanently affixed to real property". No rule amendment is necessary for the Agency to make loans for "mobile homes" which are taxed as real property and permanently affixed to real property since these units are, in fact, no longer mobile homes. This is similar to the treatment provided by the Federal Government under the FHA Title I Home Improvement Loan Program. See U. S. Dept. of Housing and Urban Development Title I Property Improvement Loan Operating Handbook, Chapter 1, section 1.7(a)(11)(p. 1-6), June, 1973.

12 MCAR § 3.065

The current rule requires improvements to be made on existing "permanent" structures, and makes mobile homes ineligible. Since mobile homes are not permanent structures, this language must be deleted to allow them to be eligible for the program. In addition, the prohibition on their eligibility must be deleted. It is replaced with a specific reference to their eligibility.

12 MCAR § 3.066

This rule sets forth the eligible improvements under the Home Improvement Grant Program. Because mobile homes are not manufactured to the same standards as conventionally built housing, and because mobile homes are thus generally of lesser quality than similar conventional housing, it is felt that the proliferation of this type of housing should not be encouraged when other affordable options can be provided through public action. The public purpose is served, however, to the extent that low and moderate income residents of mobile homes are provided with opportunities for safe, healthy and reasonably energy efficient housing units. For this reason, grants are limited to those types of improvements which serve to maximize these objectives.

Because many existing mobile homes were built prior to adoption of current standards, the proposed rule allows improvements to bring the home into compliance with current standards for energy efficiency, fire safety and anchoring systems. 12 MCAR § 3.066(F)(I).

Improvements to remedy imminent safety hazards and accessibility modifications are eligible, but only as exceptions to the general policy and upon prior approval of the Agency. 12 MCAR § 3.066(F)(2). While the three items mentioned in paragraph (1) are the key safety areas requiring modification in many mobile homes, there may be other similar areas where grant funds could be used. Since the legislature has specifically set aside money for accessibility improvements, handicapped residents of mobile homes should also be eligible for such improvements.

The final paragraph of the proposed rule, 12 MCAR § 3.066(F)(3) recognizes that there may be some cases where other permanent general improvements to a mobile home may be necessary or desirable. "Permanent general improvement" is the term used to describe the improvements permissible for real property. See 12 MCAR § 3.066 (A). These types of improvements are permissible only if the mobile home already complies with the current standards for energy efficiency, fire safety, and anchoring systems or will be in compliance after the improvements financed with an Agency grant have been completed. Again, because this is to be an exception to the general rule, prior approval of the Agency is required.

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In the Matter of the Proposed Adoption of Rules of the Minnesota Housing Finance Agency Governing Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes

AGENCY RESPONSE TO MATERIALS SUBMITTED TO THE HEARING EXAMINER

The following is the Minnesota Housing Finance Agency response to the materials submitted to the hearing examiner in the above-entitled rules hearing.

12 MCAR Sections 3.062, 3.065 and 3.066

In the materials submitted, and in the record of the hearing there was no public opposition to the amendments to 12 MCAR Sections 3.062, 3.065 and 3.066, relating to Home Improvement Grants for Mobile Homes. Public Exhibit 3 b supports the rules and suggests prior approval of accessibility grants - a provision included in 12 MCAR Section 3.066 (F) (2). Public Exhibit #1 and the testimony of Nina Rothchild support the proposed rules.

12 MCAR Section 3.034

The only negative public testimony regarding the amendment to 12 MCAR 3.034, relating to preference in occupancy, was H.E. Exhibit #3, the letter from the City of Richfield. While the Agency appreciates the cooperation of local units of government referred to in the letter, there is nothing in the argument of the City of Richfield which rebuts the statement of need and reasonableness submitted by the Agency.

H.E. Exhibit #1.

The letter from the City of Robbinsdale, addresses income limits for the Home Improvement Grants Program. This income limit is not the subject of this rule hearing.

12 MCAR Section 3.002 (o) (i)

The remainder of the materials submitted to the hearing examiner apply to the amendment to 12 MCAR Section 3.002 (O) (1). None of the materials submitted provide any convincing arguments against the central reason for the need for the rules as stated in the Agency statement:

> "It is necessary to increase the income limits for Agency single family mortgage programs because house prices have increased substantially and there has been a rise in interest rates, both of which affect the purchasing power of families in Minnesota. The analysis of the data available to the Agency has led to a separate income limit for the seven county metropolitan area and for outstate Minnesota. The Agency has established a dual income limit because the data show a variation in incomes and house prices sufficient that any single limit would be either too high in the outstate area or too low in the metropolitan area."

In addition, they do not rebut the substantial evidence of the reasonableness of the proposed income limits as provided in the Agency statement.

Several of the arguments submitted against the proposed rules reflect a fundamental misconception about the nature of the Agency single family mortgage program.

While Minnesota Housing Finance Agency programs are for persons and families of low and moderate income, not all Agency programs are targeted to the same income groups. The Agency has sold almost $400 million dollars in bonds to finance about 1,000 federally subsidized apartment units targeted to low income families in which the tenants pay no more than 25% of their monthly income for rent. In addition, the Agency has administered $30,500,000 in State appropriated Home Improvement Grant Funds for low income persons and families with adjusted incomes of $5,000 or less.

The Agency single family mortgage program is designed for persons and families of moderate income, since that is the population which can afford to purchase housing. The Agency has a special program, the Homeownership Assistance Fund, funded with money appropriated by the legislature to assist those families at the lower end of moderate income. See 12 MCAR Sections 3.131 - 3.135.

The concerns raised in public Exhibits #1 and #2 that the income limits will not serve low income families are misplaced. The proposed rule does not apply to the Agency programs targeted for low income persons.

Public Exhibit #1 and the "Additional testimony of Nina Rothchild".

The primary problem with the materials submitted by Nina Rothchild is that it focuses only on incomes. Minnesota Statutes, Section 462A.03, Subd. 10 specifies four factors as set forth in the Agency statement of need. By focusing on incomes, the presentation misses the statutory requirement that the Agency look at income available for housing needs, the cost and condition of available housing, and the ability of the persons and families to compete in the private market.

By analyzing data contained in a report from the State Planning Agency entitled: Minnesota Household Characteristics 1977 Ms. Rothchild's testimony concludes that over 500,000 families are currently eligible for assistance under the program and that there is thus no need to increase the pool of eligible households. However, the testimony misstates the eligible pool.

In determining eligibility it is necessary to exclude from the eligible pool those households which cannot effectively participate in the program because they have incomes which are too low to qualify them for a mortgage. An analysis of past activity in the program reveals that the effective lower income limit is $8,000 gross income. Households which currently own their own homes, while technically eligible to participate in the program are not likely to do so. The major market for the program is thus comprised of eligible renters. Households headed by persons over age 62 are also very unlikely to participate in the program.

Given these three constraints, the effective market is not 698,000 households but is rather about 170,400 households* at the proposed income limits of $17,500 (Regions 1-10) and $19,000 (Region 11).

* Based upon data obtained from 1976 Income Adjusted Homestead Credit Returns filed with the Minnesota Department of Revenue and applied to Household Projections 1980 prepared by the Office of the State Demographer.

This pool of households is not excessive given the wide variability of house prices and incomes across the state. While some submarkets in the state may be characterized by an aburdance of eligible households, others may have very few.

The important factor to consider is not the pool of eligible households in and of itself, but rather the numbers and cost of units available to households eligible under the program. The number of housing units affordable by eligible households has fallen dramatically since income limits were most recently adjusted.

The Agency statement of need documented the dramatic decline in available housing affordable to eligible households. Since the preparation of the statement, the Agency has received the data for 1978 from the Certificate of Real Estate Value, Minnesota Department of Revenue, which allows the Agency to make a projection for 1979. The revised Table 2 (attached - pages 4 and 5) shows an even more dramatic reduction in affordable housing. With the 1979 data, the discussion at the bottom of page 3 of the statement of need and reasonableness would show that even without a change in interest rates, the eligible pool of housing is reduced by 68% (69% to 22%) in the metropolitan area and 29% (85% to 60%) outstate.

Similarly, the revised chart shows a decline in the ability of persons and families under current income guidelines to obtain housing with private financing. The revised chart shows a reduction of 80% (35% to 7%) in the metropolitan area and 39% (64% to 39%) outstate.

Page 4 of Public Exhibit #1 lists the "Recommendations" of the Council on the Economic Status of Women. These recommendations do not address the issue of adjusted gross income. Recommendations 1A, 1B, 1C, and 1D would be appropriate factors for consideration at the time the Agency amends the rule providing for adjustments to gross income (12 MCAR Section 3.002 (N)). Recommendation #2 on page 5 is addressed to the legislature.

Public Exhibit #2 and the Letter from Lawrence H. Kruse
Dated May 22, 1979

(1) Mr. Kruse raises a number of points in his presentation to which the Agency would like to respond. Before examining each of Mr. Kruse's contentions, a few observations about the survey upon which he bases his argument are necessary.

Mr. Kruse's survey results cannot be considered reliable or representative of MHFA program activity as a whole. The method used to collect the data submitted by Mr. Kruse to the Hearing Examiner is contrary to generally accepted research standards. The survey methodology was flawed in the following manner:

(a) lenders were not sampled in a random fashion. Lack of random sampling allows bias to enter into survey results which limits the degree to which findings can be generalized to a larger population;

(b) the sample was selected from a rather small subset of all lenders participating in the program. Mr. Kruse surveyed only from among savings and loan associations, which comprise less than ten percent of all lenders who participate in the program;

REVISED

TABLE 2

THE PERCENT OF HOUSE SALES AT OR BELOW THE MAXIMUM AFFORDABLE HOUSE PRICE FOR HOUSEHOLDS WITH VARYING ANNUAL INCOMES

(1) Annual Income	(2) Interest Rates %	(3) Maximum Affordable House	Percent of Homes That Sold at or Below the Maximum Affordable Price In 1978 (actual) and 1979 (estimated)			
			Metropolitan Area		Balance of State	
			1976	1979	1976	1979
Adjusted Income $16,000 (Gross Income $18,000)	6.75	$44,000	69	22	85	60
	8.00	40,200	60	16	81	55
	8.50	38,750	52	13	76	52
	10.50	34,000	35	7	64	39
Adjusted Income $17,500 (Gross Income $19,500)	6.75	47,600	76	33	90	68
	8.00	43,500	66	22	84	60
	8.50	42,000	63	18	82	57
	10.50	36,800	44	8	70	44
Adjusted Income $19,000 (Gross Income $21,000)	6.75	51,400	82	46	94	76
	8.00	46,900	75	29	89	67
	8.50	45,300	73	27	88	66
	10.50	39,600	59	14	79	52

Source: Certificate of Real Estate Value, Department of Revenue, 1976, 1978.

AN EXPLANATION OF THE COLUMNS IN TABLE 2

(1) Gross annual income is all household income, from all sources, and before taxes and withholding, of all residents of a housing unit. Current MHFA home mortgage programs

have adjusted gross incomes by deducting the following: $750 for each adult (maximum of 2) and $500 for each additional resident. An analysis of home mortgage loan recipients revealed that the typical household consisted of two adults and one child. A household consisting of 2 adults and 1 child with an annual income of $18,000 would have an adjusted income of $16,000. That same household with an annual income of $19,500 would have an adjusted income of $17,500. Finally, that same household with an annual income of $21,000 would have an adjusted income of $19,000.

(2) The mortgage interest rate in the current home mortgage program is 6.75. The two interest rates of 8.0 and 8.5 are likely mortgage interest rates for a home mortgage program that would begin this summer. These are tentative interest rates and they are based on the current municipal bond market.

(3) The house price levels in this column represent an estimation of the maximum affordable home for each combination of gross annual income and mortgage interest rate. Further, the estimated mortgage payment could not exceed 25% of the gross monthly income for each annual income level. These estimates were based on the following assumptions: (1) a 5% down payment (2) insurance and taxes were equal to 3% of the unpaid mortgage balance, annualized. These percentages are estimates and the actual percentages might vary. These percentages are based on the Department of Revenue 1977 Certificate of Real Estate Value data (3) principal and interest (P & I) were obtained from the MHFA Factor Chart for computing P & I.

(4) In order to work with the Certificate of Real Estate Value data, a frequency distribution of sales prices was constructed (e.g. 0-$4,999, $5,000-$9,999 and so on) for 1976. Because of this a method had to be devised to estimate the percentages of houses that sold at the maximum affordable price for each income level. These percentages were estimated using the following method. First, the appropriate house price range was divided into $1,000 intervals. Second, the actual percentage of house prices for a given range was divided by the absolute number of $1,000 intervals. Third, the number that was obtained in step two was multiplied by the number of $1,000 intervals below the cumulative percentage for that price range in which a given price fell. Fourth, the number obtained in step three was then subtracted from the cumulative percentage, to yield the estimated percentage of house prices at or below each of the house prices in column three of Table 2. The 1979 percentages were estimated by assuming that the percent of change from 1978 to 1979 equaled the percent of change from 1977 to 1978.

(c) statistics used to describe the findings of the survey were not presented in a generally accepted manner. No overall mean (arithmetic average) income was presented. In addition, no information was given about the distribution of reported cases with respect to the mean.

For these reasons, the findings from the survey cannot be generalized to the Affordable Homeownership Program as a whole.

(2) The presentation states that a majority of the funds provided under the Homeownership Program is not used to provide assistance to low income families. As discussed above, this program is not designed to serve low income families.

(3) The presentation asserts high income limits established for the current program allow a substantial portion of funds to go to persons and families who already own adequate housing. Mr. Kruse bases his argument upon the data included in his presentation which, as stated earlier, is not representative or reliable.

(4) The presentation states that a substantial amount of funds have gone to households which could have afforded and been eligible for a home at market interest rates. This contention is also unsupported. Mr. Kruse supports his argument by making a comparison of mean conventional mortgage amounts in 1978 reported in Banking Bulleton No. 2061 for MHFA and private lenders. Mr. Kruse contends that there is only a modest difference between the MHFA mean and the private lender average. This 9% difference is offered as evidence that MHFA is serving substantially the same market as is the private sector.

The evidence offered by Mr. Kruse is flawed, however, in that it ignores the two features of the MHFA program which provide assistance to the recipient of the loan: - lower interest rates and reduced down payment amounts. Together these two factors prevent the Agency programs from being in competition with private lenders.

(a) A reduction in interest rate reduces the income required to support a given mortgage amount. MHFA's interest rate has consistently been between two to three points below the market rate of interest. This interest reduction allows the Agency to serve a lower income market than can be served by lenders in the private sector.

(b) The large down payment required for most market rate conventional loans means that the size of the mortgage is significantly lower than the cost of the housing, and the purchaser must have the financial resources to come up with the down payment. Most MHFA loans are made with down payments of five percent. In fact, less than one percent of all MHFA loans are uninsured conventional mortgages, which require large down payments (25% of the value of the property). The same is not the case in the private market, however, where down payments on uninsured conventional mortgages may range as high as 40% of value. This variation in down payments limits the comparability of MHFA versus private market mortgage amounts.

(5) Mr. Kruse asserts that the data submitted in the statement of need and reasonableness are misleading when they compare adjusted gross incomes to median incomes.

There are two reasons why adjusted income figures were used rather than gross incomes. The first, and most evident, is that 12 MCAR Section 3.002 (o) establishes adjusted incomes, and not gross incomes. It is not misleading to compare adjusted gross income to median income for the year in which the current limits were set and do the same for the proposed limits.

The second reason is similar to the reason that the income limit set by the Agency is an adjusted and not a gross income. Gross incomes do not consider the family size adjustments in 12 MCAR Section 3.002 (n). Because there will be sizable variations in actual gross income based upon family size or other factors considered in 12 MCAR Section 3.002 (n) a uniform adjusted gross income is used for purposes of comparison.

(6) Mr. Kruse asserts that there is no need to have 59% of households qualify for the program in the metropolitan area and 73% of the households qualify in the balance of the state.

This is essentially the same argument put forth by Nina Rothchild in her testimony. The Agency's position is thus contained in the response to that testimony. It should again be noted that the Agency took into account not only incomes, but all of the factors listed in Minnesota Statutes Section 462A.03, Subd. 10. The Agency's analysis and its need to develop limits which are applicable over widely varying geographic regions requires that income limits be established at a level which will allow the program to function statewide.

In addition, the new data available in the revised chart (attached pages 4 and 5) shows a reduction in the eligible pool as discussed on page 4 of the statement of need.

(7) Mr. Kruse asserts that even assuming a 13% inflation rate there would still be enough units available at affordable prices in 1979 for financing under the current income limit at the maximum affordable price as outlined in Table 2 of the statement of need and reasonableness. Because we now have the 1979 data available, a review of the revised Table 2 will show a shortage of available housing of the current income limits, particularly in the metropolitan area.

Both Mr. Kruse and the MHFA have limited data upon which to make assumptions about the quality of existing housing in various parts of the state. It is reasonable to assume, however, that housing of very low value is deficient or substandard in some respects. The Agency has not been able to estimate the percentage of houses sold in each region which is deteriorated or dilapidated.

It is therefore assumed that a percentage of the available housing in a region is substandard and is not decent, safe or sanitary as the Agency's legislation requires. Given this assumption, there are probably even fewer decent, safe and sanitary housing units available at affordable prices than the estimates in Table 2 would indicate. For this reason, it is necessary to raise income limits in order to increase the supply of decent housing available for purchase under the program.

(8) Mr. Kruse asserts that MHFA could reduce its interest rate further than the anticipated 8 to 8.5% by reducing the operating costs of the Agency. Under bond resolutions, and official statements issued as a part of a bond issuance, the Agency is obligated to build reserve funds as protection against potential losses. The reserve funds established by the Agency are thus necessary and legitimate expenses which cannot be foregone to reduce interest rates for the Homeownership Program.

(9) In his supplemental letter, Mr. Kruse contends that a household with a gross income of $18,000 can afford a house priced at $45,000. While it is conceivable that individual households may be able to afford houses priced at levels higher than the Agency has estimated in Table 2 of the statement of need and reasonableness, it should be kept in mind that the examples used are specific only to the city of Wells, Minnesota. Taxes and insurance rates vary widely around the state making it very difficult for similar households in other areas of the state to afford such a house without making down payments in excess of 5%. The Agency does not wish to preclude first-time homebuyers from being able to participate in its program. Because first-time homebuyers rarely have sufficient savings to make large down payments, the Agency recognizes a need to increase income limits somewhat to maximize both goals of serving first time homebuyers and of making the financing of newly constructed houses feasible.

H.E. Exhibit #2

The Arrowhead Economic Opportunity Agency recommends that the MHFA establish one statewide income limit at $19,000 adjusted gross annual income. It further recommends that multi-family development programs and rehabilitation programs sponsored by the Agency be made available to persons and families outside of metropolitan statistical areas.

With respect to the recommendation for a statewide income limit equal to that proposed for the Metropolitan Area (Region 11), the MHFA has thoroughly analyzed data on both incomes and house sales prices in various regions of the state. The Agency has found that Region 11 has a median income and a median house sales price which are significantly higher than corresponding medians in all other regions. The median income in Region 11 in 1978 was $17,529 while the median income in Region 3 (the region in which the Arrowhead Economic Opportunity Agency is located) was $14,497 in 1978. The median house sales prices in 1978 in the respective regions were $48,850 for Region 11 and $32,000 for Region 3. These great differences have led the Agency to establish a differential income limit to more closely reflect the differences in medians between Region 11 and the balance of the state. Uniformly high income limits in regions such as Region 3 would make persons and families eligible whose incomes drastically exceed the median in their region.

The AEOA also recommends that multi-family and rehabilitation plans and programs be made available outside of metropolitan statistical areas. This comment is unrelated to the proposed changes in income limits. It is the policy of the MHFA, however, to make its plans and programs available on a statewide basis.

H.E. Exhibit #4

The letter from Mary Durward of the Arrowhead Regional Development Commission raises questions about the procedure followed in the hearing. The hearing complied with all requirements of the Administrative Procedures Act.

Additional Letters

The Agency has attached the following letters which were sent to the Agency following the hearing:

Letter from Roger L. Helm, Northwestern Bank Northwest, dated May 24, 1979

Letter from W. E. Guenther, Community State Bank, dated May 21, 1979

The two letters support the proposed rules for revised income limits.

Date: May 30, 1979

James J. Solem, Executive Director

STATE OF MINNESOTA

MINNESOTA HOUSING FINANCE AGENCY

IN THE MATTER OF THE PROPOSED ADOPTION OF RULES OF THE MINNESOTA HOUSING FINANCE AGENCY) GOVERNING INCOME LIMITS, RESIDENTIAL PREFERENCE FOR MULTI-UNIT DEVELOPMENTS AND HOME IMPROVEMENT GRANTS FOR MOBILE HOMES.	Resolution No. MHFA 79-31 RESOLUTION ADOPTING REPORT OF HEARING EXAMINER AND RULES

WHEREAS, pursuant to Board Resolution No. MHFA 79-9 of March 14, 1979, the Executive Director was authorized to call a public hearing on the above-entitled proposed rules which were presented to the Board on that date; and

WHEREAS, the above-entitled matter having come on for hearing before Harry S. Crump, Hearing Examiner of the State of Minnesota on May 10, 1979, at the Capitol Square Building, St. Paul, Minnesota after proper notice required by Minn. Stat. §15.0412 was served upon all persons, associations, and other interested groups registered with the Secretary of State for that purpose; and

WHEREAS, on June 29, 1979, after consideration of the proposed rules and the evidence presented in writing and at the public hearing, the Hearing Examiner issued a report, attached hereto as Exhibit 1, approving the rules and amendments as proposed by the Agency at the hearing, but with the recommendation that an additional clause be added at the end of proposed Rule 12 MCAR §3.002(O)(1), relating to income limits, to read as follows:

> Or, in the case of persons or families to whom loans are made or who occupy a development financed from the proceeds of bonds of the Agency, such lower amount as shall be required to assure that the interest on such bonds would be exempt from federal income taxation, under federal laws and regulations thereunder which, at the date of the issuance of the bonds, are in effect by the Congress or promulgation by the Internal Revenue Service.

and

WHEREAS, the Board agrees with the nature of the recommendation of the Hearing Examiner, but finds the suggested language inappropriate;

NOW THEREFORE, having afforded interested persons an opportunity to present written and oral data, statements, and arguments, having considered all of the testimony and evidence contained in the records, files, and proceedings herein, and applicable statutory standards and criteria, and having confirmed the need for the above-captioned rules,

IT IS HEREBY RESOLVED BY THE MINNESOTA HOUSING FINANCE AGENCY:

1. that the findings of fact, conclusions and recommendations of the Hearing Examiner dated June 29, 1979 be and they hereby are adopted, except for the Hearing Examiner's suggested language for 12 MCAR §3.002(O)(1); and

2. that the rules attached hereto as Exhibit 2 and incorporated herein by this reference as if fully set forth herein be and hereby are adopted; and

3. that the Executive Director of the Minnesota Housing Finance Agency, be and he hereby is authorized and directed to present these rules as adopted to the Chief Hearing Examiner and to the Attorney General for review and approval pursuant to Minn. Stat. §15.0412; to arrange at the appropriate time for the publication of these rules in the State Register; and to perform all other acts necessary to the promulgation of said rules.

Adopted by the Minnesota Housing Finance Agency this 26 day of July, 1979.

Attest: _____
Secretary

By Demetrius G. Jelatis
Chairman

STATE OF MINNESOTA

MINNESOTA HOUSING FINANCE AGENCY

IN THE MATTER OF THE PROPOSED ADOPTION OF RULES OF THE MINNESOTA HOUSING FINANCE AGENCY GOVERNING INCOME LIMITS, RESIDENTIAL PREFERENCE FOR MULTI-UNIT DEVELOPMENTS AND HOME IMPROVEMENT GRANTS FOR MOBILE HOMES.	CERTIFICATE OF RESOLUTION OF THE MINNESOTA HOUSING FINANCE AGENCY

The undersigned hereby certifies that he is the Secretary of the Minnesota Housing Finance Agency, an Agency duly authorized under the laws of the State of Minnesota; that the resolution attached hereto as Exhibit A is a true, complete and correct copy of a resolution adopted at a meeting of the Minnesota Housing Finance Agency duly and properly called and held on the 26th day of July, 1979; that a quorum was present at said meeting; that a majority of those present voted in favor of the adoption of said resolution; that said resolution has not been altered, modified, or annulled and remains in full force and effect.

IN WITNESS WHEREOF, I have hereunto subscribed by name this 26 day of July, 1979.

ATTEST:

Member

Secretary

Member

EXHIBIT 1

STATE OF MINNESOTA
OFFICE OF HEARING EXAMINERS

FOR THE MINNESOTA HOUSING FINANCE AGENCY

In the Matter of the Proposed Adoption of Rules of the Minnesota Housing Finance Agency Governing Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes.

REPORT OF THE HEARING EXAMINER

The above-entitled matter came on for hearing before Harry Seymour Crump, Hearing Examiner from the State Office of Hearing Examiners, on May 10, 1979, in the Capitol Square Building, St. Paul, Minnesota.

James E. Dinerstein, Special Assistant Attorney General, appeared as counsel on behalf of the Minnesota Housing Finance Agency (MHFA). The following persons appeared and testified on behalf of the MHFA: Riva Lee, Director of Research and Information; Gail L. Vetter, Director of Home Improvement and Mortgage Programs; Frank Altman, Research Coordinator; Mary Tingerthal, Manager, Home Improvement Programs; and Robert Odman, Housing Management Supervisor.

Four public witnesses appeared and three spoke at the hearing.

Pursuant to Minn. Stat. Sec. 15.0412, subd. 4, this Report shall be available for review to all affected individuals upon request for at least five working days before the agency takes any final action on the rule.

Thereafter, the Agency shall, if it proposes to adopt the rules as originally proposed or amended, submit a copy of the Order Adopting Rules, a copy of any additional agency findings, a copy of the rules as originally proposed, and a copy of the rules as adopted to the Chief Hearing Examiner for review pursuant to Minn. Stat. Sec. 15.052, subd. 4. The submission to the Chief Hearing Examiner shall precede review by the Attorney General. The Chief Hearing Examiner shall complete his review and submit his report to the Agency on the issues of substantial changes in the rule and compliance with Minn. Stat. Sec. 15.0412 within ten calendar days. The Agency will be responsible for

filing the rules with the Attorney General and for notifying persons who have indicated that they wish to be notified of such filing.

Based upon all the records and proceedings herein, the Examiner makes the following:

FINDINGS OF FACT

1. On March 15, 1979, the Agency filed the following documents with the Chief Hearing Examiner:

(a) A copy of the proposed rules.
(b) The Order for Hearing proposed to be issued.
(c) The Notice of Hearing proposed to be issued.
(d) A Statement of the number of persons expected to attend the hearing and estimated length of the Agency's presentation.

2. On March 20, 1979, the Agency filed the following documents:

(a) The Board's Resolution Authorizing Public Hearing on Proposed Rules; and
(b) The Certificate of the Board's Authorizing Resolution.

3. On April 9, 1979, a Notice of Hearing and a copy of the proposed rules were published at 3 State Register 1873.

4. On April 5, 1979, the Agency mailed the Notice of Hearing to all persons and associations who had registered such notice, as well as all present members of the Minnesota Legislature.

5. On April 13, 1979, the Agency filed the following documents:

(a) The Order for Hearing.
(b) The Notice of Hearing as mailed.
(c) The Affidavit of Receipt of the Secretary of State's list.
(d) The Affidavit of Mailing the Notice to all persons on the Secretary of State's list.
(e) The Secretary of State's Certificate and list.
(f) The Statement of Need and Reasonableness.
(g) The names of Agency personnel who will represent the Agency at the hearing.

The documents were available for inspection at the Office of Hearing Examiners from the date of filing to the date of the hearing.

6. The record remained open through May 30, 1979, for the receipt of written comments and statements, the period having been extended by order of the Hearing Examiner to 20 calendar days following the hearing.

7. The Department cited Minn. Stat. Sec. 462A.03, subd. 10 and Sec. 462A.06, subd. 11 (1978) as its statutory authority to promulgate the proposed rules. Minn. Stat. Sec. 462A.06, subd. 11 (1978), entitled the "General Powers of the Agency",

reads as follows:

> It may make and publish rules and regulations respecting its mortgage lending, construction lending, rehabilitation lending, grants, and temporary lending, and any such other rules and regulations as are necessary to effectuate its corporate purpose.

12 MCAR SECTION 3.002 (O) (1)

8. This proposed rule establishes the maximum limits for adjusted income of persons and families of low and moderate income participating in the affordable mortgage programs. The proposed rule to this section increases the adjusted income limits for Agency single family mortgage programs to $17,500 outstate and $19,000 in the metropolitan area. It's necessary to increase the income limits for Agency single family mortgage program because house prices have increased substantially and there has been a rise in interest rates both of which affect the purchasing power of families in Minnesota. The median sale prices of all the year-round residential structures had an estimated price increase of 26 percent in the seven county metropolitan area and 27 percent in the outstate area since 1976. Based on the rate of inflation of 16 percent between 1977 and 1978 it is estimated that the median house prices will be even higher by the end of 1979. The Agency contended that the impact of this increase on the pool of eligible households under the current $16,000 level will significantly reduce the pool of affordable, safe, decent and sanitary housing at various income levels. Even without the change in interest rates resulting from present market conditions, the eligible pool of housing is reduced by 28 percent in the metropolitan area and 12 percent outstate between 1977 and 1978.

The purpose of the affordable mortgage program is to assist low and moderate income families who would not otherwise be able to afford conventional financing to purchase a home. Since 1973 MHFA has administered approximately 9,000 loans totaling 300 million dollars. The funds for this program are raised by the sale of tax exempt revenue bonds. The interest rate charged to borrowers in the program is related to the interest rate at which the bonds are sold on the market. The current interest rate is 6 and 3/4 percent. It's anticipated that for the next phase of the program the interest rate will be approximately 8 to 8 and 1/2 percent.

The main advantage of this program to the borrowers is that the interest rate on the MHFA loans is lower than the interest rate charged by conventional lenders. The current interest rate on a conventional loan is approximately 10 and 1/2 percent. The FHA's Statement of Need and Reasonableness is adopted in regard to the impact of the projected increase in interest rate on the market and the justification for the differential of income limits for outstate Minnesota to the metropolitan area. See also Chart No. 2 of the Statement of Need and Reasonableness.

9. Nina Rothchild, Executive Director, Council on the Economic Status of Women, testified at the hearing in opposition to raising the adjusted income level of eligibility above the $16,000 per year limit. According to her survey, Ms. Rothchild calculated the number of families by income level for 1977 and found that under the current limitation of $16,000 per year there were a total of approximately 500,000 families, including approximately 63,000 female-headed families eligible, and under the $19,000 limitation approximately 700,000 families, including approximately 7,000 female-headed families eligible. These calculations were based on adjusted gross income. Ms. Rothchild concluded that the current pool of eligible families is sufficient for this program which serves about 9,000 families over a five year period. Ms. Rothchild states that the MHFA program could be more carefully targeted towards low income persons and single-parent families, those with the greatest needs.

Ms. Rothchild recommended the following:

(a) 10 percent of homeownership subsidies should be reserved for single-parent families. The Agency should monitor its progress in meeting this goal.

(b) MHFA homeownership programs should be more carefully targeted to first-time home buyers. Provisions should be made to ensure consideration of the special curcumstances of divorced heads of households. One method which should be considered is the inclusion of asset limitations in program eligibility guidelines.

(c) Income eligibility adjustments should be changed to widen the spread in proportion to family size.

(d) Eligibility guidelines should be developed to guarantee the benefits of home ownership programs to those most in need. In establishing measures of need, the Agency should consider income, marital status, presence of children, and previous homeownership.

Ms. Rothchild did, however, support the differential in income levels between the metropolitan and outstate areas.

10. Lawrence H. Kruse, President, Wells Federal Savings and Loans, Wells, Minnesota, and President of the Savings League of Minnesota, member of the advisory committee to the Minnesota Housing Finance Agency, and a member of the advisory subcommittee urged that the increase in income limitations be denied. Mr. Kruse presented several points which the Agency, in its posthearing comments, stated cannot be generalized to the affordable homeownership program as a whole. The points presented by Mr. Kruse were as follows:

(a) A majority of the funds under the single family home program are not used to provide financing for the low income family.

(b) By virtue of high income limitations under which the program has operated in the past, a substantial portion of the funds have gone to families who have adequate housing but use the subsidized mortgages to purchase higher priced homes based on want and desires rather than need.

(c) A substantial amount of funds have gone to families who could afford to obtain and who were eligible for financing at market rates. See Public Exhibit No. 2.

Mr. Kruse contended that the Legislature sincerely intended to help the low income and moderate income family and provide financing for those who cannot obtain it in the private marketplace. He concluded that there's a direct correlation between excessive high income and property price limitations and the failure of the program to effectively help those Minnesota families who were intended to be helped when the Legislature originally created the Agency.

Furthermore, Mr. Kruse stated that the real question is what is an income limitation that is needed to successfully implement the programs of the Housing Finance Agency. According to statistics contained in the Banking Division Bulletin 2061, issued by the Department of Commerce of the State of Minnesota on March 19, 1979, the total amount of conventional FHA and GI loans made to individuals secured by residential units and located in Minnesota was $3,109,619,586 in 1978. In the same year the total commitment under the single family homes program by the Minnesota Housing Finance Agency was $133 million, or less than

4 and 1/2 percent of the total processed. When the Agency is processing less than 4 and 1/2 percent of the loans in the State of Minnesota there is no need to have 59 percent of the families qualify incomewise in the metropolitan area and over 73 percent in the outstate area or 60 percent throughout the state.

Furthermore, Mr. Kruse contended that assuming there is an inflation rate of 13 percent in 1979 and assuming that it would cut the number of eligible units in half, there appears to be no question that there would still be sufficient units available at affordable prices for financing under the current income limits at the maximum afforded price as outlined in Table 2 of the Agency's Statement of Need and Reasonableness. Furthermore, Mr. Kruse states that there's a possibility the interest rates in the 1979 program will be 8 percent and if that is the case, then under the statistics of 1978, 35 percent and 64 percent of the units would be available in the metropolitan and outstate area respectively. Thus, there appears to be more homes qualifying than are needed to fill the program.

Furthermore, Mr. Kruse stated that one of the key factors in determining the number of units available is the interest rate. Based on the financial statement of the Minnesota Housing Finance Agency, the income or revenues over expenses for all the combined programs for the fiscal year ending June 30, 1978 increased to $9,291,670. Mr. Kruse realized that various reserve funds must be established but he suggests that the margin of operation could be reduced thereby lowering the interest charges on the home loans and thereby, again, making a larger percentage of the homes in the state available for financing at the same income level. Another alternative would be adopting a floating interest rate schedule in the single family home program similar to the home improvement program, whereby the lower income families receive lower interest rates.

Finally, Mr. Kruse stated that there is adequate housing available at a cost of under $44,500. In Mr. Kruse's posthearing comments he stressed that it is not necessary to have a new home to have safe, sanitary and adequate housing. More families would

be served under this program if more of the funds were used to buy good quality old homes. At the hearing he stated that if inflation should take a substantial jump it is possible that the building costs with the lower limitations might cause a shift in the use of these funds from new homes, where the majority of funds are placed at this time, to finance previously occupied residential units. Since loans on existing units tend to be smaller than on new homes the same amount of dollars would go to assist a larger number of families. See Mr. Kruse's posthearing comments in regard to the ability of families under the proposed income limits to finance new construction at a cost of $44,500.

11. Arthur B. Whitney, bond counsel to the Minnesota Housing Finance Agency, submitted the following posthearing comment. It was suggested that qualifications be made to the income limits established for the definition of persons and families of low and moderate income, immediately following the proposed form of 12 MCAR Sec. 3.002 (O) (1) as follows:

> Or, in the case of persons or families to whom loans are made or who occupy a development financed from the proceeds of bonds of the Agency, such low amount may be required to assure that the interest on such bonds would be exempt from federal income taxation, under federal laws and regulations thereunder which, at the date of the issuance of the bonds, are in effect or are proposed for enactment by the Congress or promulgation by the Internal Revenue Service.

The purpose is to assure that the interest on Agency's bonds will remain tax exempt, regardless of the wording finally adopted by H.R. 3712, introduced by Representative Al Ullman, Chariman of the House Ways and Means Committee, and now pending in Congress. Without the tax exemption it would be impossible to make loans at the low rates.

12. By posthearing comment, MHFA supported the comments of Mr. Whitney to amend the above proposed rule. The mortgage purchase program obtains funds which are used for mortgage loans from the sale of tax exempt bonds. The language suggested by Mr. Whitney will allow the Agency to use lower income limits if they are necessary in order to obtain tax exempt financing for the program, if the limits on adjusted income established under federal law applicable to this mortgage program were less

than those provided in the proposed rule. These rules must comply with the federal regulations. Furthermore, in the MHFA's posthearing comments, the Agency stated that the single family mortgage program is designed for persons and families of moderate income, since that is the population which can afford to purchase housing. The Agency has a special program, the homeownership assistance fund, funded with money appropriated by the Legislature to assist those families at the lower end of moderate income. See 12 MCAR Sec. 3.131-3.135.

In response to the comments by Ms. Rothchild and Mr. Kruse, the Agency stated that the proposed rules do not apply to the Agency programs targeted for low income persons. The agency stated in determining eligibility it is necessary to exclude from the eligibility pool those households which cannot effectively participate in the program because they have income which is too low to qualify them for a mortgage. An analysis of past activity in the program reveals that the effective lower income limit is $8,000 gross income. Households which currently own their own homes, while technically eligible to participate in the program are not likely to do so. The major market for the program is thus comprised of eligible renters; households headed by persons over age 62 are also very unlikely to participate in the program. Based on these contraints the effective market is 174,400 households at the proposed income limits of $17,500 and $19,000 for outstate and metropolitan area respectively.

The Agency stated that the important fact to consider is the number and costs of units available to households eligible under the program. It submitted a revised Table No. 2 showing a drastic reduction in affordable housing. Furthermore, the Agency stated that the findings of a survey of Mr. Kruse cannot be generalized to the affordable home mortgage program as a whole. In refuting Mr. Kruse's contentions that a substantial amount of funds have gone to households which could have afforded and been eligible for a home at market interest rates for the conventional lender, the Agency stated that Mr. Kruse's contentions ignore two features of the MHFA program which provide assistance to the recipients of the loan: low interest rates and lower down payment

amounts. These factors prevent the Agency programs from being in competition with private lenders.

Finally, in response to Mr. Kruse's contentions concerning the maximum affordable home of a household at the current adjusted income limits the Agency stated it recognizes a need to increase income limits somewhat to maximize both goals of serving first time home buyers and of making the financing of newly constructed houses feasible.

13. The following comments supported the proposed rule for revised income limits: Roger L. Helm, Assistant Vice President, Northwestern Bank Northwest; W. E. Guenther, President, Community State Bank; James W. Pellot, Executive Vice President, Northland Mortgage Company; and Mary O'Hara, Executive Director, Handicapped Housing Service.

14. The Arrowhead Economic Opportunity Agency in its prehearing comments recommended that the proposed adjusted gross income limitation of $19,000 be revised to apply to both the metropolitan and other local government units within the regional planning area.

15. The Hearing Examiner finds that this proposed amendment, as modified, is not unreasonable. The amendment to the proposed rule qualifying the income limits set forth sufficient criteria when lower income limits is required for the program to comply with state and federal regulations and statutes. The qualifying term "as are proposed for enactment" should be deleted as it is uncertain. The term "may" be required should be changed to "shall" be required. In addition, the qualification is not a delegation of authority. Although there were strong comments opposing the adoption of this rule, the need for the rule has been established by the Agency on the record, in its Statement of Need and Reasonableness and in its posthearing comments which are hereby adopted by reference by the Hearing Examiner. The amendment to the proposed rule would not appear to constitute a substantial change.

12 MCAR SECTION 3.034 - OCCUPANCY

16. This amendment deals with residential preference for occupancy in multi-unit developments financed by the Agency. The proposed amendment provides for three exceptions to the general rule which is authorized with the prior written approval of the executive director. By prehearing comment, Richard Krier,

AICP, planning and development director, City of Richfield, commented that the proposed prohibition against providing housing preference based on prior community residence will further limit the authority of the local governing bodies in regard to multi-unit developments. He concluded that the change may result in fewer local governments approving MHFA-financed developments within their jurisdiction. There were no other comments concerning this proposed amendment. The Examiner finds the proposed amendment necessary and reasonable for the reasons given in the Agency's Statement of Need and Reasonableness.

12 MCAR SECTION 3.062 - ELIGIBLE RECIPIENTS OF REHABILITATION GRANTS; 12 MCAR SECTION 3.065 - ELIGIBLE PROPERTIES; 12 MCAR SECTION 3.066 - ELIGIBLE IMPROVEMENTS.

17. These proposed amendments deal with home improvement grants to make improvements to mobile homes. 12 MCAR Sec. 3.065 was changed by deleting language to allow for the eligibility of mobile homes under the program. The proposed amendment would permit the Agency to include mobile homes that are taxed as personal property or not permanently affixed to real property to be eligible for the home improvement grants, and it states the condition under which such properties would be eligible. This program is restricted to persons or families with adjusted annual income of $5,000 or less. The funds may be used for basic improvements including more accessible to handicapped residents. The MHFA is treating mobile homes which are permanently affixed to real property similar to the treatment provided by the federal government under the FHA Title I Improvement Loan Program. See Agency's Exhibit No. 1. Mary O'Hara and Nina Rothchild spoke in support of these rules. Ms. Rothchild encouraged the use of mobile homes as a homeownership alternative for low income persons and single-parent families. Ms. O'Hara suggested prior approval of the accessibility grants. By prehearing comment, Donald Modeen, Jr., housing specialist, City of Robbinsdale, suggested that the income limit for the MHFA grant program be increased from $5,000 to $7,500. See Hearing Examiner's Exhibit No. 1. There were no comments in oppostion to these proposed amendments. The Hearing Examiner finds these proposed amendments and the deletion necessary

and reasonable for the reasons given in the Agency's Statement of Need and Reasonableness.

CONCLUSIONS

1. Due, timely and adequate notice of the hearing was properly served and published by the agency. All substantive and procedural requirements have been fulfilled.

2. The Agency has demonstrated its statutory authority to adopt the proposed rules.

3. The Agency has demonstrated the need for and reasonableness of the proposed rules and amendments, as modified, by an affirmative presentation of facts.

RECOMMENDATION

The Hearing Examiner recommends that the proposed rules, as modified, be adopted.

Dated this 29TH of June, 1979.

Harry Seymour Crump

HARRY SEYMOUR CRUMP
Hearing Examiner

EXHIBIT 2

Minnesota Housing Finance Agency

Proposed Rules Covering Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes

12 MCAR § 3.002 O. "Persons and Families of Low and Moderate Income" means:

1. with respect to Limited-Unit Mortgage Loans pursuant to Chapter Four of these Rules, Development Cost Loans pursuant to Chapter Three of these Rules, Planning Grants pursuant to Chapter Five of these Rules, and American Indian Housing Loans pursuant to Chapter Eight of these Rules, which loans and grants are intended for a Limited-Unit Development, or a dwelling unit in a planned unit development or a condominium, those persons and families whose Adjusted Income does not exceed ~~$16,000~~ $19,000 in the metropolitan area as defined in Minn. Stat. § 473.121, subd. 2 and $17,500 in the remainder of the state or such lower amount as shall be required to assure that the interest on obligations of the Agency will be exemot from federal income taxation; and

12 MCAR § 3.034 Occupancy. Initial occupancy in Multi-Unit Developments financed by the Agency shall be limited to Persons and Families of Low and Moderate Income; provided however, that

A. to the extent necessary to avoid economic loss resulting from inability to achieve full occupancy, and

B. in order to encourage economic integration,

a Housing Sponsor may, with the prior written approval of the Executive Director, permit initial occupancy of up to 25% of the units in the housing project by persons and families who are not Persons and Families of Low and Moderate Income. Preference for occupancy in Multi-Unit Developments financed by the Agency may not be given to persons and families by virtue of their prior residence in the community in which the development is located; except that the Housing Sponsor may, with the prior written approval of the Executive Director allow preference for persons and families

displaced by public action or natural disaster or for previous residents of a rehabilitated Multi-Unit Development financed by the Agency.

12 MCAR § 3.062 Eligible recipients of rehabilitation grants. In addition to all conditions imposed by the Act, an application for a rehabilitation grant shall satisfy the following requirements:

A. The recipient(s) must occupy the structure to be improved as the recipient's(s') principal place of residence and individually or in the aggregate have at least

1. a life estate or

2. a one-third interest in the fee title or in the contract for deed with respect to such structure. The Agency may waive or modify the ownership and security requirement when necessary to permit rehabilitation grants for structures located on Indian Reservations. For mobile homes taxed as personal property or not permanently affixed to real property recipient(s) must: (1) have resided in the structure at the present location for a period of one year immediately preceding the date of application as the recipient(s') principal place of residence, (2) be current in any loan payments on the structure, and (3) individually or in the aggregate have a 100% interest in the title to the mobile home.

B. For the purpose of complying with the ownership requirements, the recipient may aggregate his interest in such property with the ownership interests of other individuals also occupying the property as their principal place of residence. All individuals occupying the structure to be improved as their principal place of residence and having an ownership interest in such structure must join in the application.

C. Each recipient must be a Person or Family of Low or Moderate Income as defined in 12 MCAR § 3.002 O. 3.

D. "Assets" for purposes of the Home Improvement Grant Program shall be the sum of the following, after deducting any outstanding indebtedness:

1. cash on hand or in checking or savings accounts;

2. securities or U. S. Savings Bonds;

3. market value of all interests in real estate (exclusive of the structure to be improved and a parcel of real property of not more than two acres on which such structure is located);

4. cash value of life insurance policies; and

5. all other property, exclusive of household furnishings, clothing, and one automobile.

12 MCAR § 3.065 Eligible properties. Grant funds shall be used only to improve properties which meet the following criteria:

A. The property shall be located within the State of Minnesota, be used primarily for residential purposes, and contain no more than two dwelling units, one of them owner-occupied.

B. The property to be improved shall conform to applicable zoning ordinances and possess all appropriate use permits.

C. The improvements shall be made upon or in connection with existing ~~permanent~~ structures, including ~~M~~mobile homes. ~~or T~~Trailers shall not be eligible.

D. No property shall be eligible for a Home Improvement Grant if it has been improved by such a grant within the five year period next preceding the date on which application for such grant is made, except in extraordinary circumstances relating to damage to the property as a result of events beyond the control of the applicant or to failure of plumbing, heating, or electrical systems, as determined by the Agency in its sole discretion.

E. The property to be improved with grant funds shall be reasonably

efficient with respect to energy consumption. Where the property is not reasonably efficient with respect to energy consumption, rehabilitation funds shall be used to the extent necessary to increase such efficiency. Energy saving features shall include, but not be limited to, installation or upgrading of ceiling, wall, floor, and duct installation, storm windows and doors, and caulking and weather stripping. Energy saving features shall be consistent with the energy standards promulgated as part of the State Building Code but such improvements need not bring the housing into full compliance with such energy standards.

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A. Each improvement shall be a permanent general improvement. Permanent general improvements shall include additions, alterations, renovations, or repairs upon or in connection with existing structures, which correct defects or deficiencies in the property affecting directly the safety, habitability, or energy usage of the property. Permanent general improvements shall be economically viable in terms of a determination that

1. the structure will have a reasonable life expectancy after the improvement is made, and

2. the structure will be reasonably livable, safe, and habitable after the improvement is made.

Permanent general improvements shall not include materials, fixtures, or landscaping of a type or quality exceeding that customarily used in the locality for decent, safe, and sanitary properties of the same general type as the property to be improved.

B. Each improvement shall be made in compliance with all applicable health, fire prevention, building, and housing codes and standards; provided, however, that no application for a Home Improvement Grant shall be denied solely because the improvements will not bring such property into full compliance with all such codes and standards.

C. Home Improvement Grant funds shall not be used for the payment, wholly or in part, of assessments for public improvements; provided, however, that such funds may be used for that portion of improvements located on the property which will bring an individual water supply system or a sewage disposal system (including septic systems) into compliance with local, state, or federal environmental and sanitary standards.

D. All contracts covering all or any portion of an improvement shall contain an Agency approved warranty of workmanship and materials.

E. No grant funds shall be used for the purpose of refinancing or paying off existing indebtedness. All such funds shall be used to finance improvements begun after application for such funds has been approved.

F. For mobile homes taxed as personal property or not permanently affixed to real property eligible improvements shall be limited to the following:

1. Improvements which bring the property into compliance with current standards for energy efficiency, fire safety and anchoring systems.

2. Improvements to remedy imminent safety hazards, or accessibility modifications, but only upon prior written approval by the Agency.

3. Other permanent general improvements, but only upon prior written approval by the Agency and a determination that after completion of such improvements the mobile home will comply with the standards set forth in Paragraph 1.

Minnesota Housing Finance Agency

Proposed Rules Covering Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes

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STATE OF MINNESOTA
MINNESOTA HOUSING FINANCE AGENCY

ORDER FOR HEARING

RECEIVED
APR 13 1979
OFFICE OF HEARING
EXAMINERS

IN THE MATTER OF: The Proposed Adoption of Rules of the Minnesota Housing Finance Agency Governing Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes

IT IS HEREBY ORDERED that a public hearing on the above-captioned rules be held in the Capitol Square Building, Conference Room A, 550 Cedar Street, St. Paul, Minnesota, 55101, on Thursday, May 10, 1979, commencing at 9:00 a.m. and continuing until all persons have had an opportunity to be heard.

IT IS FURTHER ORDERED that a Notice of Hearing be mailed to all persons or representatives of associations or other interested groups who have registered their names with the Secretary of State for that purpose.

IT IS FURTHER ORDERED that the Notice of Hearing be published in the State Register.

STATE OF MINNESOTA
MINNESOTA HOUSING FINANCE AGENCY

Executive Director

Date: April 11, 1979

STATE OF MINNESOTA

COUNTY OF RAMSEY

In the Matter of the Proposed Adoption of Rules of the Minnesota Housing Finance Agency Governing Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes

CERTIFICATE

I hereby certify that the attached 2 sheets 588 labels constitute the complete list of persons, associations and other interested groups who as of 10:00 o'clock, A.M., this 26th day of March, 1979 have requested pursuant to Minnesota Statutes §15.0412, that their names be placed on file with the Secretary of State for the purpose of receiving notice of public hearings on proposed rules on the above-captioned subject.

Joan Anderson Growe
Secretary of State

By: Joan Anderson Growe

RECEIVED
APR 13 1979
OFFICE OF HEARING
EXAMINERS

AFFIDAVIT

The undersigned, being first duly sworn, on oath deposes and says:

1. That he is an employee of the Minnesota Housing Finance Agency.

2. That on the 26th day of March, 1979, he went to the office of the Secretary of State of the State of Minnesota and requested a current list of all representatives of associations or other interested groups of persons who had registered their names with the Secretary of State for the purpose of obtaining notices of public hearings relating to the promulgation of rules pursuant to Minnesota Statutes § 15.0412.

3. That on the 26th day of March, 1979, in response to the above request the Secretary of State provided him with such list, a copy of which is attached hereto and incorporated herein by this reference.

Further Affiant sayeth not.

Mike Kuschke
Mike Kuschke

Subscribed and sworn to before me
this 26th day of March, 1979.

Linda M. Kluwe
Notary Public

LINDA M. KLUWE
NOTARY PUBLIC — MINNESOTA
RAMSEY COUNTY
My Commission Expires Feb. 16, 1983

RECEIVED
APR 13 1979
OFFICE OF HEARING
EXAMINERS

STATE OF MINNESOTA

COUNTY OF RAMSEY

In the Matter of the Proposed Adoption of Rules of the Minnesota Housing Finance Agency Governing Income Limits, Residential Preference for Multi-Unit Developments and Home Improvement Grants for Mobile Homes

AFFIDAVIT OF MAILING

Bonnie Nelson, being first duly sworn, deposes and says:

That on the 5th day of ~~March~~ April, 1979, at the City of St. Paul, County of Ramsey, State of Minnesota, she served the attached Notice of Hearing by depositing in the United States mail at said City of St. Paul, a true and correct copy thereof, properly enveloped, with postage prepaid, to all persons and associations at the addresses listed on the attached Certificate of the Secretary of State as well as to all persons listed on the attached sheet as presently being members of the Minnesota Legislature.

Bonnie Nelson

Subscribed and sworn to before me this 5th day of ~~March~~ April, 1979.

Marcia J. Schoeneman
Notary Public

MARCIA J. SCHOENEMAN
NOTARY PUBLIC—MINNESOTA
HENNEPIN COUNTY
My Commission Expires Jan. 21, 1986

Bye, Larry L., 1575 Ames Avenue, St Paul 55106

ADDITIONAL NAMES FOR GENERAL MAILING LIST

Cohen, Lawrence 1291 1 Appletree Square, Minneapolis, Mn. 55420

Marquardt, Philip Route 2, Box 209 Janesville, Mn. 56048

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ADDRESS TEST ADDRESS
CITY TESTCITY MN
55555

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ALLIN M KARLS
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55414

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AM INST PROF GEOLOGISTS
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230 E SUPR ST
DULUTH MN
55102

ARNOLD ROBERT MESPA
41 SHERBURNE
ST PAUL MN
55103

ARROWHEAD REGIONAL DEV COMM
200 ARROWHEAD PLACE
DULUTH MN
55802

ASH GEORGE
3040 OTTAWA STREET
ST LOUIS PARK MN
55416

ASSN OF MINN COUNTIES
2305 FORD PKWY
ST PAUL MN
55116

ASSN RESIDENCES FOR RETARDED
459 RICE SUITE 301
ST PAUL MN
55103

TEST PATTERN TEST PATTERN
ADDRESS TEST ADDRESS
CITY TESTCITY MN
55555

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ADDRESS TEST ADDRESS
CITY TESTCITY MN
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AHOLA DEBRA
616 LINCOLN AVE APT 307
ST PAUL MN
55102

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366 JACKSON ST
ST PAUL MN
55101

ALLERS JOHN
1501 W 80TH ST SUITE210
BLOOMINGTON MN
55431

AMERICAN CAMPING ASSN
4132 88TH LANE
ST PAUL MN
55112

ANDERSON DEBRA
1115 E RIVER ROAD
MPLS MN
55414

ANDERSON HERBERT
418 8TH ST. SO.
VIRGINIA MN
55792

ANDERSON MARY
4425 RUTLEDGE AVE
EDINA MN
55436

ANDERSON STANFORD P
14600 MINNETONKA BLVD
MINNETONKA MN
55343

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VIRGINIA MN
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ARROWHEAD REG. DEV COMM.
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ST PAUL MN
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118 E MAIN ST
ANOKA MN
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BADALICH JOHN P
2025 THOMPSON AVE
SO ST PAUL MN
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1192 BUSH ST
ST PAUL MN
55106

BECK PAT
953 HYACINTH AVE
ST PAUL MN
55106

BEGALKA D REV
212 N ELK ST
BELLE PLAINE MN
56011

BERGSETH THOMAS
1011 NICOLLET MALL
MPLS MN
55403

BEST FLANAGAN ET AL
4040 IDS CENTER
MPLS MN
55402

BLOMQUIST BARRY L

NORTH BRANCH MN
55056

BLOOMINGTON CITY CLERK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

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2200 W 1ST NATL BK BLDG
ST PAUL MN
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BLOOMINGTON MN
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BROWN H D
4961 KINGSBERRY LANE
MINNETONKA MN
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BRUBACHER RICHARD COMM ADM
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CARLSON VERNE E
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1821 UNIV AVE SUITE 271
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CHRISTIANSEN FREDRIK
RM 505 CAPITOL SQ BLDG
ST PAUL MN
55155

CITIZENS LEAGUE
530 SYNDICATE BLDG
MPLS MN
55402

CITY OF ABERDEEN
CITY HALL
ABERDEEN SD
57401

BARRETT FRED
ST LOUIS CO COURT HOUSE
DULUTH MN

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2600 109 AVE N W
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55744

BREHL JAMES W
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BRICK PHILIP D
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BROOKS WILLIAM F JR
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GOODRIDGE MN
56725

BRUNING C.R.DEPT.CLINIC.EXP.
BURTON HALL
MPLS. MN
55455

BUSCH NOEL
SUITE 705 510 MARQUETTE
MPLS MN
55402

BUR.ENGR.IND.DIV. MR.KIBIGER
219 N. 2ND ST.
MPLS. MN

CAIN RUTH
730 E 38TH ST
MPLS MN
55407

CAIRNS JOHN A
47TH FLR IDS CENTER
MPLS MN
55402

CARRISON DALE K
MANKATO STATE COLLEGE
MANKATO MN
56001

CHAMBER OF COMMERCE
30 SO 1ST AVE EAST
ELY MN
55731

CHIEF EDITOR ST INFO UNIT
1231 25TH ST NW
WASHINGTON DC
20037

CHILDS J L
4012 LYNN AVE S
MPLS MN
55416

CHRYSALIS CENTER FOR WOMEN
2104 STEVENS AVE S
MPLS MN
55404

CITY CLERK
386 CITY HALL
ST PAUL MN
55102

CITY OF ALBERT LEA
221 E CLARK ST
ALBERT LEA MN
56007

CITY OF ALEXANDRIA
114 7TH AVE W BOX 231
ALEXANDRIA MN
56308

CITY OF ANDOVER
1685 CROSSTOWN BLVD NW
ANOKA MN
55303

CITY OF ANOKA
CITY HALL 2015 1ST AVE
ANOKA MN
55303

CITY OF BLOOMINGTON
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

CITY OF BRAINERD
CITY HALL
BRAINERD MN
56401

CITY OF BROOKLYN PARK
5800 85TH AVE NO
BROOKLYN PARK MN
55443

CITY OF BUFFALO
212 CENTRAL AVE
BUFFALO MN
55313

CITY OF CARVER COUNTY
600 E FOURTH ST
CHASKA MN
55318

CITY OF CHAMPLIN
12001 HWY 52
CHAMPLIN MN
55316

CITY OF CIRCLE PINES
9201 LEXINGTON AVE NO
CIRCLE PINES MN
55014

CITY OF CLEAR LAKE
ROUTE 1
CLEAR LAKE MN
55319

CITY OF COTTAGE GROVE
7516 80TH ST SO
COTTAGE GROVE MN
55016

CITY OF CROOKSTON
PO BOX 374
CROOKSTON MN
56716

CITY OF DETROIT LAKES
106 E HOLMES ST
DETROIT LAKES MN
56501

CITY OF DODGE CENTER
CITY HALL
DODGE CENTER MN
55927

CITY OF EAST BETHEL
2751 VIKING BLVD NE
WYOMING MN
55092

CITY OF E GRAND FORKS
P O BOX 453
E GRAND FORKS MN
46721

CITY OF FAIRMONT
114 E 1ST ST
FAIRMONT MN
56031

CITY OF FRIDLEY
6431 UNIVERSITY AVE NE
FRIDLEY MN
55432

CITY OF HASTINGS
100 SIBLEY ST
HASTINGS MN
55033

CITY OF HOPKINS
1010 1ST ST SO
HOPKINS MN
55343

CITY OF JACKSON
CITY HALL
JACKSON MN
56143

CITY OF JORDAN FRANK HOUSER2
10 E 1ST
JORDAN MN
55352

CITY OF LAKE INDEPENDENCE
RT 1 BOX 123A
MAPLE PLAIN MN
55359

CITY OF LAKEVILLE
8830 207TH ST W
LAKEVILLE MN
55044

CITY OF APPLE VALLEY
14200 CEDAR AVE SO
APPLE VALLEY MN
55124

CITY OF BLAINE
9150 CENTRAL AVE NE
BLAINE MN
55434

CITY OF BRECKENRIDGE
CITY HALL
BRECKENRIDGE MN
56520

CITY OF BROOKLYN CENTER
6301 SHINGLE CREEK PKWY
BROOKLYN CTR MN
55430

CITY OF BURNSVILLE
1313 E HWY 13
BURNSVILLE MN
55337

CITY OF CAMBRIDGE
139 E FIRST AVE
CAMBRIDGE MN
55008

CITY OF CHANHASSEN
7610 LAREDO
CHANHASSEN MN
55317

CITY OF CHASKA
205 E 4TH ST
CHASKA MN
55318

CITY OF COLUMBIA HEIGHTS
590 40TH AVE NE
COLUMBIA HGHT MN
55421

CITY OF COON RAPIDS
1313 COON RAPIDS BLVD
COON RAPIDS MN
55433

CITY OF CRYSTAL
4141 DOUGLAS DRIVE NO
CRYSTAL MN
55422

CITY OF DEEPHAVEN
20225 COTTAGEWOOD RD
DEEPHAVEN MN
55331

CITY OF DULUTH
CITY HALL
DULUTH MN
55802

CITY OF EAGAN
3795 PILOT KNOB ROAD
EAGAN MN
55122

CITY OF EDEN PRAIRIE
8950 EDEN PRAIRIE RD
EDEN PRAIRIE MN
55343

CITY OF EDINA
4801 W 50TH ST
EDINA MN
55424

CITY OF GOLDEN VALLEY
7800 GOLDEN VALLEY RD
GOLDEN VALLEY MN
55427

CITY OF HAM LAKE
15544 CENTRAL AVE NE
ANOKA MN
55303

CITY OF HUTCHINSON
37 WASHINGTON AVE WEST
HUTCHINSON MN
55350

CITY OF INVER GROVE HTGS
8659 COURT HOUSE BLVD
INVER GROVE MN
55075

CITY OF LACRESCENT
PO BOX 142
LACRESCENT MN
55947

CITY OF LAKE ELMO
11194 UPPER 33RD ST
LAKE ELMO MN
55042

CITY OF LITCHFIELD
126 NO MARSHALL
LITCHFIELD MN
55355

CITY OF LITTLE CANADA
515 LITTLE CANADA RD
LITTLE CANADA MN
55117

CITY OF LITTLE FALLS
100 7TH AVE NE
LITTLE FALLS MN
56345

CITY OF MAPLE GROVE
9401 FERNBROOK LANE
MAPLE GROVE MN

CITY OF MINNEPOLIS
3801 66TH AVE NO
BROOKLYN CTR MN
55429

CITY OF MINNETONKA
74600 MINNETONKA BLVD
MINNETONKA MN
55343

CITY OF MOUNDSVIEW
2401 HWY 10
ST PAUL MN
55113

CITY OF MOUNTAIN LAKE
CITY HALL
MOUNTAIN LK MN
56159

CITY OF NORTHFIELD
304 SO DIVISION
NORTHFIELD MN
55057

CITY OF OAKDALE
1584 HADLEY AVE SO
OAKDALE MN
55119

CITY OF PROCTOR
200 2ND ST CITY HALL
PROCTOR MN
55810

CITY OF RAMSEY
14100 ST FRANCIS DR
ANOKA MN
55303

CITY OF ROBBINSDALE
4221 LAKE RD
ROBBINSDALE MN
55422

CITY OF ROCHESTER
1421 3RD AVE SE
ROCHESTER MN
55901

CITY OF ST ANTHONY
2900 KENZIE TERRACE
MPLS MN
55418

CITY OF ST CLOUD
CITY HALL
ST CLOUD MN
56301

CITY OF ST PETER
BOX 270
ST PETER MN
56082

CITY OF SAVAGE
12305 QUENTIN AVE SO
SAVAGE MN
55378

CITY OF SOUTH ST PAUL
125 3RD AVE NO
SO ST PAUL MN
55075

CITY OF SPRING LAKE PARK
1301 81ST AVE NE
SPRING LAKEPK MN
55432

CITY OF WAYZATA
600 RICE STREET
WAYZATA MN
55391

CITY OF WHITE BEAR LAKE
250 MILLER AVE
WHITE BEAR LK MN
55110

CLARKSON J.B.
2350 I.D.S. CENTER
MINNEAPOLIS MN
55402

CLAUSEN PHILLIP
2307 STANDISH ST
ST PAUL MN
55108

COLLIN LAURENCE
RT 2
ISANTI MN
55040

COMMUNITY DESIGN CENTER
118 E 26TH ST
MPLS MN
55404

CITY OF MAPLEWOOD
1380 FROST AVE
MAPLEWOOD MN
55109

CITY OF MENDOTA HEIGHTS
BANK BLDG 750 S PLAZADR
ST PAUL MN
55120

CITY OF MOORHEAD
BOX 779 CITY HALL
MOORHEAD MN
56560

CITY OF MORRIS
CITY HALL
MORRIS MN
56244

CITY OF NEW BRIGHTON
803 5TH AVE NW
NEW BRIGHTON MN
55112

CITY OF NEW HOPE
4401 XYLON AVE NO
NEW HOPE MN
55428

CITY OF ORONO
PO BOX 66
CRYSTAL BAY MN
55323

CITY OF PLYMOUTH
3025 HARBOR LANE
PLYMOUTH MN
55441

CITY OF REDLAKE FALLS
BOX 448
RED LAKE FALL MN
56750

CITY OF RICHFIELD
6700 PORTLAND AVE
RICHFIELD MN
55423

CITY OF ROSEMOUNT
BOX 455
ROSEMOUNT MN
55068

CITY OF ROSEVILLE
2701 NO LEXINGTON AVE
ROSEVILLE MN
55113

CITY OF ST LOUIS PARK
5005 MINNETONKA BLVD
ST LOUIS PARK MN
55416

CITY OF ST PAUL
445 CITY HALL
ST PAUL MN
55102

CITY OF SHAKOPEE
129 E 1ST AVE
SHAKOPEE MN
55379

CITY OF SHOREVIEW
4665 NO VICTORIA ST
SHOREVIEW MN
55112

CITY OF THIEF RIVER FALLS
BOX 528
THIEF RIVERFA MN
56701

CITY OF WARREN
CITY HALL
WARREN MN
56762

CITY OF WINDOM
444 9TH STREET
WINDOM MN
56101

CITY OF WOODBURY
2100 RADIO DRIVE
WOODBURY MN
55041

COLEMAN NICHOLAS
208 STATE CAPITOL
ST PAUL MN
55155

COLHAPP TED
1294 VALLEY VIEW ROAD
CHASKA MN
55318

CONCORDIA COLLEGE
DEAN
MOORHEAD MN
56560

CONSUMER SERVICES DEPT CO
5TH FLR METRO SQ BLDG
ST PAUL MN
55101

COUNTY ATTYS COUNCIL
40 NO MILTON ST STE 106
ST PAUL MN
55104

COUNTY OF OLMSTED
1421 SE 3RD AVE
ROCHESTER MN

CUSHMAN J S DAYTON HUDSON
700 NICOLLET MALL
MPLS MN
55402

DANKERS,KENNETH
1200 WEST FOURTH STREET
RED WING MN
55066

DANIELSON RODNEY L
418 AUDITORIUM
ST PAUL MN
55102

DEAN MARIAN MRS
135 COLORADO ST EAST
ST PAUL MN
55107

DEVELOP DISABILITIES PROGRAM
STATE PLAN 101 CAP SQ
ST PAUL MN
55155

DISPATCH PIONEER PRESS
PRESS RM STATE CAPITOL
ST PAUL MN
55101

DORSEY MARQUART
2400 1ST NATL BANK BLDG
MPLS MN
55402

DUNN OLIVER PLUMBERS LOC 15
708 SO 10TH ST
MPLS MN
55404

DUPONT MIKE
5720 EXCELSIOR BLVD
MPLS MN
55416

E CENTRAL REG. DEV. COMM
COURTHOUSE 18 N VINE ST
MORA MN
55051

EBELING EDWARD H.
161 W. MAIN
PERHAM MN
56573

EICHTEN DANIEL
3794 HAZEL
WHITE BEAR LK MN
55110

ELDER DR JAMES B
11140 WASHBURN AVE SO
BLOOMINGTON MN
55431

EMERICK RICHARD A
1908 IDS TOWER
MPLS MN
55402

ENDERSON WILLIAM
3644 NICOLLET AVE
MINNEAPOLIS MN
55409

ERDMAN ROGER TENNANT CO
701 N LILAC DR
MPLS MN
55441

ERICKSON BURDETTE ABI CONT
BOX 942
VIRGINIA MN
55792

ETHICS COMM
RM 410 STATE OFF BLDG
ST PAUL MN
55155

EVANS CHAS.L. PRENTICE-HALL
ENGELWOOD CLIFFS
NEW JERSEY

FABISH MIKE INTL UN OP ENG
307 1ST ST W
VIRGINIA MN
55792

FAEGRE & BENSON ATTN LIBR
1300 NW BANK BLDG
MPLS MN
55402

CRAVEN NORMAN
10637 THOMAS AVE S
BLOOMINGTON MN
55431

CROW WING CO PLANNING & A
COURT HOUSE
BRAINERD MN
56401

DAHLKE LOIS M
118 S EAGLE ST
BELLE PLAINE MN
56011

DAILEY THOMAS ECONOMICS L
370 WABASHA ST
ST PAUL MN
55102

DAWSON JEAN MN GOV'T REPORT
ROOM B12 CAPITOL
ST PAUL MN
55155

DAYTON CHAS SIERRA CLUB
800 MIDLAND BANK BLDG
MPLS MN
55401

DICKINSON MRS JOANNE
BOX 1065
MARSHALL MN
56258

DIEHL JOHN
26 KENWOOD PKWY
ST PAUL MN
55105

DOUGLAS BELL ET AL
2212 AM.NATL BK BLDG
ST PAUL MN
55102

DOW CHEMICAL
47 BLDG
MIDLAND MI
48640

DZUGAN KEN ST PAUL PLANNING
421 WABASHA ST
ST PAUL MN
55102

ECKLUND WM EELLHABER-LARSON
W 1080 1ST NATL BANK
ST PAUL MN
55101

EDEVOLD RUTH
PO BOX 248
BEMIDJI MN
56601

ELDRED R W ARMOUR & CO
UNION STOCK YARDS
SO ST PAUL MN
55075

ELMER EDWIN W
2901 PLEASANT AVE
MPLS MN
55408

ENNIS A F BOISE CASCADE
PO BOX 713
INTL FALLS MN
56649

ENV SERV-GEN RESOURCE COR
6340 INDUSTRIAL DR
HOPKINS MN
55343

ERNEST K LEHMANN & ASSOC.
1409 WILLOW ST.
MPLS MN
55403

ESSE KENNETH
4801 W 50TH ST
EDINA MN
55424

EWING MRS WM
42 ASTAR RD
BABBITT MN
55706

FARMERS ELEVATOR ASSN
852 GRAIN EXCH BLDG
MPLS MN
55415

FARRELL FRANK BUR NOR
RM 1180 176 E 5TH ST
ST PAUL MN
55101

FARSETH PAUL FOOD STAMPS PRO
WELFARE DEPT 690 N ROBT
ST PAUL MN

FED-ST REPORTS INC MURPHY PP
O BOX 986 COURT H STA
ARLINGTON VA
22216

FINNEGAN J.R.
55 E. 4TH
ST.PAUL MN
55101

FITZGERALD DR BOB
3007 LYNDALE AVE SO
MPLS MN
55408

FLADLAND CLINT MN L&P BUR
795 RAYMOND AVE
ST PAUL MN
55114

FORBES GORDON MINN RRS ASSN
203 HANOVER 480 CEDAR
ST PAUL MN
55101

FOX W.E. LINDQUIST & VENNUM
4200 IDSCTR 80 S.8TH ST
MINNEAPOLIS MN
55402

FRANKLIN ROBERT B MPLS TRIB
426 PORTLAND
MPLS MN
55415

FREDRIKSON BYRON ET AL
47TH FLR IDS CENTER M
PLS MN
55402

FRIESEN MILLER A
RAHR BD 624 13TH ST S
VIRIGINIA MN
55792

GALVIN M J JR
W2162 1ST NATL BK BLDG
ST PAUL MN
55101

GARDNER HDW - R A JOHNSON
515 WASHINGTON AVE N
MPLS MN
55401

GIEL DAVID
RM B-28 STATE CAPITOL
ST PAUL MN
55155

GLEESON MICHAEL
909 SOC SC BLDG U OF M
MPLS MN
55455

GOLDBERG PROF MELVIN
WM MITCHELL COL OF LAW
ST PAUL MN
55105

GOODMAN DF TEL CABLE TV
302 E SUPERIOR
DULUTH MN
55802

GREATER MET AREA HOSPITALITY
5152 CEDAR AVE S
MPLS MN
55417

GREEN DEL CITY MGR
BLOOMINGTON CITY HALL
BLOOMINGTON MN
55431

GRUMMERT REV DONALD
1435 ADAMS ST
MPLS MN
55413

GUSTAFSON WALLACE
BOX 567
WILLMAR MN
56201

HANFT PHILIP M
1200 ALWORTH BLDG
DULUTH MN
55802

HANSON WARREN A SKELGAS
PO BOX 1650
TULSA OK
74102

HAUN DR J W GEN MILLS
PO BOX 1113
MPLS MN
55440

HAYES,THOMAS W
700 SELLWOOD BLG
DULUTH MN
55812

FELHABER R S
W 1ST NATL BANK BLDG
ST PAUL MN
55101

FILTER LOREN
BOX 36
BRITT MN
55701

FITZPATRICK LEO
8138 HENSLOWE AVE S
COTTAGE GROVE MN
55016

FLEMING FREDERICK A
1860 HIGHLAND PARKWAY
ST PAUL MN
55116

FORSBERG AGR SERV
518 SUMMIT AVE
NEW ULM MN
56073

FORSCHLER RICHARD
1500 NW FIN CENTER
MPLS MN
55431

FREDIN CONRAD M
811 FIRST NATL BK BLDG
DULUTH MN
55802

FREDLUND MRS PHYLLIS
RR 4 BOX 37
CANBY MN
56220

FRISON FRANK NECA
RM 305 200 SO ROBERT
ST PAUL MN
55107

GEBERT K L
220 GRAIN EXCH
MPLS MN
55415

GEO A HORMEL & CO LAW DE
PO BOX 800
AUSTIN MN
55912

GLEN. HILLS HOSP.R.VAN HAUER
3901 GOLDEN VALLEY RD.
MPLS. MN
55422

GODIN RALPH J
3824 47TH AVE SO
MPLS MN
55406

GRAHAM THOS H
854 MIDLAND BK BLDG
MPLS MN
55401

GRANATH MARVIN -HONEYWELL
2701 4TH AVE SO
MPLS MN
55408

GREEN GARY J
41 SHERBURNE AVE
ST PAUL MN
55102

GREEN JANET
9773 N SHORE DR
DULUTH MN
55804

H B FULLER CO
2400 KASOTA AVE
ST PAUL MN
55108

HAROLD J WESTIN CONSTRUCTORS
45 E 8TH ST
ST PAUL MN
55101

HARRY RICK
RT 1 BOX 138
KETTLE RIVER MN
55757

HART PATRICK V
112 E LIBERTY BOX 3271
MANKATO MN
56001

HARTFELDT WILL
434 HAMM BLDG
ST PAUL MN
55102

HAVEN ROBT TWIN TN TREATMENT
1706 UNIV AVE
ST PAUL MN
55104

HEAD & TRUHN
1007 SOO LINE BLDG
MPLS MN
55402

HEANEY BILL
30 W SUPERIOR ST
DULUTH MN
55802

HEARING EX.OFF. M GREENBERG
1745 UNIV AVE
ST PAUL MN
55104

HELTZER JAMES DAYTON HUDSON
777 NICOLLET MALL
MPLS MN
55402

HENDRICKSON A WM
100 FREEMAN DRIVE
ST PETER MN
56082

HOLEY GEORGE
1509 SW SIXTH STREET
FARIBAULT MN
55021

HOLMES EUSTIS ET AL
4610 IDS CENTER
MPLS MN
55402

HOLT JOHN
517 4TH ST NW
FARIBUALT MN
55021

HOULE MELVIN
881 W HWY 96
SHOREVIEW MN
55112

HUMAN RIGHTS
200 CAPITOL SQ BLDG
ST PAUL MN
55101

HUSEBYE, CRAIG J.
5036 FRANCE S.
EDINA MN
55410

IMS PAUL

ECHO MN

INGVALSON VERN MN.FARM BU
1976 WOODDALE BOX 43370
ST PAUL MN
55164

INS FED OF MINN
902 SOO LINE BLDG
MPLS MN
55402

IZAAK WALTON MN DIV
111 E FRANKLIN RM-210
MPLS MN
55404

JENOS INC.
525 LAKE AVE SO
DULUTH MN
55801

JENSEN ARTHUR,CITY CLK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

JOHANSEN BUS SERV INC
19 DAYTON RD
CHAMPLIN MN
55316

JOHNSON & SANDERSON
ST MARYS HOSPITAL
ROCHESTER MN
55901

JOHNSON GEL MACI
HANOVER BLDG
ST PAUL MN
55101

JOHNSON LEROY
9939 BLUEBIRD ST NW
COON RAPIDS MN
55433

HEADWATERS REG DEV. COMM
BOX 584 MENTAL HEALTH
BEMIDJI MN
56601

HEALTH MANPOWER C LARSON
717 DELAWARE ST SE
MPLS MN
55440

HEIM PAUL M
3944 IDS CENTER 80 S 8
MPLS MN
55402

HEISENFELT WM
BOX 516
BEMIDJI MN
56601

HENDRICKSON MRS VIRGINIA
3324 COUNTRY WOOD DR
BURNSVILLE MN
55337

HINRICHSEN PATRICK
MANKATO FREE PRESS
MANKATO MN
56001

HOPKINS WM.B. DIR.MISCCA
3915 GOLDEN VALLEY ROAD
GOLDEN VALLEY MN
55422

HORNER WALDORF - KAZIUKEW
PO BOX 3260
ST PAUL MN
55165

HOUSE APPROPRIATIONS COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HULSTRAND ANDERSON & LARS
PO BOX 130
WILLMAR MN
56201

HUTCHISON R.M. ANOKA CO.COMP
COURT HOUSE
ANOKA MN
55303

HYLAND DEAN
1501 W 50TH ST
MPLS MN
55419

INGEBRIGTSEN DR K H
23 SE 4TH ST
MPLS MN
55414

INGRAM ALAN NASW MN CH
22 NO DALE ST
ST PAUL MN

INTERSTATE POWER RW STEELE
1000 MAIN ST
DUBUQUE IA
52001

IVERSON DR JOS DEPT ED
ST OLAF COLLEGE
NORTHFIELD MN
55057

JAIN NIRMAL ENIV PROCESS
1220 GLENWOOD AVE
MPLS MN
55405

JASPER GLEN
ROUTE 1
MONTROSE MN
55363

JENSEN CARL A
127 E MAIN ST
SLEEPY EYE MN
56085

JENSEN MRS GAYNOLD
111 WEST 107TH ST
MPLS MN
55420

JOHNSON CLARENCE IBEW LU 292
3615 37TH AVE S
MPLS MN
55406

JOHNSON G ROBERT
4344 IDS CENTER
MPLS MN
55402

JOHNSON M.D. FRUNDT & FRUNDT

BLUE EARTH MN
56013

JOHNSON LANCE J
265 S LAFAYETTE RD
ST PAUL MN
55107

JONES C NORTHSIDE RES REDEV
1800 OLSON MEMORIAL HWY
MPLS MN
55411

KEABLE MIKE
909 6TH AVE N
ST CLOUD MN
56301

KEENAN RICHARD J
4444 IDS BLDG
MPLS MN
55402

KLUZ STEVEN J
1910 1ST NATL BK BLDG
MPLS MN
55402

KNOPP TIMOTHY
COLLEGE FORESTRY U OF M
ST PAUL MN
55108

KOPP MRS VERNON
2050 65TH ST E
INVER GR HGHT MN
55075

KRAMER ERNEST W
717 DELAWARE ST SE
MPLS MN
55440

KRONLOKKEN J E
10048 NORD RD
BLOOMINGTON MN
55437

KVB ENGINEERING INC
600 S CO RD 18
MPLS MN
55426

LAKE SUPERIOR INDUSTRIAL BUR
828 FIRST AM. BK. BLDG.
DULUTH MN
55802

LANGVIN DAVID
7500 80TH ST S
COTTAGE GROVE MN
55016

LARSON HANS P DIV HOSP SERV
717 DELAWARE ST SE
MPLS MN
55440

LEAGUE MN MUNIC
300 HANOVER 480 CEDAR
ST PAUL MN
55101

LEG REPORT SERV-P STURDEVANT
PO BOX 3259
ANNAPOLIS MD
2140

LEVEY JESS MET STATE UNIV
METRO SQ RM 121
ST PAUL MN
55101

LIBBEY LEONARD
BOX 17011 NOKOMIS STA
MPLS MN
55417

LINDALL & JONATHAN DEVELOP.
VILLAGE ONE CENTER
CHASKA MN
55318

LOWE DOUG
2701 N LEXINGTON AVE
ROSEVILLE MN
55113

LUTH SOC SERVICE OF MN
2414 PARK AVE
MPLS MN
55404

MACLIN ALAN ASST ATTY GEN
720 AMERICAN CENTE BLDG
ST PAUL MN
55101

MALONE E I COMM LABOR & INDU
444 LAFAYETTE RD 5TH FL
ST PAUL MN
55101

MANKATO STAT STUDENT SENATE
CENTENNIAL STUDENT UN
MANKATO MN
56001

KABLE RICHARD W

BETHEL MN
55006

KAVANEY RICHARD
1220 NORTHERN FED BLDG
ST PAUL MN
55102

KJERVIK DIANE
4302 POWEL HALL U OF M
MPLS MN

KLOSTER MARION PEAVEY CO
730 2ND AVE S
MPLS MN
55402

KNUTSON DR KEITH,BIOLOGY DPT
ST CLOUD STATE
ST CLOUD MN
56301

KNUTSON R N GRANNIS ETAL
F J SCHULT BLDG
ST ST PAUL MN
55075

KROEGER CHARLES
122 NW 7TH STREET
FARIBAULT MN
55021

KROON H CLIFTON
210 E WALNUT
MANKATO MN
56001

LABELLE JUANITA MRS
5816 AQUILA AVE NO
NEW HOPE MN
55428

LAPP LAZAR LAURIE ET AL
1200 BUILDERS EXCHANGE
MINNEAPOLIS MN
55402

LARSON C L
3800 MINNEHAHA AVE SO
MPLS MN
55406

LEAGUE WOMEN VOTERS OF MINN
555 WABASHA
ST PAUL MN
55102

LEG.REF.LIB-Z. DEWITT
RM 111 STATE CAPITOL
ST PAUL MN
55155

LEAVEY THOS
829 22ND AVE SE
MPLS MN
55414

LEWIS DR.G.M JR.
ABBOTT 110 E 18TH ST
MPLS MN
55403

LOCH DAVID REG 5 REG DEV C06
11 IOWA AVE
STAPLES MN
56479

LOCKNER GARY
R R 1 BOX 23
BAUDETTE MN
56623

LYNCH DONALD SIBLEY CO
184 E 6TH ST
ST PAUL MN
55102

MAHCF RICK CARTER
2850 METRO DR SUITE 431
BLOOMINGTON MN
55420

MALECKI JAMES
1 SO STATE ST
NEW ULM MN
56073

MANKATO STATE STUDENT ASSN
BOX 58 MANKATO COLLEGE
MANKATO MN
56001

MANTHEY T J PICKANDS MATH
1100 SUPERIOR AVE
CLEVELAND OH
44114

MARKKULA BRUCE
6533 THOMAS AVE SO
RICHFIELD MN
55423

MASTOR & MATTSON LTD
315 PEAVEY BLDG
MPLS MN
55402

MCCLURG EUNICE
1061 109TH AVE NE
BLAINE MN
55434

KOLLER MR & MRS ERWIN A
1568 DULUTH ST
ST PAUL MN
55108

MCKIBBON MRS SHIRLEY
11 EVERGREEN LN
BABBITT MN
55706

MCNEILLY GREG MNDSVIEW ED AS
41 SHERBURNE AVE
ST PAUL MN
55103

MET TFR MEN ASSN A ROSENTHAL
1821 UNIV AVE
ST PAUL MN
55104

METROPOLITAN COUNCIL LIBRARY
300 METRO SQUARE
ST PAUL MN
55155

MILLER M ADMIN AGENCIES DIV
G19K STATE ADM BLDG
ST PAUL MN
55155

MILLER PAUL J PHARMACY SERV
ST MARYS HOSP
ROCHESTER MN
55901

MINN ASPHALT PAVEMENT ASSN
555 WABASHA RM 209
ST PAUL MN
55102

MINN ASSN COOPERATIVES
55 SHERBURNE AVE
ST PAUL MN
55103

MINN ASSN VOL SOC SERVICE
1821 UNIV SUITE 389
ST PAUL MN
55114

MINN ASSN WATERSHED DIST'S

ADA MN
56510

MINN COMMUNITY DEVELOP SERV
512 ROSSMOR BLDG
ST PAUL MN
55101

MINN DEPT HEALTH J C MCKASY
717 DELAWARE S E
MPLS MN
55440

MINN GOV ENG COUNCIL
2400 SHERWOOD HILL RD
MINNETONKA MN
55343

MINN HEREFORD-LJ SCHAFER

BUFFALO LAKE MN
55314

MINN HWYS MANAGEMENT SERVICE
407 HWY BLDG
ST PAUL MN
55101

MINN LAND USE COMMITTEE
4344 IDS CENTER
MPLS MN
55402

MINN MULTIHOUSING ASSN
3100 W LAKE ST
MPLS MN
55416

MINN PETROLEUM COUNCIL
1020 NORTHERN FED BLDG
ST PAUL MN
55102

MINN RESTAURANT ASSN
2001 UNIVERSITY AVE.
ST PAUL MN
55104

MINN RETAIL FEDERATION
180 METRO SQUARE BLDG
ST PAUL MN
55101

MAUL WARREN E
320 S 4TH ST
MPLS MN
55415

MAYO FOUNDATION G ORWOLL
200 FIRST AVE NW
ROCHESTER MN
55901

MCDONALD PHILIP M
2077 SELBY AVE
ST PAUL MN
55104

MCFADDEN G H DISPATCH-PR
55 E 4TH ST
ST PAUL MN
55101

MEIEROTTO, JOAN
1794 SO LEXINGTON
ST PAUL MN
55118

MET. WASTE CONTOL COMM.
350 METRO SQ BLG
ST PAUL MN
55101

MEYER HERBERT
10824 ZENITH AVE S
BLOOMINGTON MN
55431

MIDLAND GLASS-HD SPURLING
PO BOX 69
SHAKOPEE MN
55379

MILLER RICHARD A
1020 PLYMOUTH BLDG
MPLS MN
55402

MILLER TOM
2311 PILLSBURY AVE S
MPLS MN
55404

MINN ASSN ELEC COOPERATIVES
4901 W 77TH ST
MPLS MN
55435

MINN. ASSN. PET. RETAILERS
1115 2ND AVE. SO.
MINNEAPOLIS MN
55403

MINN CHAP ASSOC BLDRS-CONTRS
7204 W 27TH ST
MPLS MN
55426

MINN COMM FOR HANDICAPPED
METRO SQ 492 7TH & ROBT
ST PAUL MN
55101

MINNESOTA FARMERS UNION
1717 UNIVERSITY AVE
ST PAUL MN
55104

MINN FOOD RETAILERS ASSN
555 WABASHA
ST PAUL MN
55101

MINN HOSPITAL ASSN
2333 UNIV AVE SE
MPLS MN
55414

MINN. HOTEL & MTR. ASSN
2001 UNIVERSITY AVE
ST PAUL MN

MINN LP GAS ASSN
7515 WAYZATA BLVD 106
MPLS MN
55426

MINN.MTR.TRANSP. .J.N.D
1821 UNIV.
ST.PAUL MN
55104

MINN POLLUTION CONTROL AGCY
1935 W CO RD B2
ROSEVILLE MN
55113

MINN POULTRY & HATCHERY A
BOX 158
MADELIA MN
56062

MINN RETAIL HARDWARE ASSN
3033 EXCELSIOR BLVD 313
MPLS MN
55416

MINN STATE BAR ASSN
100 MINN FED BLDG
MPLS MN
55402

MINN STATE BD PHARMACY
717 DELAWARE ST SE #351
MPLS MN
55414

MINN STATE EMP UNION COUNC 6
236 E PLATO BLVD
ST PAUL MN
55107

MINN TEAMSTERS CREDIT UNION
2021 HENN AVE E
MPLS MN
55413

MINN TBR PRODUCERS ASSN
200 CHRISTIE BLDG
DULUTH MN
55802

MINN WATER RESOURCES BD
RM 206 555 WABASHA ST
ST PAUL MN
55102

MINN-WISC BOUNDARY AREA COMM
600 2ND ST
HUDSON WI
54016

MN AUTOMOBILE DEALERS ASSN
277 UNIV AVE
ST PAUL MN
55103

MN. ASN.C&IND H.O.PETERSON
480 CEDAR ST.
ST.PAUL MN
55101

MN ELECTRICAL ASSN
3100 HUMBOLT SO
MPLS MN
55408

MN GRAPHIC DESIGNERS ASSO
PO BOX 24272
MPLS MN
55424

MN SOC SERV ASS J HOOD
614 PORTLAND
ST PAUL MN
55102

MN ST PHARMACEUTICAL ASSN
2469 UNIVERSITY AVE
ST PAUL MN
55114

MOFFITT R C
RM 301 M MPLS CITYHALL
MPLS MN
55415

MOOD R BLOOMINGTON HLTH DEPT
10200 PENN SO
BLOOMINGTON MN
55431

MOSTCA
PO BOX J
PERHAM MN
56573

MOTOR VEHICLE MFRS ASSN
411 MAIN ST (215)
ST PAUL MN
55102

MPLS STAR PRESS ROOM
STATE CAPITOL
ST PAUL MN
55101

MPLS TRIBUNE CITY DESK
425 PORTLAND AVE
MPLS MN
55415

MURPHY PATRICK DUFFY
1440 SUMMITT AVE
ST PAUL MN
55105

MURPHY PATRICK FSR INC
BOX 986 COURTHOUSE STA
ARLINGTON VA
22216

NATL CAR RENTAL ATT D MITZEL
5501 GREEN VALLEY DR
MPLS MN
55437

NATL COUNCIL JEWISH WOMEN
4330 CEDAR LK RD
MPLS MN
55416

NELSON HOWARD I

LINDSROM MN
55045

NEREN MADONNA
376 NEAL AVE S
AFTON MN
55001

MINN STATE MEDICAL ASSOC
STE 900 AM NATL BK BLDG
STPAUL MN
55101

MINN STATE RETIREMENT SYS
529 JACKSON ST
ST PAUL MN
55101

MINN.TURKEY GROWERS ASSN
2383 UNIV AVE
ST PAUL MN
55114

MINN VETERANS MED ASSN
2175 W HWY 36
ROSEVILLE MN
55113

MINNESOTA EXPRESS INC
BOX 427
WILMAR MN
56201

MIXA FRANK LK MNTKA CONS
402 E LAKE ST
WAYZATA MN
55391

MINNESOTA AFL-CIO
175 AURORA AVE
ST PAUL MN
55103

MN.BD OF NURSING
717 DELAWARE ST SE
MPLS MN
55414

MN PUB INT RESEARCH GROUP
3036 UNIV AVE SE
MPLS MN
55414

MN REP STATE CENTRAL COMM
555 WABASHA AVE
ST PAUL MN
55102

MN STATE SER BLIND-K NATARDY
1745 UNIVERSITY AVE
ST PAUL MN
55104

MN WOMEN POLITICAL CAUCAS
1821 UNIV AVE S291
ST PAUL MN
55104

MORTON BUILDINGS INC
R #1
FOLEY MN
56329

MOSS DR JEROME
125 PEIK 159 PILLSBURY
MPLS MN
55455

MPIRG
BOX 45 ST MARYS COLLEGE
WINONA MN
55987

MPLS ASSN RETARDED CITIZE
3100 W LAKE ST
MPLS MN
55416

MT OLIVET ROLLING ACRES
R 1 BOX 576
EXCELSIOR MN
55331

MURPHY DIANA E
4200 IDS-LINDQUIST VENN
MPLS MN
55402

NASS GEO V HENN CO GEN HO
5TH AND PORTLAND AVE
MPLS MN
55415

NATL FAMILY INS CO
2147 UNIV AVE
ST PAUL MN
55114

NCEC INC C/O DR DAHLBERG
CONCORDIA COLLEGE
MOORHEAD MN
56560

NEUMAN RALPH W
RT 2 BOX 125
EMBARRASS MN
55732

NO SUB MONTESSORI-S SADDL
2487 HELEN COURT
NO ST PAUL MN
55109

NORTH CENTRAL ELEC ASSN
PO BOX 202
BATTLE LAKE MN
56515

NURSING HOME ADMRS BD EXAMRS
RM 340 717 DELAWARE SE
MPLS MN
55414

NW COUNTRY ELEVATOR ASSN
802 GRAIN EXCH BLDG
MPLS MN
55415

NW REG. DEV. COMM
425 WOODLAND AVE
CROOKSTON MN
56716

O'BRIEN J.DENNIS
1100 1ST NATL.BANK BLDG
MINNEAPOLIS MN
55402

O'CONNELL RAY
MN GAS CO 733 MARQ AVE
MPLS MN
55402

OTTER TAIL POWER CO.
215 S. CASCADE ST.
FERGUS FALLS MN
56537

PAYNE COL ALVIN

DEGRAFF MN
56233

PAYNE WM B
2400 FIRST NATL BK BLDG
MPLS MN
55402

PETTRY SHELBY NATL HOMES
PO BOX 7680
LAFAYETTE IN
47903

PFEIFER AND SHULTZ, INC
1433 UTICA AVE S
MPLS MN
55416

PINNETTI NICK M HALEY & ASS.
40 CENTRAL PARK S
NEW YORK NY
10019

POPOVICH PETER S
314 MINN BLDG
ST PAUL MN
55101

PORT AUTH CITY OF ST PAUL
330 MINNESOTA BLDG
ST PAUL MN
55101

POSS DONALD G
6301 SHINGLE CREEK PKWY
BROOKLYN CTR MN
55430

PRICE WALT C REISS COAL CO
1011 SO 8TH ST
SHEBOYGAN WI
53081

PROCTOR&GAMBLE L THEOHAROUS
IVORYDALE TECH CENTER
CINCINNATI OH
45217

RADMAN RICHARD-LABOR TEMPLE
418 AUDITORIUM
ST PAUL MN
55102

RAUENHORSTCORP-RONALD G KIRK
7900 XERXES S S-2200
MPLS MN
55431

REAGAN MICHAEL
% MINN LEARNING CTR
BRAINERD MN
56401

RED OWL STORES INC
215 E EXCELSIOR AVE
HOPKINS MN
55343

REGION NINE DEV. COMM.
709 N FRONT ST
MANKATO MN
56001

NURSING HOME RES ADV CO.
111 E FRANKLIN S210
MPLS MN
55404

NW BELL TEL CO LEGAL DEPT
224 S 5TH ST RM 2000
MPLS MN
55402

NYQUIST DEAN A
3707 53RD PL N
BROOKLYN CTR MN
55429

OFFICE OF THE GOVERNOR
130 STATE CAPITOL
ST PAUL MN
55101

OLOFSON ARTHUR MBO & MAI
927 SOO LINE BLDG
MPLS MN
55402

PARKER SANDY
7480 CHANHASSEN ROAD
EXCELSIOR MN
55331

PATTISON ORVIS
BOX 645
WILLMAR MN
56201

PETERSEN DOUG ESIDE NEIGHBOR
HOOD SERV 1929 2ND STNE
MPLS MN
55418

PETERSON MYRON D
ROUTE 2 BOX 99
SACRED HEART MN
56285

PHAR MFGRS ASSN WM D PATTON
1155 15TH ST NW
WASHINGTON DC DC
20005

PHILLIPS LEGISLATIVE SERV
459 RICE ST
ST PAUL MN
55103

PORTER DAVID
3002 27 AVE S
MPLS MN
55406

PORTER LYLE O

TRACY MN
56175

POYZER ROBT
BOX 675
FERGUS FALLS MN
56357

PRAUSE JOS.C.
2220 105TH AVE.N.W.
COON RAPIDS MN
55433

PULSCHER RBT SPRINGSTED INC
813 OSBORN BLDG
ST PAUL MN
55102

RALPH BURKE ASSOCIATES
5200 W 73RD ST
MPLS MN
55435

RAMSEY CO MEDICAL SOC
908 AM NATL BK BLDG
ST PAUL MN
55101

REARDON MRS HELEN
1125 S E 6TH ST
WILLMAR MN
56201

REID DAVID H
6469 N GRAHAM RD
INDIANAPOLIS IN
46220

REINO O LAINE 3M COMPANY
3M CENTER
ST PAUL MN
55101

RENNER R.H. ST PAUL AREA
300 OSBORN BLDG.
ST PAUL MN
55102

RENQUIST ARTHUR NSP CO
414 NICOLLET MALL
MPLS MN
55401

RICHARDSON THOS
7851 METRO PKWY S 103
MPLS MN
55420

ROE DAVID
175 AURORA
ST PAUL MN
55103

ROBBIE JOSEPH
904 CARGILL BLDG NO CTR
MPLS MN
55402

ROSS ROY J
CLK TREAS
LITCHFIELD MN
55355

SAX DOVE & STENSON
310 ENDICOTT BLDG
ST PAUL MN
55101

SE MN REG DEV COMM
301 MARQ BK BLDG
ROCHESTER MN
55901

ST PAUL FOOD RETAILERS ASSN
1220 ARCADE
ST PAUL MN
55106

SCARBOROUGH WILLIAM
DIV.ED. U.M.
MORRIS MN
56267

SCHMIDT H W TCHRS RETIREMENT
302 CAPITOL SQ BLDG
ST PAUL MN
55101

SCHMIDT LARRY WCCO-TV NEWS
50 S 9TH ST
MPLS MN
55402

SCHUTZ LINDA
RM 328 CAPITOL BLDG
ST PAUL MN
55155

SCHWARTAU NEAL METH HOSP
201 W CENTER ST
ROCHESTER MN
55901

SCHNEIDER & NEESER
706 1ST ST SO PO BX 876
WILLMAR MN
56201

SCHROEDER ALFRED H
2172 CARROLL AVE
ST PAUL MN
55104

SENATE COUNSEL OFFICE
ROOM 480 STATE OFF BLDG
ST PAUL MN
55055

SENATE FINANCE COMMITTEE
ROOM 121 STATE CAPITOL
ST PAUL MN
55155

SHAW ROBERT M
616 MOBIL OIL BLDG
MPLS MN
55402

SIAS JACK W
BOX 4366-1573 SELBY AVE
ST PAUL MN
55104

SIX EAST REG. DEV. COMM.
311 W 6TH ST
WILLMAR MN
56201

SMERIKA WM.
BOISE CASCADE PAPERS
INTL FALLS MN
56649

SNELL LYN
BOX 314
EDEN VALLEY MN
55329

SNYDER, R.W. U OF M
RM 248C CLASS OFF BLDG.
ST PAUL MN
55108

RICHARDS MONTGOMERY ET AL
1430 RAND TOWER
MPLS MN
55402

RIEKE DAVID
PO BOX 9311
MPLS MN
55440

ROBERTS DR ALAN
BOX 297 MAYO U OF M
MPLS MN
55455

ROSS ALFRED
6356 WARE RD
LINO LAKES MN
55014

SANFORD S M
7000 PORTLAND AVE
RICHFIELD MN
55423

SPRAGUE CHARLOTTE B
AREA HOSPITAL BOX 339
WINDOM MN
56101

ST PAUL BUR HLTH DR P COX
555 CEDAR ST
ST PAUL MN
55101

SCHANE ETHEL
1821 UNIVERSITYAVERM389
ST PAUL MN
55104

SCHLICHT REV ROBT
611 W MAIN ST
BELLE PLAINE MN
56011

SCHMIDT WARREN WELLCOME MH5
GARDEN CITY
MN
56034

SCHNEIDER MAHLON
GREEN GIANT
LESUEUR MN
56058

SCHWERMAN EARL JR
1535 8TH AVE SE
ROCHESTER MN
55901

SCHWINN ROBT.P.
1400 SOO LINE BLDG.
MPLS. MN
55402

SCOTT CTY BLDG OFFICIAL
428 SO HOLMES ST
SHAKOPEE MN
55379

SELECTVISION INC FR VALEN
1 DAG HAMMARSKJOLD PL
NEW YORK NY
10017

SENATE GOV OP COMM
RM 303 STATE CAPITOL
ST PAUL MN
55155

SHABATURA EUGENE H
2833 LAKE AVE SO
DULUTH MN
55811

SILVERMAN JUDITH
8545 W 28TH ST
ST LOUIS PARK MN
55426

SITE ENGINEER INC
12 OLD DEERFIELD RD
WELCH MN
55089

SMITH BOB III
PIONEER BLDG
ST PAUL MN
55101

SMITH MICHAEL
75 DE KALB AVE
BROOKLYN NY
11201

SODERBERG HAROLD J
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

SODERMAN ANTHONY
1414 FOSHAY TOWER
MPLS MN
55402

SOUTHERN MINN LEGAL SERVICES
400 EXCHANGE BLDG
WINONA MN
55987

SOUTHWEST REGIONAL DEV COMM
25TH & BROADWAY
SLAYTON MN
56172

STATE & FEDERAL AGENCIES
1101-15TH NW
WASHINGTON DC
20005

STATE BD VETERINARY EXAMINER
C/O DR A C SPANNAUS DVM
WACONIA MN

STEELWORKERS CREDIT UNION
BOX 250
BABBITT MN
55706

STOLPESTAD BROWN & SMITH
1550 NW BK BLDG
ST PAUL MN
55101

SULLIVAN J KIRK
PO BOX 200
BOISE ID
83701

SULLIVAN JEANETTE
CDIC SW STATE UNIV
MARSHALL MN
56258

SWANSON DALE
1068 SO LAKE ST
FOREST LAKE MN
55025

SWANSON MORTIMER C
5824 FRANCE AVE S
EDINA MN
55410

TATE VERN 3M CO
3M CENTER 220/6W
ST PAUL MN
55101

TENNESSEN SEN ROBERT J
RM 309 STATE CAPITOL
ST PAUL MN
55165

TOWNSHIP OF WHITE BEAR
1281 HAMMOND RD
WHITE BEAR LK MN
55110

TWIN CITIES PIPING IND ASSN
2829 UNIV SE SUITE 304
MPLS MN
55414

UTLEY JOHN
4610 IDS CENTER
MPLS MN
55402

VERRILL JOHN E
DEPT SECONDARY ED UOF M
DULUTH MN
55812

VIITALA, W.C. HONEYWELL
HONEYWELL PLAZA
MPLS MN
55408

VOS LEROY
2137 BURNS AVE
ST PAUL MN
55119

WAMPLER LINUS DIR USW OF AM
609 PROVIDENCE BLDG
DULUTH MN

WANQUIST ALLEN
RM 252 FEDERAL BLDG
ST PAUL MN
55101

WELK G V NORTHERN STATES
414 NICOLLET MALL
MPLS MN
55401

WEST CENTRAL REG. DEV.
ADM BLDG,COMMUNITY COLL
FERGUS FALLS MN
56537

STAM RON
3252 DUPONT AVE SO
MPLS MN
55408

STANSFIELD ARLENE LAND O
PO BOX 116
MPLS MN
55440

STATE OF MN BLDG CODE DIV
408 METRO SQ BLDG
ST PAUL MN
55101

STD AM LIFE & ANNUITY CO
3801 W 50TH ST
MPLS MN
55410

STONE JOHN F MOSS FLAHERTY
2350 IDS CENTER
MPLS MN
55402

STUPKA & MOREM
MIDTOWN BLDG
AUSTIN MN
55912

SUMMIT NATL BANK D L MORRILL
205 AURORA AVE
ST PAUL MN
55103

SUSSEL CO.ATTN:TED SCHWEN
1850 COMO AVE.
ST PAUL MN
55108

THORNTON PETER J PLBG UN 589
107 SO 15TH AVE W
VIRGINIA MN

TIMESAVERS INC ATT R S VO
5270 HANSON COURT
MPLS MN
55422

UNION STOCK YARDS
ATTN PRES
SO ST PAUL MN
55075

VANDERVOORT T J MET WASTE
350 METRO SQUARE BLDG
ST PAUL MN
55101

VAN EVERA MUNDT ET AL
700 TORREY BLDG
DULUTH MN
55802

VILLAGE OF WOODBURY
2100 RADIO DRIVE
WOODBURY MN
55042

VOSS REV GORDON O
11120 NE 7TH ST
BLAINE MN
55434

WALTERS THOMAS MN MFG HOUSE
4530 W 77TH ST STE 227
MPLS MN
55435

WALZ SAM CO ADMINISTRATIO
ANOKA CTY COURTHOUSE
ANOKA MN
55303

WASHINGTON COUNTY
14900 61ST ST NO
STILLWATER MN
55082

WATERS, DONNA M.
110506 WINDMILL COURT
CHASKA MN
55318

WHITLOCK A G
ECON LAB OSBORN BLDG
ST PAUL MN
55102

WHITLOCK MARSHALL
RM 433 STATE OFFICE BLD
ST PAUL MN
55155

WHITING RALPH
7316 BAILEY ROAD
NEWPORT MN
55055

WICK LOUIS
8212 CLINTON AVE
BLOOMINGTON MN
55420

WILEY ENTERPRISES
101 5TH AVE SE
OSSEO MN
55369

WILLETTE MARY
2711 W 47TH STREET
MPLS MN
55410

WOLKERSTORTER THEODORE
676 17TH AVE NW
NEW BRIGHTON MN
55112

WOZNIAK D D
401 FIRST FED BLDG
ST PAUL MN
55101

ZIMMERMAN & OFFERMAN
CAMBRIDGE STATE HOSP
CAMBRIDGE MN
55008

FFFFFFFFFFFF IIIIIII II NN NN RRRRRRRRRR 9
FFFFFFFFFFFF IIIIIII II NNN NN RRRRRRRRRRR 99
FF II NN NN NN RR RR 99
FF II NN NN NN RR RR 99
FFFFFFFF II NN NN NN RRRRRRRRRR 99
FFFFFFFF II NN NN NN RRRRRRRRRR 99
FF II NN NN NN RR RR
FF II NN NNN RR RR 99
FF IIIIIII II NN NN RR RR 99
FF IIIIIII II NN N RR RR 9

WILCOX J PATRICK
1220 NORTHERN FED BLDG
ST PAUL MN
55102

WILSON R GARY PPG INDUSTR
1 GATEWAY CENTER
PITTSBURGH PA
15222

WRIGHT CO COMMUNITY SERVICES
7NW 1ST ST
BUFFALO MN
55313

WM.MITCHEL COLLEGE LAW LI
2100 SUMMIT AVE.
ST.PAUL MN
55105

WIS FEEDER PIG MARKET CO-

FRANCIS CREEK WI

WYANT CLINTON W ATTY

ATKIN MN
56431

ZACHARY LOUIS L
9809 BEARD AVE
BLOOMINGTON MN
55431

