



January 9, 2019

Mayor Melvin Carter
Saint Paul City Council
Dr. Bruce Corrie, Planning and Economic Development

RE: City of Saint Paul 2040 Comprehensive Plan

The Center for Economic Inclusion (the Center) appreciates the opportunity to comment on the draft City of Saint Paul 2040 Comprehensive Plan, Saint Paul for All. 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.

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

Saint Paul for All includes “equity” in three of its foundational statements:

1. As one of the eight “challenges and opportunities for the future.” Specifically, the plan states “how we grow, develop and invest over the next 20 years must be done in a way that reduces disparities in jobs, income, housing cost burden, education and home ownership.”

2. “Livability, equity and sustainability” was one of nine themes identified through the community engagement process.
3. “Equity and Opportunity” is one of ten core values that inform the vision. “We are a city where opportunities in education, employment, housing, health and safety are equitably distributed and not determined by race, gender identify, sexual orientation or age; we are a city that creates opportunities for all residents to achieve their highest potential.”

It is significant that the City of Saint Paul has recognized equity as a challenge and opportunity, a theme, and a core value in the draft plan. The Center encourages the comprehensive plan to go further by including a specific goal for creating a more racially equitable economy. It is important to have a goal because it helps to focus policies, drive implementation and structure accountability through evaluation. One of the places the draft comprehensive plan could include such a goal is among the other goals in the Land Use chapter on page 28. Additionally, the policies in that chapter that support the economic inclusion goal could be organized under it (as is done in other chapters).

Data

Saint Paul for All contains some disaggregation of data by race, especially in the housing chapter. Also, the mapping of the “Area of Concentrated Poverty with 50% or More of People of Color” (ACP50) in relation to other data visually demonstrates how race, income, and geography coincide with poverty, homeownership, and education.

The Center encourages the City to expand these analyses by:

- Providing more disaggregated data on economic inclusion, including: labor force participation, unemployment, educational attainment and others.
- Disaggregating the data by specific racial groups, rather than simply by People of Color versus whites.
- Undertaking more detailed analysis when ACP50s is used as a planning and investment tool.
- Grounding the plan’s policies in data analysis.

Our data shows that disaggregated data is required to ensure intentional goal setting, equitable investment and measurable progress, and every effort should be taken to maintain constant awareness of the data that is readily available.

Policies

Saint Paul for All contains many policies that seek to advance racial equity and economic inclusion. The Center encourages the City to build upon this approach by:

- Applying equity analyses and policies more evenly and systematically throughout the plan.
- Providing more specificity on how racial equity applies to certain policy areas.
- Connecting equity-related policies to goals, actions, resources and measures.

To more effectively bridge vision and execution, the Center suggests that the City provide more detail in the implementation chapter of the plan. In particular, the land use implementation section would be strengthened by:

- Connecting each implementation action to the comprehensive plan policies and goals it advances.

- Identifying potential indicators for measuring the success of each action.

Evaluation

Saint Paul for All includes several specific policies that include the use of an equity lens. The Center encourages the City to broaden the application of an equity lens to the implementation and evaluation of all city programs and decisions.

ADDITIONAL COMMENTS

Data

The Center supports the disaggregation of data by race in the plan. For example, in the Introduction (page 7), the plan outlines some of the disparities based on race:

“Saint Paul residents are experiencing significant gaps in education, income, employment and home ownership. In 2014, 52% of whites age 25 and older had a bachelor’s degree or higher, while only 19% of people of color were in this category. While labor participation is nearly equal between whites and people of color (72% and 68% respectively), the per capita income for whites in 2014 was three times that of people of color (\$39,344 vs \$13,856). In 2014, there was a 33% gap in homeownership between white residents and people of color (61% vs 28%, respectively).”

The plan continues by identifying the “Area of Concentrated Poverty with 50% or More of People of Color” (ACP50) in Saint Paul. Furthermore, policy LU-3 states that the City will “prioritize public investments relative to areas of concentrated poverty.” The plan notes that Saint Paul’s ACP50 “shows a concentration of the highest percentages by block group of carless households, families living in poverty, non-English-speaking households, severely cost-burdened households, and populations 25 years and older with no bachelor’s degree. The ACP50 area also exhibits the lowest high school graduation rates in Saint Paul.”

The Center supports this disaggregation of data by race, and the geographic analysis based on ACP50s. By overlaying the ACP50 map on all the data in Appendix A, one can clearly see how race, income and geography coincide with poverty, homeownership, and education. This visualization is effective in demonstrating the relationships between these factors.

However, as a planning and investment tool, ACP50s have their limitations. Originally conceived by the Metropolitan Council for region-level analysis, ACPs and ACP50s can mask a great deal of nuance when applied to the neighborhood and city levels. For one, ACP50s take attention away from disadvantaged residents in other parts of the city. Also, ACP50s are not monolithic and contain high-wealth communities and individuals within them. Finally, because the ACP50 covers a large portion of Saint Paul, it is not especially helpful in focusing resources.

The Center encourages the City to build upon the ACP50 analysis with a more in-depth analysis that disaggregates data by race city-wide (and by smaller geography, as needed). While the Introduction cites the homeownership gap between whites and People of Color (POC), the Center encourages the City to break down the broad category of POC into more specific racial categories, as the data allows. One place to start would be to disaggregate the data mapped in Appendix A to the Introduction by race, such as poverty and homeownership (similar to how the housing chapter breaks down housing cost burden and homelessness by race).

The data analysis in the housing chapter of the plan is detailed and comprehensive. The Center encourages the City to provide additional data on the current state of economic inclusion in Saint Paul in the plan, and to disaggregate this data by race. Example data sets for this analysis might include: labor force participation, unemployment, mapping of jobs in relation to communities of color, mapping of jobs in relation to transit accessibility, median household income, poverty level, high school graduation (and other educational attainment) and business ownership.

In addition to disaggregating the data in the plan, the Center encourages the City to further ground the plan's policies in data. For example, policy LU-4 seeks to minimize displacement in redevelopment areas with high-frequency transit. What specific areas are these, and how do we know? What measures are used to identify displacement risk, and what does the data tell us about those areas?

Policies

Saint Paul for All weaves the theme of social and racial equity throughout much of the plan. The Center encourages the City to strengthen this approach by:

- Applying equity analyses and policies more evenly and systematically throughout the plan.
- Providing more specificity on how racial equity applies to certain policy areas.
- Connecting equity-related policies to goals, actions, resources and measures.

Policy WR-9 provides a positive example of this approach: "Apply an equity lens to policy and funding decisions relating to providing assistance to or coordinating with owners to improve private water connections to the public distribution system." This policy effectively states how an equity lens will be applied to an aspect of water resources. Other areas of the plan, most notably the housing chapter, also provide a high level of detail about how the policies will foster equity. The Center encourages the City to include a similar level of specificity on how an equity lens will be applied to other areas of economic inclusion.

For example, Policy LU-6 states "Foster equitable and sustainable economic growth by:

1. facilitating business creation, attraction, retention and expansion;
2. supporting family-sustaining jobs and enhancing workers' skills to excel at those jobs;
3. growing Saint Paul's tax base in order to maintain and expand City services, amenities and infrastructure;
4. proactively directing new development to high-priority geographies, such as Neighborhood Nodes, ACP50 Areas and Opportunity Sites;
5. encouraging cultural and arts-based businesses and business districts, such as Little Mekong, Little Africa, Rondo and the Creative Enterprise Zone;
6. supporting business, real estate and financial models that keep more money locally, such as locally-owned businesses, local-prioritized employment, employee-owned businesses and commercial land trusts;
7. building and expanding neighborhood economic and cultural assets through the development of the local micro-economies of our Neighborhood Nodes;
8. enhancing vibrant downtown neighborhoods and connecting them to the Mississippi River;
9. developing programs and funding sources for site acquisition and parcel assembly; and
10. integrating Saint Paul's historic resources into neighborhood-based economic development strategies."

How will these actions foster and sustain equitable economic growth? How will the City apply an equity lens to this policy? Which of the seven goals in the land use chapter does this policy support? Which of these actions will be focused on communities of color? Which ones will be applied evenly, city-wide? The Center encourages the City to expand upon this policy with a more detailed discussion of how it will advance equity and economic inclusion.

Policy PR-12 states “Ensure Parks and Recreation staff reflect the demographic diversity of a dynamic city to better inform decisions regarding operations and facilities.” The Center applauds this policy and agrees that greater diversity can create more inclusive decisions. But why limit this policy to Parks and Recreation staff rather than all city departments? Also, why not seek to match staff diversity to that of the City of Saint Paul (rather than “a dynamic city”)? A revised policy might read: “Ensure all City of Saint Paul staff reflect the demographic diversity of the city to better inform decisions.”

Policy H-20 states “Collaborate to reduce racial disparities in homeownership that could be attributed to unequal access to fair lending or intentional steering to specific neighborhoods.” The Center applauds the City for this policy to reduce racial disparities in homeownership. However, it is not clear why it limits City action to disparities that are based on unequal access to lending or intentional steering to specific neighborhoods. Are there data to show that these are the primary drivers of the homeownership gap? What role does the difference in generational wealth play?

Policy H-56 states “Improve the stability and health of communities of concentrated disadvantage by implementing place-based investments, such as public infrastructure, improvements and maintenance.” The Center encourages the City to clarify this policy. What does “concentrated disadvantage” refer to? How does it relate to the ACP50? If H-56 is referring to a similar geographic area, how does this policy differ from LU-3? The Center encourages the city to clarify the relationship between these policies.

Evaluation and Implementation

Saint Paul for All includes several commitments to use an equity lens in decision-making and evaluation, including:

- “Apply an equity lens to policy and funding decisions relating to providing assistance to or coordinating with owners to improve private water connections to the public distribution system” (WR-9).
- “Consider a process to further evaluate and monitor equitable distribution of community amenities.” (Item 11 in the Land Use Chapter implementation table).

The Center encourages the City to broaden the application of an equity lens to the implementation and evaluation of all city programs and decisions.

The Center also encourages the City to provide more detail in the implementation section of the plan, especially regarding the policies that seek to advance economic inclusion. The introduction to the implementation chapter includes the following among ten “general implementation” actions: “implement and regularly update the City’s Racial Equity Plan to realize and measure equity-related goals and policies.” Also, the land use chapter implementation table includes “Implement Economic Development Strategy.” How do the racial equity plan and economic development strategy work together to implement comprehensive plan policies? Where do their goals, strategies and measures overlap and diverge? Given the reality of limited resources, what among these plans and strategies will be prioritized in the near term?

To clarify these questions, the Center suggests that the City include a more detailed implementation matrix in the plan's land use section. Currently, it includes a list of actions, their timelines (short-, medium- or long-term) and a list of potential funding sources. The Center encourages the City to enhance this section by:

- Connecting each implementation action to the comprehensive plan policies and goals it advances.
- Identifying potential indicators for measuring the success of each action.

The City of Saint Paul has demonstrated a clear and compelling commitment to racial equity, and a platform for accelerating equitable growth. We applaud this plan for its articulation of racial equity goals and policies, and linkages to the resources needed to fulfill those goals. By providing a more detailed implementation section, the City can better articulate how the equity goals and policies in the plan will advance measurable changes in toward economic inclusion in Saint Paul.

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,



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