

Columbia Heights 2040 Comprehensive Plan Comments

Mayor Donna Schmitt Columbia Heights City Council Joe Hogeboom, Community Development Department October 28, 2018

The Center for Economic Inclusion (the Center) appreciates the opportunity to comment on the draft Columbia Heights 2040 Comprehensive Plan. As an organization dedicated exclusively to advancing inclusive growth to achieve regional prosperity, the Center has urged all cities in the metropolitan area to advance a racially equitable economy through their comprehensive plans. To maximize impact, the Center is submitting specific comments on the draft plans of the five metro area cities with the highest shares of people of color.

The Center advocates that all municipalities incorporate the following elements into their comprehensive plans:

- 1. **A goal** to develop a racially equitable economy;
- 2. **Data analysis**, consistently disaggregated by race, to identify racial disparities in access to affordable housing, transit, living wage jobs and economic development;
- 3. **Policies and strategies** specifically designed to close the identified racial disparities;
- 4. A commitment to **evaluating** the impact of these policies and strategies on people of color, and to adapting those policies and strategies based on that evaluation.

While we offer recommendations on four focus areas of aligned interest, we believe that we build inclusive economies by working at the intersection of human capital, economic development, transit and access, through the lens' of race, place and income, not by addressing them as independent focus areas. And, a plan is only as successful as the sustained, intentional investment of human, intellectual, social, and financial capital that is invested in letter and spirit. To that end, the Center stands ready to partner with policy makers to incorporate these elements into draft comprehensive plans and, more generally, into the way public agencies do business.

SUMMARY COMMENTS

Goal

On Pages 1-4, the plan includes a statement on "social equity." This statement differentiates between equality and equity, acknowledges that race, ethnicity and age are predictors of life outcomes, and commits the plan to advance equitable outcomes for all. It also states that the City and Comprehensive Plan Advisory Committee reviewed the plan's goals and policies to advance equitable opportunities for all.

The Center supports this equity statement and encourages the City to strengthen it by:

- Making it an explicit goal that drives the plan.
- Changing the name to "racial equity." By lumping together race, ethnicity and age, the focus is fragmented and therefore the goal less effective. (The City could make an additional statement or goal about barriers to opportunity based on age.)
- Describe how the City and Comprehensive Plan Advisory Committee reviewed the plan's goals and policies for equity; the process pursued, criteria and tools used, and the specific findings of the goals and policies that were assessed.

The Center also recommends that City weave the equity goal throughout the plan. While "ethnic diversity" is mentioned in several chapters, there is no discussion of racial equity in the remainder of the plan.

Data

One way the City could weave the racial equity goal into the plan is through data analysis. Although the plan provides data on the City's increasing racial diversity, it does not clearly identify how that diversity intersects with other issues such as education, housing, transit, or economic development. The plan does not disaggregate data by race in any of the chapters.

The Center recommends that the City disaggregate key data sets by race, such as housing cost burden, unemployment, homeownership, and educational attainment. By assessing the racial disparities, inequities and the economic opportunities that Columbia Heights residents stand to gain by addressing these inequities, the City is better positioned to develop a plan with racial equity centrally and appropriately focused. Further, a data informed plan that specifically identifies disparities in housing, economic development, transportation and other areas builds a foundation goal setting and policy making to address them.

Policies

The plan does not name any policies that are designed to advance racial equity. If racial equity was a driver behind any of the plan's policies, the Center encourages the City to state that explicitly. By doing so, it sets up the policy for more effective implementation and evaluation.

¹ Each chapter presents a different plan element (e.g., land use, housing, transportation and parks), in addition to a series of supporting goals and policies for that elelment. (sic) The goals and policies were reviewed by the City and the Comprehensive Plan Advisory Committee to help advance equitable opportunities for all. In many communities, including Columbia Heights, there are barriers that prevent all residents from having the same opportunities to thrive. For instance, race, ethnicity, and age continue to be predictors of health, education, income, housing, and recreation. It is important to note that a focus on equity does not mean providing equal access to the same amount of resources. Equity is focused on making sure everyone has the resources they need to lead a healthy, productive life. The Columbia Heights' Comprehensive Plan is committed in advancing equitable opportunities for all.

The Center also encourages the City to consider including additional policies to advance racial equity; specific examples follow in the section below.

Evaluation

The draft plan does not commit to evaluating the outcomes of policies and programs by race. The Center encourages the City to include a commitment to ongoing policy evaluation by race as part of the implementation chapter of the plan.

ADDITIONAL COMMENTS

The following sections provide examples that illustrate the summary comments above.

Data

Chapter 2, Community Context, presents data about Columbia Heights that inform the rest of the plan. On page 2-9, the plan provides data on the growing racial diversity in Columbia Heights and makes a statement about its significance.² The Center supports the inclusion of this data point and encourages the City to go further in its analysis. How does the City's growing diversity impact housing needs and service delivery? What are the perceived opportunities and challenges? What steps is the City taking in response?

To dive deeper into these questions, the Center urges the City to disaggregate additional datasets by race. By doing so, the City can identify racial disparities and then plan policies and programs to address them. The plan does not disaggregate data by race in any chapter. The Center suggests some starting places to disaggregate data by race in the Community Context chapter are: age, education, income and poverty.

The Center encourages the City to disaggregate data sets in other chapters by race as well, such as unemployment and homeownership status. Pages 3-36 include a discussion about increased racial diversity in Columbia Heights and its implications for housing and the workforce.³ While this discussion is a step in the right direction, it would be stronger if it_was rooted in data. For example, consider the average family sizes of immigrants their specific housing needs; the skills immigrant populations in Columbia Heights possess and what are the needs? Where are the gaps?

² "By 2015, 64% of Columbia Heightts' (sic) population identified as "white only," only slightly more than Minneapolis (60%). This trend is likely to be one of the defining elements of Columbia Heights over the next decade. Columbia Heights' ethnic diversity will shape the City's housing demands and the delivery of services, such as, recreation opportunities, multiple language materials and communications, school programming, and retail services."

^{3"} In recent years, Columbia Heights has seen an increasingly diverse population, both in terms of the racial make-up of the city and the number of recent immigrants to the United States. This trend is also common of many first ring suburbs and poses unique challenges and opportunities both for the City and the larger region. Immigrant populations have different social service needs than the traditional suburban population, such as the need for English classes or signage and other public service announcements in a variety of languages, and also have different housing needs. Because many immigrant families live with members of the extended families, these families typically need larger housing or apartments. As the baby-boomers retire from the workforce, immigrant populations will provide valuable skills and fill vacant positions. However, increased emphasis on training and education will be required to ensure that this population has the skills necessary to do so."

The Center also suggests that a geographic analysis of poverty and People of Color in Columbia Heights would inform the plan. By identifying where these populations are concentrated, the City can more effectively plan its investments in infrastructure and services to advance racial equity. One way to do this analysis is by using the Metropolitan Council's mapping and analysis of Areas of Concentrated Poverty (ACPs).⁴ (The population in the Columbia Heights' ACP is just under 50% People of Color, which is the threshold for the designation of ACP50 (Area of Concentrated Poverty with 50% or more People of Color)). The Center suggests that, at a minimum, the City includes the ACP map of Columbia Heights in the Community Context.

Economic Development

Page 5-99 of the Economic Development chapter alludes to workforce challenges and their consequence in the local and regional economy.⁵ Given the significance of this issue, the Center recommends that the City includes a section on Human Capital in its Economic Development chapter. This section would answer questions such as: What human capital resources does Columbia Heights currently have? What are the levels of education attainment and skills, and how do these factors disaggregate by race? What are the current and future workforce needs? What are the opportunities to strengthen residents' skills and education? What are current and potential workforce development programs, partners and opportunities?

The Center also recommends that the City commits to explore the framework of Community Wealth Building in its economic development strategy. Community Wealth Building is a place-based, systems approach to community economic development to address historical barriers to equitable economic inclusivity. It is a broad, encompassing framework that includes specific strategies such as business conversions to worker-owned cooperatives. Local nonprofit entities such as Nexus Community Partners can provide more insight on the framework, which nearby jurisdictions such as Brooklyn Park are currently considering.

Pages 5-82 include the following action: "Continue business relationships with the community that encourage job growth through entrepreneurships, sole proprietorships, and micro businesses." The Center encourages the City to expand on this with a focus on minority-owned small businesses. One specific way to do this would be for the City to set and track procurement goals around the utilization of minority-owned businesses.

Housing and Transit

On pages 4-63 the plan includes a goal about the incorporation of affordable housing at 60% AMI in future redevelopments. The Center encourages the City to consider an additional goal to accommodate households that are severely (<30% AMI) or moderately cost-burdened (31-50% AMI).

Pages 4-66 discuss trends in renting versus homeownership, stating that in recent years Columbia Heights has experienced a 6% shift from homeownership to rentals. The Center encourages the City

⁴ https://metrocouncil.org/getattachment/569232e6-f350-4265-b590-a566ce7fe32b/Areas-of-Concentrated-Poverty-in-2016.aspx

⁵ "A key challenge facing Columbia Heights – as well as Anoka County and region – is securing sufficient talent and employees for local companies. The labor market is very tight across Minnesota, and attracting and retaining talent remains a key issue for most communities. A report prepared for Anoka County in December, 2017, entitled the "Economic Development Business Recruitment and Roadmap", highlights the challenges that municipalities in the county face in attracting and retaining talent."

to go further in its analysis. How does homeownership break down by race? If significant disparities exist, what strategies could address this?

Pages 4-70 includes a discussion of race and ethnicity and housing. The Center encourages the City to clarify this section because it conflates ethnicity, race and immigration. While these concepts are related, they are also distinct. Lumping together people in these categories erases the multiplicity of people who are non-white and non-US-born. Without a detailed understanding of the communities and their unique needs, it is not possible to create and implement effective policies.

A more accurate analysis would illuminate the differences and intersections among race, ethnicity and immigration with data. For example, what percentage of People of Color in Columbia Heights are immigrants? And what ethnicities are they? Furthermore, the analysis needs to go beyond the categories of "Asian" and "East African" to identify the specific languages and ethnicities. Similarly, what is the composition of US-born People of Color and indigenous people living in Columbia Heights?

On pages 133, the discussion should be labeled Northstar "Commuter" Rail, not "Community" Rail. Also, the discussion should be in the present tense (not the future) since it is in operation.

In the section on public transit, the Center encourages the City to identify the number and location of car-free households in Columbia Heights. Furthermore, this section provides a prime opportunity to show the ACP map and how it relates to current and future transit services.

About the Center for Economic Inclusion

The Center for Economic Inclusion is the nation's first organization dedicated exclusively to advancing inclusive growth to achieve regional prosperity. By elevating data-driven promising practices, advocating for inclusive policies, coordinating cross-sector, community-driven development, and piloting strategies that truly close racial and economic gaps, we partner across communities and sectors to shape a Minneapolis-Saint Paul regional economy that works for everyone. We can unlock our region's potential by connecting people, jobs, and opportunity through housing and transit, entrepreneurship and investment, and fair wages and talent development. To do so, the Center connects communities excluded by Race, Place, and Income with cross-sector leaders to cooperatively design an inclusive and exciting new blueprint for growth that leverages both market forces and our region's diversity.

We understand the role you play in shaping local and regional prosperity and an excellent quality of life. We're eager to partner with you to unlock our region's full potential and create a region that thrives because of our diversity not in spite of it. Together, we *can* create an economy that works for everyone.

Thank you for your leadership and your consideration,

Tawanna A. Black

Founder & CEO, Center for Economic Inclusion