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MEMO:
Amending the West Side Community Plan
to add the WSCO Equitable Development Scorecard as an Appendix

To: Saint Paul Planning Commission
From: Comprehensive and Neighborhood Planning Committee
Date: January 24, 2020

Summary

Over the last two years, the West Side Community Organization (“WSCO”) developed an Equitable Development Scorecard (“scorecard”) to use in evaluating development proposals in District 3. The resulting score can be used by WSCO in formation of its recommendation to the City when it reviews zoning applications for development proposals in District 3.

The Planning Commission held a public hearing on the matter on December 6, 2019. One representative from WSCO spoke in support of the amendment. Four emails were received by end of the public hearing record on December 9, two in support and two in opposition to the amendment. On December 18, 2019 the Comprehensive and Neighborhood Planning Committee reviewed the public comment and recommended the amendment be sent to the full Planning Commission unmodified for review and a vote of recommendation to the City Council.

Contents

The scorecard is adapted from the Equitable Development Principles & Scorecard developed by the Alliance for Metro Stability and various neighborhood organizations in 2016, adapted by WSCO for the District 3 community.

After introductory comments on community values and the history of the West Side, the body of the scorecard begins with instructions on its usage and a page for basic project information (including whether the project benefits from public investments). Five categories follow – Community Engagement, Equitable Housing, Environment, Economic Development/Land Use, and Transportation. Within each category is a list of WSCO policy goals, the fulfillment of which are rated from 1 to 5. WSCO’s policy goals include statements such as “Promotes traffic calming and pedestrian safety. The project prioritizes the routes and paths that pedestrians and bicyclists naturally and easily use” and “Developers have completed a culture and history tour of West Side with a West Side Community Organization member.”

Points from each policy goal are summed per category and then totaled and divided against the maximum points possible to produce a final percentage score.

The scorecard closes with a glossary of terms, a bibliography, a list of resources, and a template for a Community Benefits Agreement intended to ensure the proper treatment of employees of developer subcontractors.

Linking Language, Process, and Authority

Through the following language in the West Side Community Plan, the City will recognize the scorecard as WSCO's tool for commenting on development proposals seeking City zoning approvals. The following language has been approved by Planning staff and WSCO:

“Appendix A to this Plan is the West Side Community Organization’s (WSCO) “Equitable Development Scorecard” which can be submitted to the City by WSCO as its evaluation of development proposals within District 3. The Scorecard’s criteria assess the extent to which WSCO finds that principles and practices of local community empowerment, fair and just project operations, environmental justice, and housing affordability are demonstrated by a development proposal. WSCO uses the resultant score to inform its recommendations to the City regarding the development proposal.”

The scorecard and its score exist as advisory comments which form WSCO's recommendation to the City. WSCO is free to include any material, including the completed scorecard, when making its recommendation to the City regarding the impact of a development project in District 3. The scorecard and its score are not to be substituted for the findings the City must make when considering zoning applications.

Planning Commission Public Comment

The Comprehensive and Neighborhood Planning Committee has reviewed the public comment submitted to the Planning Commission and recommended to the Planning Commission that no change be made to the Scorecard. Below is a summary and analysis of the public comment.

- A. **In support:** WSCO executive director Monica Bravo answered Planning Commissioner questions regarding the formation of the scorecard. Ms. Bravo reported that five developers had been consulted during the formation of the scorecard to ensure a fair and reasonable scoring. Ms. Bravo said that WSCO had not considered applying this scorecard to individual single-family home properties and projects. Ms. Bravo reiterated the scorecard's emphasis on the vitality of the “cultural landscape” rather than “neighborhood character”.

Additionally, letters of support were emailed to Michael Wade, City Planner, by Monica Marrocco with names and addresses of other supporters, and by the Alliance for Metropolitan Stability. The letters reflect on the community input process that went into the formation of the scorecard.

- B. **In opposition:** Craig David, resident of District 3, sent two emails to the Planning Commission. The first email included a letter of Mr. David's thoughts and a news article on the controversial results of gentrification. The second email, sent December 8, included a rewritten version of Mr. David's previous letter and included a list of supporters who had lent their names and addresses. The second letter will be discussed as a refined version of the first.

The letter confirmed support for “a majority of the scorecard”, but made seven additional requests, discussed below:

- i. **Include the “principles of equitable development” from the original scorecard produced by Alliance for Metropolitan Stability.** These principles include “equitable community engagement”, “equitable land use”, “equitable transportation”, “equitable economic development”, and “equitable housing”, which are also the categories of WSCO’s scorecard, displaying direct inclusion. The Alliance’s scorecard includes a one-to two-sentence definition of each. These definitions appear to be in harmony with WSCO’s scorecard and may contribute to clarification, though this purpose was not elucidated in Mr. David’s letter.
- ii. **Reconsider verbiage in the scorecard’s “Anti-Displacement and Anti-Gentrification” section.** Mr. David’s main point is that investment in the West Side is desired by many West Side residents, and he feels the scorecard goes too far in dissuading investment. He writes, “[W]e would like the SCORECARD to also embrace redevelopment and revitalization that benefits and improves the community.”

This section of WSCO’s scorecard outlines phases of gentrification: A) disinvestment; B) drop in property values; C) displacement resulting from a rise in property values due to re-investment; and D) a rise in property values to a price that excludes lower-income residents from moving into the area. It is followed by statements supporting investment without displacement. While the scorecard authors could consider adding mention of re-investment as an independent phase before the C) displacement phase in clearer recognition of the possibility of investment without displacement, the scorecard neither bans redevelopment nor ignores the possibility of investment without displacement.

- iii. **Tailor the scorecard to allow redevelopment that will raise home values on the West Side.** Mr. David states, “We feel that a total Anti-Gentrification stance may threaten home equity. The SCORECARD must ask questions that guide the sort of investment the community needs and desires, through ventures that protect and enhance our current equity.” Mr. David brings up private home values (“capital assets”) as an object which is in the community’s interest to protect and raise, and the enhancement of which could be impeded by the scorecard. Mr. David brings up the historical lag in housing value growth on the West Side as context for this concern.

The scorecard states: “[The scorecard] is used to make sure that the principles and practices of fair and just development, environmental justice, and affordability are applied to our community and that plans for economic development and wealth creation benefit all West Siders.” While investment in one’s privately-owned house and property is a major financial decision that is linked to neighborhood context, this scorecard’s explicit task is agnostic to the return on investment on individual homes, concerning itself instead with housing affordability across the district. Regarding the argument put forth about a historical lack of investment or lag in housing values in the area, these are due to independent to market forces. In the scorecard’s use so far, it has not proven a deterrent against development projects as much as a community statement and negotiating document. Mr. David and supporters’ desire to see the scope of the scorecard expanded is between them and WSCO.

Regarding the City’s position in the 2030 *City of Saint Paul Comprehensive Plan* and the proposed *Saint Paul For All 2040 Comprehensive Plan*, both plans are replete with policies that promote housing affordability, expand diverse housing options, and encourage access to homeownership, and no policies mention increasing private home equity. Concerning social equity, the *Saint Paul For All 2040 Comprehensive Plan* states: “How we grow, develop and invest over the next 20 years must be done in a way that reduces racial disparities in jobs, housing cost burden, education and homeownership.” The City is considering this scorecard based on it and WSCO’s shared interest in addressing (social/racial) equity and reducing disparities.

- iv. **“Better address the repurpose of existing commercial stock and development of new commercial corridors, thus helping to create community equity and vibrancy.”** In this section, Mr. David laments a lack of investment in existing commercial buildings and corridors and states the scorecard should address these issues. The connection between repurposing of existing commercial stock and social equity is not explained. While repurposed buildings may contribute to reinvestment in disinvested communities, Mr. David does not lay out in what way the scorecard might address this reality when applied to a specific project brought to WSCO for evaluation.
- v. **“Add questions that support investments, ... protect and enhance ... current equity and build a vibrant community.”** Mr. David’s statement appears to regard this document as a proactive document that is intended to promote development in the West Side, rather than an analytical policy tool that is applied to a development proposal by WSCO once interest is shown. A distinction should be made between the intent of this evaluative scorecard and that of a proactive economic development strategy involving activities that “bring outside interest in financing quality projects”.
- vi. **“Speak to building visionary, well-designed buildings with quality materials.”** In this section, Mr. David asserts that architectural quality is an issue of equitable community development. His argument considers the quality of a *place* as a public matter, and that the scorecard “must add questions that grade the life span of the project, the quality of the materials, and especially the vision in use and community interface that the project will represent.” The implication is that low-income communities receive poorer-quality *places*, and that this constitutes an injustice.

Currently, the scorecard considers aesthetics only under the heading “Economic Development/Land Use”, *line (h)*: “Design contributes to distinct identities of local cultural heritage through the presence, preservation, or addition of architectural assets with Universal Design.” This line focuses on a community culture or identity which, while still conceptually broad, offers support for WSCO and neighbors to more specifically discern whether proposed architectural/designs are rooted in cultural or design precedent. However, with a maximum point value of five out of a possible 205 total points, aesthetic design is given low importance by the scorecard.

One equity-related perspective on this argument is the academic discussion of “aesthetic justice”. The aesthetic justice argument states that the public should have a say in the formation of their built environment. This assertion is based on the premises that A) the

public is affected psychologically and emotionally by both publicly- and privately-owned and developed structures, and B) those with less means are less able to remove themselves from aesthetically unpleasant areas. Aesthetic justice includes *how* aesthetic decisions are made (whether everyone in an affected local community have influence over projects affecting the built environment) and *what* the resulting aesthetic environment is. The scorecard addresses this topic obliquely in the above *line (h)* from the perspective of local culture and community identity.

Regarding the importance of aesthetic design in City policy: The subject of *place* looms large in urban planning spheres. Public art is a popular method of thoughtfully incorporating distinctive, humanizing physical features into the public realm and publicly-financed development projects. (The City’s public art ordinance dedicates 1% of many sources of City funding for capital projects to incorporate a public art component.) The design of privately-funded architecture, however, outside of Historic Districts, is regulated under Sec. 63.110 of the Zoning Code’s Building Design Standards, as well as with additional design standards in certain zoning districts (such as T Traditional Neighborhood and IT Transitional Industrial districts) and in these sections, regulated only very generally.

The Land Use chapter of Saint Paul’s current (2030) Comprehensive Plan does highlight aesthetics in “Strategy 3: Promote Aesthetics and Development Standards”. Summarizing this strategy, the Plan reads:

As Saint Paul continues to revitalize itself and to grow, it must be an attractive place to live, work, and visit. This strategy provides a framework for design and aesthetics that will engage people and help integrate the built environment into the community. (p. LU6)

This strategy rests largely on implementing pedestrian-scale design standards which include simplified elements such as land use diversity, shorter block length, buildings anchoring the corners of their block, front yard landscaping, building façade continuity and articulation, height, materials and detailing, parking placement, lighting, and street trees, and others. These standards are applied to Traditional Neighborhood zoning districts. The current Comprehensive Plan, however, does not address aesthetics from a social equity perspective.

While a discussion of aesthetic justice deserves further inquiry, because WSCO, as the officially-designated District Council representing District 3, has not identified this a potential cause of displacement or disproportionately negative impact on vulnerable stakeholders, and because the author of the letter has not presented a case describing how encouraging “visionary, well-designed buildings” would help avoid displacement or disproportionately negative impact on vulnerable stakeholders, staff finds that aesthetic justice is not a direct social equity concern for District 3, and that incorporating the scorecard into the West Side Community Plan without additional consideration of aesthetic justice is not at odds with the City’s Comprehensive Plan.

- vii. **Add an additional scoring category regarding perception of the development.** This category, called “tacit”, consists of some highly subjective statements that affect the

perceptual environment created by the evaluated development proposal, as well as some more direct but individual questions such as “do you want this built across the street from your home?”

While very directly assessing the sentiment of respondents, the lines in this category act as a survey of opinion rather than a scorecard concerning issues of social equity. Staff considers this category ineffective as a tool to measure the social equity impact of a development and therefore inappropriate to include in this Equitable Development Scorecard and the West Side Community Plan.

Committee Recommendation

The Comprehensive and Neighborhood Planning Committee recommends that the Planning Commission forward the amendment to the City Council with a recommendation of adoption.

ATTACHMENTS

1. Planning Commission Resolution
2. Equitable Development Scorecard
3. West Side Community Plan pages 1-4
4. WSCO Draft Equitable Development Scorecard Usage Guidelines (not part of scorecard)
5. WSCO Draft Scorecard Committee Nomination Form (not part of scorecard)