Mayor Jeffrey Lunde
Brooklyn Park City Council
Kimberley Berggren and Cindy Sherman, Community Development Department

October 26, 2018

The Center for Economic Inclusion (the Center) appreciates the opportunity to comment on the draft Brooklyn Park 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 through robust data collection, community listening and mobilization, 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

The Center applauds the prioritization of racial equity in the Brooklyn Park 2025 Goals, which inform the 2040 Comprehensive Plan draft. Specifically, one of the six goals states that the community seeks to create *"Increased Equity"* and believes that *"Partnerships that increase racial and economic equity empower residents and neighborhoods to prosper."* The Center supports this goal and would like to see it more explicitly woven throughout the plan. With a few notable exceptions, it is not clear how this goal connects to the plan's analyses, policies and strategies.

Offices: 370 Wabasha Street North
St. Paul, MN 55102

1015 North 4th Avenue, Suite 202
Minneapolis, MN 55405

(612) 351-8200
www.centerforeconomicinclusion.org

Data

In select instances, including in the analysis of homeownership, the draft Brooklyn Park 2040 Comprehensive Plan disaggregates data by race. However, disaggregation by race is not consistently applied, and these analyses are the exception to the rule. Where data are disaggregated by race, there are not often clear connections between those findings and policies that are presented.

Policies

The draft plan includes some promising policies and ideas for future partnerships that could potentially advance a racially equitable economy. Three examples include: the mixed income housing policy, a renter-to-home-ownership program, and a focus on community wealth building. The Center encourages the City to strengthen these efforts by grounding them in data, identifying resources for implementation, and committing to data-driven evaluation of their results. Moreover, the Center encourages the City to expand this approach to other policies and programs throughout the plan.

Evaluation

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

<div align="center">

ADDITIONAL COMMENTS

</div>

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

Data

Chapter 2, "Community Profile" includes demographic data about the race of residents, and those who speak a language other than English at home. However, the Community Profile does not analyze connections between race and other demographic data, such as poverty rate, household income, and education. The Center suggests that the City disaggregate data by race to identify disparities in poverty rate, household income, education and other key areas.

The Community Profile and the Housing Chapter contain maps of a "concentrated area of poverty"(ACP) in Brooklyn Park. According to the Metropolitan Council, the Brooklyn Park ACP is also an "ACP50" (an ACP with 50% or more people of color)[1]. Therefore, the Center suggests that the map should be labeled as an "ACP50" to recognize that people of color are highly represented there. Additionally, the ACP maps are not accompanied by descriptive text or context. The Center suggests that the maps include information about what it means for an area to be an ACP50, and how the City uses this designation in its analyses and policy development.

The "Regional Perspective "section of the Economic Development Chapter provides a list of ways that our region is ranked highly for its business climate. For example, the region is "1st in Job Creation Index" and "2nd Best State Overall." While these are cause for some celebration, they mask the deep, historic racial inequities within our economy. For example:

The Minneapolis-Saint Paul-Bloomington metropolitan area's Black-white income and unemployment rates lead the nation, and these rates have remained consistent over the past 10 years.
- Of the nation's top 25 metropolitan areas, we have:
    - the largest disparity between residents of color and white residents experiencing poverty;
    - the largest disparity in poverty rates between Black and white residents (the poverty rate for African Americans is 5.7 times greater than that of whites); and

- the largest racial unemployment gap (people of color are unemployed at more than 2x the rate of whites; Black residents are unemployed at almost 3x the rate of whites).
- The per capita personal income for Black metro area residents is a shocking $15,336, which is less than half the $37,943 per capita personal income for white residents.
- We have some of the nation's lowest high school graduation rates for Black, Latino, and Native students.
- The rate of business ownership for Latino and Asian residents is less than half the national average.
- Minnesota ranks as the second worst state for Black residents, based on quality of life indicators.

In recognition that the success of the regional economy is not shared by all residents, the Center recommends that the City offer a more comprehensive perspective that is reflective of the experience of all Brooklyn Park residents in the Economic Development Chapter.

Human Capital

The Center commends the City for including an analysis of unemployment by race in the "Economic Development Profile: Human Capital Development" section of the plan. Specifically, it notes that the unemployment rates of African Americans average 11% versus the overall rate of 4%. The plan goes on to attribute employment disparities to lack of educational attainment and social networks. While these factors may play a role in disparities, the Center encourages the City to go deeper to identify barriers for people of color in employment in Brooklyn Park, and to support these assertions with data. Research shows that even if education and other demographic factors were held constant, there would still be disparities between whites and African-Americans in wages and employment in our region.[2]Further exploration of the root causes of employment disparities will yield a stronger plan.

In the "Workforce Development" section, the Center supports the City's efforts to partner with private sector businesses, educational institutions and others to evaluate underlying factors and create career pipelines. Similarly, the Center supports the focus on culturally-specific workforce development.

Economic Development

The "Economic Development Profile: Business Development" section discusses the various tools and services that the EDA and City use to retain, attract and support local businesses. Some of these are financial investments (TIF, BPDC Revolving Loan Fund), while others allocate staff time (technical assistance via the "Open to Business" program). The Center encourages the City to evaluate these policies and programs on people of color. What individuals, communities and neighborhoods benefit? Who is left out of these investments? With that data in hand, how could these tools be focused to empower communities of color?

The Center applauds the City for committing to identify opportunities to implement community wealth building strategies. The Center supports the potential partnership with Nexus Community Partners and urges the City to move beyond discussion into implementation, especially in supporting business cooperative ownership models. Moreover, the Center encourages the City to use community wealth building as a lens to view other aspects of the city's economic development and workforce development programs, not as a separate initiative.

Transit and Access

The Center applauds the analysis of homeownership by race in the Housing Chapter, and the related implementation strategy, and encourages the City to replicate this data-driven approach to policies throughout the plan. Furthermore, the Center urges the City to dedicate resources and staff to implement this potential homeownership program, and to regularly evaluate its impact on people of color in Brooklyn Park.

The "Summary of Existing Housing Needs" section misses opportunities to dig deeper into issues by disaggregating data by race. For example, the Center recommends that the City includes an illustration of the racial disparities in the analysis of the foreclosure crisis, housing cost burden and other key areas.

The Transportation Chapter includes no analysis of transit accessibility by race, income or car ownership status. The Center urges the City to use mapping and data analysis to identify how communities of color are served by current transit service and planned investments. Transit access is one potential application of the ACP50 designation; how quickly can residents of the ACP50 reach employers in Brooklyn Park and regional job centers via transit? Where are the gaps? These are analyses that can inform City policies and programs in housing, economic development and transportation.

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

---

[1]https://metrocouncil.org/getattachment/569232e6-f350-4265-b590-a566ce7fe32b/.aspx
[2]https://metrocouncil.org/getattachment/5434bfbe-f520-4ef2-a54e-e698f58ca49e/.aspx