St. Louis Park
MINNESOTA
Experience LIFE in the Park

AGENDA
DEC. 12, 2022

Members of the public can attend the meeting in person, watch by webstream at bit.ly/watchslpcouncil, or watch on local cable (Comcast SD channel 17/HD channel 859).

Recordings are available to watch on the city's YouTube channel at https://www.youtube.com/user/slpcable, usually within 24 hours of the end of the council meeting or study session.

6:30 p.m. STUDY SESSION – council chambers

Discussion items

1.	60 min.	REI system intro
2.	30 min.	Diversity, Equity, and Inclusion Policy in Development Projects

Written reports

3.	Housing and Neighborhood-Oriented Development Systems Discussion Wrap-up
4.	2023 sustainability division programs and budget
5.	2040 comprehensive plan implementation update
6.	2023 Pavement Management Project – Lenox, Oak Hill, Texa-Tonka and Eliot View
7.	MnDOT excess land update – Toledo Avenue and 28th Avenue
8.	Title VI Plan framework

The agenda is posted on Fridays on the official city bulletin board in the lobby of city hall and on the text display on civic TV cable channel 17. The agenda and full packet are available after noon on Friday on the city's website.

If you need special accommodations or have questions about the meeting, please call 952.924.2505.

Executive summary

Title: REI Systems Introduction

Recommended action: No action is recommended at this time. The purpose of this discussion is to provide an overview of the topics and concepts that will be introduced during the system.

Policy consideration: No policy consideration currently.

Summary: The report and accompanying presentation outlines the path the city of St. Louis Park has taken in its race, equity, and inclusion work. Specifically, it builds understanding of the issues in our organization and intentionally and proactively introduces measures that break down barriers to creating a just and inclusive community.

- Council members will learn how the race, equity, and inclusion team is normalizing, organizing, and operationalizing goals and strategies to address the citywide priority for advancing racial equity for staff and the community at large.
- Council members will learn how the race, equity and inclusion team is providing leadership and direction to support measures that break down barriers in creating a more just and inclusive community for all.
- Council members will learn about the hiring of two specialists and Council Members will learn about infrastructure, training and development opportunities for the city manager, council, boards/commissions, staff, and the community at large to raise one's racial consciousness and build capacity for ongoing work in racial equity.

Financial or budget considerations: Not at this time. Three race, equity and inclusion full time employee salaries are included in the work outlined in this report.

Strategic priority consideration: St. Louis Park is committed to being a leader in racial equity and inclusion in order to create a more just and inclusive community for all.

Supporting documents: NA

Prepared by: Radious Y. Guess, race equity and inclusion director
Approved by: Kim Keller, city manager

Discussion

Background:
As an organization, St. Louis Park formally began its race equity and inclusion journey in 2017 with participation alongside other local government agencies in The Government Alliance on Race and Equity (GARE). This national network of governmental organizations works to achieve racial equity and advance opportunities for all. At the time, the demographics of St. Louis Park as a city were White 81.2%, Indigenous 0.39%, Black 7.34%, Asian 3.80%, Hispanic 3.29% and other 2.62%. This has shifted over the years. Current demographics show that are demographics are White 77.13%, Indigenous 0.48%, Black 7.91%, Asian 4.13%, Hispanic 5.3%, and other 4.4%.

Race equity and inclusion (REI) staff were introduced to the city workforce in 2018. Over the years, the roles have continued to evolve and the number of staff dedicated to the work has grown. This recognizes both the complexity of the work and the growing understanding of city leadership that racism and discrimination in all forms are both persistent and pervasive.

Key important partnerships and activities, at the city-wide level, have included:

1. Council members completed the IDI Assessment – the Intercultural Development Inventory Assessment measures both where you think you are interculturally (perceived orientation) and how you navigate cultural differences (developmental orientation).
2. St. Louis Park leaders were introduced to Race Forward – Founded in 1981. Race Forward brings systemic analysis and an innovative approach to complex race issues to help people take effective action toward racial equity. Race Forward along with the Center for Racial Inclusion catalyzes community, government, and other institutions to dismantle structural racial inequity and create equitable outcomes for all.
3. St. Louis Park leaders collaborated with League of Minnesota Cities and other partners like GARE to promote excellence in local government.
4. Inclusion of race equity modules as part of city council retreats.
5. Development of Employee Resource Groups and the Race Equity Employee Leaders (REEL) Team. These internal stakeholder groups serve as a source of fellowship/allyship, reference, opinion, and advice on critical political and social issues that arise in the workplace and community at large.
6. City wide training by external consultants and REI staff

Present considerations:
An organizational reorganization in 2022 provided an important way to realign the structure while explicitly utilizing a race equity and inclusion lens. As part of the wider reorganization, the city manager established a Design Team of city staff to guide a consultant in evaluating the city's staffing structure, roles, and responsibilities/authority level related to REI work. This design team further advised the city manager in the building-out of relevant programming for 2022 as the Race Equity and Inclusion director was hired and onboarded. Key facets of the internal current state include:

1. An organizational structure where the REI director reports to the city manager and all three REI roles are shifted from a combination of direct service and capacity-building to a more sharpened capacity-building focus. This has meant moving some work to other teams throughout the city, which results in REI work being further embedded in the fabric of city operations.

2. Committing to a suite of consultant-led REI work focused on moving the work forward in an intentional way while the REI director assesses readiness and programming and develops the path forward. This consultant-led work includes:
    a. Over 200 staff participated in the Racially Conscious Collaboration Foundations course. This was a full-day workshop where staff learn how to use the RCC tool first as a guide for personal positive racial identity development, then as a roadmap for effective cross racial dialogue with others, and finally as an assessment tool for diagnosing and guiding conversations about race.
    b. RCC for Executives (RCCE): The entire city leadership team is participating in RCCE. St. Louis Park leaders are learning to place antiracism at the center of their city leadership responsibilities including leading change within their work teams and sustaining healthy cross-racial dialogue in communication with the City Council, in their leadership of managers, front-line leaders, and in public-facing interactions.
    c. RCC Collaborator™ Certification: Fourteen employees from all levels of and across the organization have participated in a Collaborator certification. Collaborators act as informal change agents within their departments and will assist the REI team with facilitation.
    d. Executive Coaching: Five leaders are receiving one-on-one coaching to address predictable personal, professional, and organizational restraining and driving forces to the change plan.
    e. Just Policing: This interactive program equips command staff, sergeants and field trainers to take a racially conscious approach to police policies, operations, and interactions.
3. The REI director has developed an educational curriculum and internal facilitators (include Collaborators and leaders from the city's ERGs and REEL team) are being trained to introduce the curriculum to city staff in 2023.

Future state:
We will use promising practices to advance race, equity, and inclusion in all aspects of our decision-making processes. City staff will be encouraged to take social responsibility for the development of a trusting workplace environment that is essential to the foundation of an organization whose community is characterized by racial, ethnic, and cultural diversity. We will use a racial equity framework along with common language for authentic dialogue so we can build a sense of community which encourages such dialogue. Professional learning communities will be introduced as a strategy to advance race, equity, and inclusion within and around the city of St. Louis Park. Lastly, we will explore why an introduction to individual, institutional and structural racism is critical to the definition and commitment of race, equity, and inclusion for the City of St. Louis Park. To achieve this, the following action steps are planned for 2023:

1. Hiring two REI specialists
2. Defining race, equity, and inclusion and developing policy for the city.
3. Providing leadership and direction for achieving the city's strategic priority for advancing racial equity.
    a. Develop and implement strategic plan to advance racial equity for staff and council.

   b. Assist staff in ensuring racial equity is considered for new and existing programs and policies by developing toolkits and providing data, support, and recommendations.
   c. Support leadership in the establishment of an ongoing work in organizational equity initiatives, objectives, and strategies for advancement of racial equity.
4. Serving as citywide consultants on racial equity matters.

5. Launching a year of learning year for St. Louis Park staff using a hyflex/hybrid train the trainer model.

6. Title VI – The REI director will be assigned as the city's official Title VI coordinator to ensure the city complies with the Title VI Program and will ensure staff understand Title VI of the Civil Rights Act of 1964 and how it may apply to their work.
   a. Information regarding the city's commitment against discrimination will be posted in all buildings where public meetings are held and on the city's website. The notice provides contact information for the city's REI division/department and how to file an official complaint if someone believes they have been discriminated against.

Next steps: This report kicks off the race, equity, and inclusion study session series.

Executive summary

Title: Diversity, Equity, and Inclusion Policy in Development Projects

Recommended action: Review and discuss the Diversity, Equity, and Inclusion Policy.

Policy consideration:

- Does the policy meet the expectations and intent of the EDA/council?
- Does the EDA/council support the adoption of the DEI Policy?

Summary: The city recognizes the importance of creating opportunities for women, black people, indigenous people, people of color (BIPOC), and Asian Americans and Pacific Islanders (AAPI) to participate more equitably in the workforce and benefit from wealth building opportunities. It is recognized that historical and institutional discrimination and racism has disproportionately created challenges for women and BIPOC/AAPI communities. Women and BIPOC/AAPI individuals and businesses have faced discrimination and disadvantages in employment and business opportunities which have resulted in significant disparities in wealth building opportunities.

In response to these inequities and disparities, city staff created a Diversity, Equity, and Inclusion (DEI) policy to be applied when reviewing development projects. The goal of this policy is to promote inclusive and equitable opportunities for women and BIPOC/AAPI individuals and businesses to provide opportunities to enable them to build wealth. The policy provides specific goals for the hiring of women and BIPOC/AAPI business organizations, business enterprises, workforce, and peripheral enterprises for all new and renovated commercial and multifamily residential buildings receiving EDA/city financial assistance.

The EDA/city council received a staff report on this policy in March 2022. Since that time the policy has been placed into effect for all new projects receiving $200,000 or more in financial assistance from the EDA or city funds. The policy has recently been reviewed by the city's race equity and inclusion director, who recommends some minor updates to language, specifically changing "non-white" to "BIPOC/AAPI". Staff also recommends increasing the workforce goals for women from 6% to 20% to better align with state and county goals for Hennepin County.

Financial or budget considerations: The cost of implementing and tracking race, equity, and inclusion goal requirements adds increased overhead expenses to project costs. While DEI policies are becoming more commonplace in developments, the EDA/city's policy includes the tracking of women and BIPOC/AAPI workforce, which is above and beyond what other jurisdictions currently require. This metric will likely add additional project costs which will be included in any financial analysis performed by the city's financial consultant, Ehlers. Additional city staff time will also be required for monitoring and compliance.

Strategic priority consideration: St. Louis Park is committed to being a leader in racial equity and inclusion in order to create a more just and inclusive community for all.

Supporting documents: Discussion; Diversity, Equity, and Inclusion Policy

Prepared by: Jennifer Monson, redevelopment administrator
Reviewed by: Karen Barton, community development director
Radious Guess, race equity and inclusion director
Greg Hunt, economic development manager
Approved by: Kim Keller, city manager

Discussion

In response to discussion and direction provided at the August 16, 2021 Special Study Session, staff drafted a Diversity, Equity, and Inclusion (DEI) policy ("Policy") which promotes the inclusion of under-represented persons and businesses in development projects to meet the city council's strategic priority of being a leader in racial equity and inclusion in order to create a more just and inclusive community for all.

The DEI Policy was reviewed by the city attorney and EDA legal counsel. Based on their legal advice, the DEI Policy is not able to include requirements, but rather establishes goals to create more opportunities in the development community for historically under-represented women and black people, indigenous people, and people of color (BIPOC), and Asian Americans and Pacific Islanders (AAPI). Similar to other EDA/city policies, the development must comply with the DEI Policy in effect at the time of the application date of planning and zoning applications and/or signed preliminary development agreements.

Additionally, the local development community was asked to review and provide feedback on the policy, including market rate and non-profit developers with approved projects in St. Louis Park. Specifically, this policy was reviewed by Sherman Associates and their contractor Frana which is developing the Beltline Station Development, Opus Development Group which is developing and building Beltline Residences, Saturday Properties and Anderson Companies which are jointly developing the Wooddale Station development, Project for Pride in Living and their contractor for the Union Park Flats development, and Common Bond which is developing the Rise on 7 project.

In general, the developers with which community development staff communicated were supportive of the policy goals and offered feedback that was taken into consideration when drafting the DEI Policy.

The EDA/city council received a staff report on this Policy in March 2022. Since that time the Policy has been placed into effect for all new projects receiving $200,000 in financial assistance from the EDA or city funds. The Policy has recently been reviewed by the city's race equity and inclusion director, who recommends minor updates to the language, by changing "non-white" to "BIPOC/AAPI". Staff also recommends increasing the workforce goals for women from 6% to 20% to better align with the goals of the state and county for the metro area.

Present considerations: The Policy sets goals for the hiring of women and BIPOC/AAPI business organizations, business enterprises, workforce, and peripheral enterprises for all new and renovated commercial and multifamily residential buildings receiving $200,000 or more EDA/city financial assistance.

The goals for business organizations and business enterprises are similar to the goals established in Minnesota Housing's *Minority or Women Business Enterprises Compliance Guide*. These goals are increasingly becoming well known and more widely implemented by Twin Cities area developers and contractors. As a result, area companies have developed systems for tracking and reporting these metrics for metro cities and state agencies.

In addition, the Policy includes goals for workforce and peripheral enterprises to include opportunities for women and BIPOC/AAPI construction workers and other businesses hired by the developer in connection with the development (attorneys, financial consultants, accountants, etc.). The workforce goals are similar to Hennepin County's goals while the peripheral enterprise goals are unique to St. Louis Park. The above developers reviewed these goals and expressed willingness to track and report on these metrics. They also indicated that implementation of these goals would likely add to the overall costs of projects in the city. Developers will be made aware of the Policy goals at the outset so that they can factor the costs of compliance into their proposed project proformas.

Participation Goals	Women	BIPOC/AAPI
Business Organization	10%	13%
Business Enterprises	6%	13%
Workforce	20%*	32%
Peripheral Enterprises	6%	13%

*Increased from 6%

Approved Businesses: The Policy itself does not specify the lists of verified women and BIPOC/AAPI businesses to which developers will be referred, but approved lists will be included in the Policy's user guide. Two lists have been requested to be included by developers. These lists include the Disadvantaged Business Enterprises (DBE) list found on the Minnesota Unified Certification Program website (www.mnucp.org), and businesses approved by the Central (Cert) Certification Program, which is a small business certification program recognized by Hennepin County, Ramsey County, the City of Minneapolis, and the City of St. Paul. The Cert list is found online at www.cert.smwbe.com. Women and BIPOC/AAPI-owned businesses can apply to both lists through the Minnesota Small Business Certification Portal. The lists may be modified and additional lists may be added in the future.

The MNUCP DBE program is for "business owners that are socially and economically disadvantaged. Women and African Americans, Hispanics, Native Americans, Asian-Pacific and Subcontinent Asian Americans are presumed to be socially and economically disadvantaged." This program also may qualify other individuals as socially and economically disadvantaged on a case-by-case basis. Per the website, "to be regarded as economically disadvantaged, an individual must have a personal net worth that does not exceed $1.32 million. To be seen as a small business, a firm must meet Small Business Administration size criteria and have average annual gross receipts not to exceed $23.98 million when averaged over a three-year period. The owner must have technical competence and experience directly related to the type of work in which certification is being sought and must be a United States citizen or a lawfully admitted permanent resident of the United States."

To be considered an eligible women or BIPOC/AAPI owned business in the CERT program, the business must be at least 51% owned by one or more women or BIPOC/ AAPI persons and has its management and daily business operations controlled by one or more women or BIPOC/ AAPI persons who own it. Additionally, the business must be at least 51% owned by one or more native or naturalized U.S. citizens, or lawfully admitted permanent residents of the United Stations; is not a broker or manufacturer's representative, does not operate as a franchisee or under a franchise agreement, and is not a business in which the owner is also owner or part

owner of one or more businesses that dominate the same field of operation; performs a commercially useful function; and has been in operation for at least one year, or in operation for less than one year and is able to provide documentation showing that it has an established record of generating revenue.

Reporting: The Policy establishes a quarterly reporting period, which commences at the date a development agreement is entered into until six months following the city-issued certificate of occupancy. The policy lists the minimum reporting categories including:

- total number of construction-related business enterprises, the percentage of those that are women and BIPOC/AAPI owned, and the percentage of total development dollars paid to those business enterprises;
- total number of construction workforce employees, the percentage of total women and BIPOC/AAPI employees, and the percentage of total construction hours women and BIPOC/AAPI workforce employees worked;
- the list of peripheral enterprises and the percent of women and BIPOC/AAPI employees; and
- a summary of efforts made to reach the participation goals.

In addition, reporting will be required on contracts and procurement specifying efforts to award contracts to BIPOC/AAPI and women-owned business enterprises.

Effective date: The Policy took effect on March 29, 2022 for all newly submitted projects requesting financial assistance from the EDA/city. The Policy does not apply to applications previously submitted or projects not requesting financial assistance.

Next steps: The EDA/city council is requested to provide feedback on the Policy during the December 12, 2022 study session, and determine whether it should be formally adopted.

Previous/future actions	Governing body	Date
DEI – Report	EDA/City Council	8-16-21
DEI – Report to place policy into effect	EDA/City Council	3-28-22

Effective December 12, 2022 ~~March 29, 2022~~

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Diversity, Equity, and Inclusion Policy

This policy promotes the inclusion of under-represented persons and businesses in development projects receiving public financing through the Economic Development Authority ("EDA") and City of St. Louis Park to meet the city council's strategic priority of being a leader in racial equity and inclusion in order to create a more just and inclusive community for all.

The city recognizes the importance of creating opportunities for communities of color and indigenous people to participate more equitably in the workforce and benefit from wealth building opportunities. It is recognized that historical and institutional discrimination and racism has disproportionately created challenges for women, Black, Indigenous, and People of Color (BIPOC), and Asian American and Pacific Islander (AAPI) communities. Women and BIPOC/AAPI individuals and businesses have faced discrimination and disadvantages in employment and business opportunities which have resulted in significant disparities in wealth building opportunities.

The goal of this policy is to address these disparities and to promote inclusive and equitable opportunities for women and BIPOC/AAPI individuals and businesses to build wealth.

The goals set forth in this policy further the city's racial equity priorities. These goals are intended to provide an incentive for developers to seek greater participation by women and the BIPOC community in development projects funded with EDA/city financial assistance.

These goals are included in the list of minimum qualifications for projects seeking tax increment financing (TIF) assistance from the St. Louis Park Economic Development Authority.

This policy shall be used in conjunction with the established Diversity, Equity, and Inclusion Policy User Guide which provides further guidance on reporting requirements and EDA/city expectations.

1. Applicability and minimum project size

New construction, renovation or reconstruction projects receiving EDA/city financial assistance

This policy applies to development projects that receive $200,000 or more in financial assistance from the EDA/city and includes:

a) New construction, renovation, or reconstruction of commercial developments
b) New construction, renovation, or reconstruction of Industrial developments
c) New construction, renovation, or reconstruction of multi-family rental or for-sale housing developments
d) New construction, renovation, or reconstruction of mixed-use developments

The development must comply with the Diversity, Equity, and Inclusion Policy in effect at the time of the application date of planning and zoning applications and/or a signed preliminary development agreement. If building permits have not been issued within two years of application approvals or the building permits have expired or been canceled, the project must comply with updates to this policy. The EDA/city council may grant an extension of time beyond two years if a written request for a time extension is submitted to staff and approved by the economic development authority and/or city council. Requests for extension of time must be submitted to staff before the termination date.

2. Definitions

A) *Financial Assistance:* The Diversity, Equity & Inclusion Policy applies to all new and renovated commercial and multifamily residential buildings receiving EDA/city financial assistance.

Financial Assistance is defined as funds derived from EDA/city and includes, but is not limited to, the following:

1) Tax Increment Financing (TIF) and/or Tax Abatement
2) Land write-downs
3) EDA grants and loans
4) Affordable Housing Trust Fund (AHTF) grants and loans
5) Community Development Block Grant (CDBG) funds
6) Housing Rehabilitation funds
7) Revenue Bonds (private activity bonds are negotiable)
8) Housing Authority (HA) Funds
9) City of St. Louis Park funds

B) *Business Organization*: the developer's business organization, including subsidiaries and parent company.
C) *Business Enterprises*: the contractor(s) and sub-contractor(s) hired by or on behalf of the developer for the project.
D) *Workforce*: Employees of contractor(s) and sub-contractor(s) working on the Project
E) *Peripheral Enterprise(s)*: consultants and other businesses hired by the developer, or with whom the developer has a relationship, in conjunction with the project. This includes, but is not limited to, attorneys, financial consultants, financial institutions, suppliers, accountants, etc.
F) *Project*: The development project as defined in the development agreement between the EDA and the developer.

3. Diversity, Equity, and Inclusion participation goals

General requirements
A development that is subject to this policy shall comply with the following diversity, equity, and inclusion participation business and workforce participation goals:

Participation Goals	Women	BIPOC/AAPI
Business Organization	10%	13%
Business Enterprises	6%	13%
Workforce	20%	32%
Peripheral Enterprises	6%	13%

The developer will be required to use reasonable efforts to meet these business enterprise, workforce, and peripheral enterprise participation goals for women and Black, Indigenous and People of Color (BIPOC)/AAPI in conjunction with construction, renovation, or reconstruction of the development.

Participation goals will be applied to the developer's project as a whole and pertain to the total amount of construction and related contracts. Developer must provide and use reasonable efforts to cause its contractors/subcontractors to provide certain information and resources to prospective contractors/subcontractors before bidding; to implement procedures designed to notify women and BIPOC/AAPI about contracting opportunities; to document steps taken to comply with participation goals and the results of actions taken; and to provide compliance report(s). Refer to the Diversity, Equity, and Inclusion Policy User Guide for more information regarding performance and compliance.

4. Agreements

A development agreement shall be executed between the EDA and the developer, in a form approved by the EDA legal counsel, which formally sets forth development approval and requirements to achieve diversity, equity, and inclusion goals in accordance with this policy.

5. Reporting Requirements

The developer will be required to provide written reports to the EDA on a quarterly basis from the date the development agreement is entered into until six months after the project receives its certificate of occupancy from the city. The established Diversity, Equity, and Inclusion Policy User Guide provides further guidance on reporting requirements. At a minimum, the reports must include the following information:

1) Total number of construction-related business enterprises (e.g. general contractor, subcontractors) with
   a) percentage of women-owned enterprises
   b) percentage of BIPOC/AAPI-owned enterprises
   c) percentage of total development dollars paid to women-owned enterprises
   d) percentage of total development dollars paid to BIPOC/AAPI-owned enterprises

2) Total number of construction workforce employees with
   a) percentage of women construction workforce employees
   b) percentage of BIPOC/AAPI construction workforce employees
   c) percentage of total construction hours women construction workforce employees worked
   d) percentage of total construction hours BIPOC/AAPI construction workforce employees worked

3) List of peripheral enterprises with self-reported total number of employees, percentage of women and percentage of BIPOC/AAPI employees

4) Summary of efforts made to reach participation goals and ongoing efforts to reach and/or maintain participation goals

Executive summary

Title: Housing and Neighborhood-Oriented Development Systems Discussion Wrap-up

Recommended action: None

Policy consideration: The purpose of this report is to summarize the outcomes of the recent discussions within the housing and neighborhood-oriented development system study sessions.

Summary: From October 17 to December 12, 2022, the council had a series of discussions focused on advancing the city's strategic priority related to housing and neighborhood-oriented development. The council's discussions focused on public policy on several topics relating to providing a broad range of housing, business assistance, and neighborhood-oriented development. Staff also provided the council with written reports to provide information on current activities, programs, and policies. This report serves as a summary of all the discussions and includes the council direction provided.

Financial or budget considerations: Funds are budgeted in the 2023 housing and economic development budgets for a variety of programs related to supporting housing and neighborhood-oriented development. Should the council desire a change in work surrounding housing and neighborhood-oriented development, additional resources may be required.

Strategic priority consideration: St. Louis Park is committed to providing a broad range of housing and neighborhood oriented development.

Supporting documents: Discussion

Prepared by: Karen Barton, community development director
Approved by: Kim Keller, city manager

Discussion

Background: This system included study sessions covering a range of topics related to housing and neighborhood-oriented development. Topics were grouped and had self-contained outcomes based on various policy and practice questions. Reports on these topics were considered and discussed by the city council, and where appropriate, direction on future expectations and outcomes was provided to staff for implementation. A summary of the topics covered in this system includes:

Meeting subject: Housing and neighborhood-oriented development system introduction
Date: 10/12/2022

Overview: Staff introduced the system, including an overview of the housing and neighborhood-oriented development guiding documents. The proposed topics included in the system all centered on housing and neighborhood-oriented development policy and provided opportunities to consider how housing and neighborhood-oriented development is planned for, constructed, and maintained in the city. The topics examined current programs and offered opportunities, identified by both council and staff, for expansion or adjustment where applicable.

Outcomes: The council approved of the topics included in the system. Council members offered feedback and requested discussion around neighborhood commercial.

Meeting subject: 2023 housing budget overview
Date: 10/17/22

Overview: The 2023 housing budget overview was provided to the city council as a foundation for policy decisions throughout the housing and neighborhood-oriented development system discussion. The housing budget overview included the city's housing fund balances and information on the city's housing programs in the following categories: rental and ownership housing, social service contributions, rental assistance, miscellaneous housing expenses, and neighborhood grants. The report also provided an overview of the city's housing authority programs that utilize federal funding.

Outcomes: The overall housing budget has been discussed with council as part of the 2023 city-wide budgeting process. Council was supportive of the 2023 housing budget and fund balance information.

Meeting subject: Tax increment financing (TIF) management report and pooled TIF discussion
Date: 10/24/2022

Overview: Stacie Kvilvang from Ehlers, the city's financial consultant presented an overview of the annual TIF management report and discussed the EDA's continued use of pooled tax increment for qualified affordable housing uses. The report recommendations included:

- Return of increment to Hennepin County for redistribution from seven TIF districts;
- Transfer approximately $1.22 million from TIF districts with cash balances to the city's affordable housing trust fund for 2022;

- Modify the TIF plan budgets for two TIF districts to allow for an additional 10% to be retained for affordable housing;
- Develop a spending plan pursuant to recent legislation to allow the EDA to transfer approximately $1.76 million in unobligated TIF to a new account for use on construction of buildings.

Outcomes: The council was in favor of all recommendations contained in the report and the continued use of TIF to support the city's strategic priorities through various housing programs and new development. Additionally, the council provided direction to staff to:

- review the list of comparable cities prior to next year's report; and
- have a discussion with the school board on the impact of TIF

Meeting subject: City service and budget impacts from new development
Date: 10/24/2022

Overview: Information was provided in a written report relating to city service impacts of new development, including calls for service, infrastructure impacts, impacts to the school district, and benefits of new development.

Outcomes: Council concurred with staff's conclusion that while the number of calls for service and the actual costs to the city generated from these developments is difficult to estimate, there appears to be low financial costs to the city during the term of a TIF district. However, both the near-term and long-term beneficial impacts are numerous and significant. Continuing to develop in an efficient and mixed-use pattern is better for the city's financial health, the city's priority to be walking, biking, and transit-oriented, and community goals to make St. Louis Park a more inclusive place to live, work, learn, and play.

Meeting subject: Managing change in residential neighborhoods
Date: 11/7/2022

Overview: On September 12, 2022, the city council agreed to discuss the topic of managing change in residential neighborhoods. Council wanted to revisit the Vision 3.0 values, comprehensive plan goals and strategies, and strategic priorities that are closely related to the issue of managing change in existing single-family (low-density) residential neighborhoods.

In response, staff conducted a two-part study session to first facilitate a focused conversation among the council members to share reflections and insights on current policy guidance around this topic and to help broaden perspectives. Secondly to facilitate a workshop that led to consensus-based group decisions.

Outcomes: This activity provided staff with consensus council direction on managing change in low-density residential neighborhoods. It affirmed the strategic priorities and comprehensive plan goals, and prioritized efforts to support those priorities and goals, and answered the question:

How can our low-density neighborhoods become more aligned with our adopted strategic priorities?

- Engagement and Education
  - Neighborhoods create a work plan on how to align with goals
  - Educating the community on needs
  - Exposure to strategic priorities – do they know them?
  - Listen to school district
  - Equity in neighborhood leadership
  - Events to ease concerns
  - Gradual evolution
  - Eliminate language barriers to housing options
- Housing Types
  - Duplexes throughout
  - More townhomes
  - Larger family sized homes
  - Expand number of bedrooms in single-family homes
  - Multigenerational living
  - Rezone for duplex/triplex/quad homes at minimal expense
  - Rowhomes
  - Create more ADUs (accessory dwelling units)
  - More duplexes
  - Smaller lot sizes and smaller homes
  - Multigenerational housing
- Trees and Nature
  - Expand / preserve tree canopy
  - Increase tree canopy
  - Tree preservation (Legacy tree ordinance +)
  - Tree preservation incentives or regulation
  - Limit pesticide weed control
  - More yards with native plantings
- Culture
  - Art History Walkable
  - Cultural events like Wat Promwachirayan
  - Cultural-specific art
  - Bike land festivals
- Home Ownership
  - Affordable homes to buy
  - Entry-level ownership for BIPOC (Black, Indigenous, and People of Color) community
  - Limit investors to preserve ownership opportunities
  - More affordable home ownership opportunities
- Complete Neighborhoods
  - Retail gap analysis
  - 5- / 15-minute neighborhoods
  - More places to walk to
- $ (Financing)
  - NOAH preservation incentives

  - $ for incentives
  - Pilot programs
  - Create 30% AMI (area median income) options
  - Financial assistance for smart expansion
- Energy Efficient Homes

Staff will follow-up on the ideas and consensus direction from city council in a subsequent report noting what is currently being done, in process, included in work plans, or unable to be done.

Meeting subject: Corridor parking
Date: 11/7/2022

Overview: In response to a council requested study session topic related to parking regulations, council was provided with a written report that explored how changing the approach to parking could advance the city's strategic priorities and considered how those changes could impact the community. The city's strategic priorities and policies prioritize walkable, transit-focused, dense redevelopment. The city's current approach to parking and implementation through zoning code regulations for parking can often have the opposite effect, preventing proposals

that otherwise fit within the city's vision for vibrant, walkable, neighborhood-oriented development due to insufficient on-site parking.

Outcomes: Council supported staff's recommendations to allow existing commercial buildings in the C-1 zoning district to maintain their existing parking as-is, rather than require more spaces for more intense uses. This approach would help alleviate some of the barriers for small businesses and local storefronts, while still providing guidance for off-street parking minimums in the city. This allows for the use of on-street parking for businesses adjacent to residential neighborhoods.

This topic will be added to the planning commission's overall work plan and eventually lead to recommendations for ordinance amendments to the zoning code as it relates to parking standards, with the goal being to reduce minimum off-street parking requirements in areas where those requirements serve as significant barriers to investment and are not necessary to protect public health and safety or pedestrians, bicyclists, or motorists using the facility. Planning staff will work with other departments to ensure a holistic approach to reduce and avoid unintended consequences for public operation.

Meeting subject: Inclusionary housing policy discussion
Date: 11/14/2022

Overview: The inclusionary housing policy was adopted in June 2015 and is directly responsible for the creation of over 800 affordable rental units in St. Louis Park and is achieving the goal of creating affordable housing opportunities in the community. Staff regularly monitor the implementation of the policy and make appropriate recommendations to amend the policy as needed. As part of the housing and neighborhood development systems discussion, staff brought forth several proposed amendments to the policy for the city council's consideration.

Outcomes: The city council supported staff's recommended amendments to the inclusionary housing policy, including:

- Increasing the affordability period to 26 years to be consistent with the requirement for housing TIF districts;
- Placing a cap on the payment-in-lieu requirement for for-sale developments to be equal to the for-sale home purchase amount affordable to a household with an income at or below 80% area median income;
- Requiring that the master mortgage be taken into consideration in addition to the sale price of units in housing cooperatives when determining the payment-in-lieu;
- Adding language to the policy to make it clear that the requirement of the affordable units be managed and operated in compliance with rules and regulations outlined in the Inclusionary Housing Program Guide and apply to all of the affordable units; and
- Clarifying that if a parking stall is provided with the affordable unit in structured parking, the stall must be offered at a discounted rate.

Council did not support staff's recommendation to allow for administrative flexibility in determining the proportion of affordable bedroom mix in senior-only buildings, as proposed. Instead, language will be added to the policy that clarifies that an alternative mix for senior-only buildings may be considered with council approval.

Council also provided direction to staff to continue focusing efforts on 30% AMI units as this is the greatest need.

Staff will bring the amended Inclusionary Housing Policy to a future city council meeting for adoption. Upon approval of the amended Inclusionary Housing Policy the new requirements will become effective immediately for any future residential housing developments required to comply with the policy.

Meeting subject: Proposed zoning changes
Date: 11/14/2022

Overview: Throughout the year, zoning codes are reviewed in context of council priorities, 2040 comprehensive plan goals, and present considerations. In this context, changes are made toward the city's goal to provide for a livable community and a business-friendly climate.

City council was provided with a written report of several proposed zoning amendments that were in response to comments and requests made by residents and small business owners over the past year.

Outcomes: The city council was supportive of the proposed amendments, including:

- Allowing class 1 and 2 materials to be painted in all zoning districts;
- Allowing for temporary structures to be up for longer than 14 days per calendar year to balance the needs/desires of businesses and residential communities with respect to environmental stewardship;
- Exempting curbside pickup from the in-vehicle service definition to allow businesses to provide this service in all non-residential districts without obtaining a conditional use permit;
- Allow fences up to eight feet in height on residential properties when adjacent to non-residential properties in mixed use and planned unit development districts;
- Allow reasonable space in the front yard of a residential property for parking and driveway purposes when the parking cannot be accommodated in the rear and side yards; and
- Miscellaneous clarifications and minor amendments.

The proposed amendments listed above will be brought to the planning commission for review and discussion in 2022 and 2023. Subsequent ordinance changes will be made accordingly.

Meeting subject: Public art requirements for new development
Date: 11/14/2022

Overview: Council was provided with a written report with two main parts: 1) a description of public art in new developments, and 2) several public art updates. The first part described the mechanism that has generated much of the public art that has been installed in private developments in the city, as well as some details about the process we use to identify opportunities and select artists and artwork. The second part shared many updates about the

public art studies, partnerships, programs, and projects that have occurred as part of the strategic roadmap in which the city and St. Louis Park Friends of the Arts have collaborated.

Outcomes: The city council supported the process for including public art in new developments and the partnerships and activities to further advance public art installations in the city.

Meeting subject: Single-family rental density cap discussion
Date: 11/28/2022

Overview: The increase of investor ownership of single-family houses has become more prevalent, both nationally and in the Minneapolis-St. Paul metropolitan area since 2009. When the Great Recession forced many homeowners out of their homes in the early 2009/2010, investors picked up foreclosed single-family houses at low prices and converted them into rental properties. St. Louis Park also saw a significant increase in single family rentals during that time. Since 2010, the single-family rental market has continued to grow in some areas of the metro; however, the single-family rental market in St. Louis Park has remained relatively constant.

Council members expressed concern about the rise in corporate investor ownership in the metro area and requested a discussion to consider rental density caps as an option to promote equity, socioeconomic diversity, and racial integration, while providing opportunities for wealth building.

Outcomes: Council determined that there is not a significant concern with corporate investor ownership in St. Louis Park at this time. Council directed staff to continue to monitor and report back to city council if investor ownership of single-family houses increased over 10% from current levels. Specifically providing information about why the increase is occurring and the type of investor owners (I.e., corporate or small-scale). Staff will work to gather data from separate data bases to monitor the situation and better understand any potential issues. Staff will also continue to work with other agencies around this issue.

Meeting subject: Small business assistance programs
Date: 11/28/2022

Overview: Staff provided the city council with a written report providing an overview of the city's current small business assistance offerings and identifying potential future initiatives.

Outcomes: Council expressed support for the small business assistance, programs, and future initiatives. Staff will continue to evaluate existing programs and create new programs to support city businesses. Staff will bring forward more detailed program information about the proposed Advance commercial business assistance program for the EDA's consideration at a future meeting.

Meeting subject: Diversity, equity, and inclusion (DEI) policy for commercial developments
Date: 12/12/2022

Overview: Women and BIPOC/AAPI individuals and businesses have faced discrimination and disadvantages in employment and business opportunities which have resulted in significant disparities in wealth building opportunities. In response to these inequities and disparities, city staff created a Diversity, Equity, and Inclusion (DEI) policy to promote inclusive and equitable opportunities for women and BIPOC/AAPI individuals and businesses to provide opportunities to enable them to build wealth. The policy provides specific goals for the hiring of women and BIPOC/AAPI business organizations, business enterprises, workforce, and peripheral enterprises for all new and renovated commercial and multifamily residential buildings receiving EDA/city financial assistance.

Outcomes: The EDA/city council received a staff report on this policy in March 2022. Since that time the policy has been placed into effect for all new projects receiving $200,000 or more in financial assistance from the EDA or city funds. The policy has recently been reviewed by the city's race equity and inclusion director, who recommends some minor updates to language, specifically changing "non-white" to "BIPOC/AAPI." Staff also recommends increasing the workforce goals for women from 6% to 20% to better align with state and county goals for Hennepin County.

Staff requests the EDA/city council provide feedback on the policy during the December 12, 2022 study session, and determine whether it should be formally adopted.

Meeting subject: 2040 Comprehensive Plan implementation update
Date: 12/12/2022

Overview: The city is almost halfway between the drafting and adoption of the 2040 Comprehensive Plan and the start of the next comprehensive plan update, expected begin in 2026. Staff provided the city council with a written report that lists the activities and summarizes the progress the city has made on implementing the goals and strategies of the comprehensive plan as they relate to the housing and neighborhood-oriented development systems discussions.

Outcomes: The city council has been working through the housing and neighborhood-oriented development systems discussions for the last few months. Staff will use the input and direction from these discussions to help update the work plan for the planning commission over the next several years. This summary will also help as city staff prepare for the next round of comprehensive plan updates, with public engagement likely to start in 2025/2026.

Executive summary

Title: 2023 sustainability division programs and budget

Recommended action: No action required. This topic has been placed on the agenda to summarize the proposed budget for 2023 climate action programs.

Policy consideration: Does council support moving forward with the proposed 2023 sustainability division programs at the budget levels proposed?

Summary: Staff is proposing to continue some existing programs and launch new programs in 2023. Programs will be funded with the Climate Investment Fund (CIF) as long as they meet the adopted fund use policy; all remaining programs will be funded with the sustainability operating budget and with grant funds. When combined with existing policies and internal projects, these programs are projected to set the city on a path towards continuous and accelerated emissions reductions.

Financial or budget considerations: Staffing, communications, and general expenses will continue within the proposed 2023 sustainability operating budget. All participation incentives for sustainability programs are proposed to be funded from the Climate Investment Fund.

Total 2023 Climate Investment Fund budget: $183,000

Federal funds from the Inflation Reduction Act, Infrastructure Investment and Jobs Act, and congressionally directed spending will be leveraged whenever possible to reduce city expenses for incentives and projects, and staff will continue to pursue additional grant funds to further bring down city costs and to pay for disallowed public purpose expenditures such as compensation for community members' time and input.

Strategic priority consideration: St. Louis Park is committed to continue to lead in environmental stewardship.

Supporting documents: Discussion
Appendix A: Details of 2023 sustainability incentive programs
Appendix B: Other 2023 sustainability initiatives

Prepared by: Emily Ziring, sustainability manager
Reviewed by: Brian Hoffman, director of building and energy
Approved by: Kim Keller, city manager

Discussion

Background: As discussed at the November 2021 city council study session as part of the greenhouse gas emissions inventory and analysis review, the city's emissions are trending in the right direction due to both the city's efforts and to external policy efforts. While 2021 emissions data is not yet available, we know that more recent reductions were due in large part to the impacts of the COVID-19 pandemic and the city will need additional, aggressive climate action for these reductions to be sustained, particularly as the city population is projected to grow.

Staff is proposing to continue some existing programs and launch new programs in 2023. When combined with existing policies and internal projects, these programs are projected to set the city on a path towards continuous and accelerated emissions reductions.

A summary of the proposed slate of 2023 CIF programs and budget is below, and Appendix A contains more specifics on each program. As the sustainability division is also involved in public education, advocacy and policy administration, Appendix B addresses sustainability initiatives under development or consideration and funded outside of the CIF. A more detailed discussion of all of these programs, including past communications and engagement efforts and future plans, can take place at the request of council when the Environmental Stewardship system returns in 2023.

Present considerations:

Climate Investment Fund budget summary

Program	Description	2023 budget
Climate Champions for business	Continuation of cost share program for properties that take action to improve energy efficiency, including lighting retrofits, HVAC and equipment replacement. Energy improvements will reduce utility bills and can improve aesthetics and security. Water efficiency measures added.	$ 15,000
Climate Champions for multifamily	Cost share program for multifamily properties that take action to improve energy efficiency, including lighting retrofits, HVAC and equipment replacement. Energy improvements will reduce utility bills and can improve aesthetics and security. Water efficiency measures added.	$ 25,000
Climate Champions for organizations	Cost share program for nonprofits that take action to improve energy efficiency, including lighting retrofits, HVAC and equipment replacement. Energy improvements will reduce utility bills and can improve aesthetics and security. Water efficiency measures added.	$ 20,000

Climate Champions for homes	Cost share program for 1-4 unit homes that take action to improve energy efficiency, including lighting retrofits, HVAC and equipment replacement, and fuel switching. Energy improvements will reduce utility bills and can improve aesthetics and security. Combined HES plus energy efficient rebates.	$ 32,000
Climate Champions solar bonus	Offer a 10-15% cost share on rooftop solar for any building that completes an energy audit, reduces GHGs by a threshold percentage, and wants to install solar.	$ 25,000
Building Operations Champions	Offers cost share for commercial property owners who pay for their building operators to attend Building Operator Certification (BOC) level 1 or multifamily training and pass the exam.	$ 3,000
Tree planting programs: full-service planting and Shade SLP	Carbon biosequestration--tree planting to capture and store carbon dioxide, enhancing property values and aesthetics and reducing owners' utility costs through increased shading and reduced flooding.	$ 30,000
Depaving pilot	Offers cost share for commercial property owners to turn unused parking spaces into green space.	$ 25,000
Electrify Everything	Home electrification website development and community engagement initiative, with fuel switching cost share incentives for 1-4 unit homes.	See Climate Champions for homes
Multifamily EV charging	Offer an incentive for multifamily rental buildings to install EV chargers. Build off Xcel multifamily EV charging program.	$ 8,000
TOTAL		**$ 183,000**

Next steps: Staff will design and communicate these programs and projects for 2023 implementation.

Appendix A: Details of 2023 sustainability incentive programs

* Indicates new program

Community-facing incentive programs

Program name: Climate Champions (with solar bonus)*

CAP goal(s): 1, 2 and 4

Description: Energy assessment, cost share, and recognition program for property owners who elect to participate; solar bonus incentive for those who first reach energy efficiency targets

Sectors: Business (current), multifamily (new), organizations (new), and homes (new; combines Home Energy Squad with Energy Efficient rebate match program and increases and expands rebates)

Equity component: Larger cost share amounts for properties in environmental justice areas of concern

Risks: Success depends on appetite of property owners (including landlords) to invest time and money in energy efficiency

CAP strategies' annual target: 20 commercial buildings retrofit; 900 single-family households complete retrofits/weatherization; 1,782 households replace electrical equipment and 720 households replace natural gas equipment with high efficiency

2022 results: 29 businesses received energy assessments, and 4 completed energy projects, collectively saving $15,000 and 71 tons of GHG emissions annually; 136 households replaced electrical equipment and 49 households replaced natural gas equipment with high efficiency

Proposed budget: $15,000 for businesses; $25,000 for multifamily; $20,000 for organizations; $32,000 for homes; plus $25,000 for solar incentives for all property types: $117,000 TOTAL (source: Climate Investment Fund)

Federal funds impact: Inflation Reduction Act provisions, including tax credits and direct-to-consumer rebates, can offset some city incentives, e.g.

- Home Owner Managing Energy Savings (HOMES) Program (§50121)
- High-Efficiency Electric Home Rebate program (§50122)

Cannot be combined

- Residential Energy Efficiency Tax Credit (§13301)
- Residential Clean Energy Tax Credit (§13302)
- Energy efficient commercial buildings deduction (§13303)

Utility rebates for electrification are also in the process of being designed. Because all of these rebate programs will not be effective until late 2024, city incentives will likely decrease proportionately once the rebates are available.

Program name: Building Operations Champions

CAP goal(s): 1 and 2

Description: Cost share for commercial property owners who pay for their building operators to attend Building Operator Certification (BOC) level 1 or multifamily training and pass the certification exam. The cost share and utility rebates bring down the cost from $1,200 to $50-100.

Sectors: Commercial & industrial, multifamily

Equity component: Larger cost share amounts for trainees from traditionally underrepresented groups

Risks: Success depends on appetite of commercial property owners to invest time and money in training, and availability of facilities maintenance workforce

CAP strategies' annual target: 38 commercial buildings engaged in building operations BMPs

2022 results: None

Proposed budget: $3,000 (Source: Climate Investment Fund)

Federal funds impact: N/A

Program name: Shade SLP and full-service tree planting (in coordination with Parks & Recreation)

CAP goal(s): Advanced strategies

Description: Tree planting to capture and store carbon dioxide, enhancing property values and aesthetics and reducing owners' utility costs through increased shading and reduced flooding

Sectors: All

Equity component: Larger cost share amounts for properties located where high surface temps and low tree canopy overlap

Risks: Success depends on property owners desire for additional trees and investment in tree maintenance

CAP strategies' annual target: N/A (no targets listed for Advanced Strategies); staff set goal of additional 300 trees, doubling the annual number planted on private property

2022 results: 95 trees planted on private property, with orders for more trees in 2023

Proposed budget: $30,000 (source: Climate Investment Fund)

Federal funds impact: Inflation Reduction Act provision:

- Urban and Community Forestry Assistance Program (§23003), competitive grants for tree planting projects that prioritize underserved populations and areas. Solicitation in mid-2023. Grant awards will be made directly to community-based organizations (CBOs), so if areas of St. Louis Park meet the low-income criteria (which has not yet been defined), staff will likely partner with a CBO for these funds.

Program name: Electrify Everything*

CAP goal(s): Advanced strategies

Description: This project will be jointly administered by a cohort of metro-area cities (Minneapolis, St. Louis Park, Edina and Eden Prairie). It has two components:

- *Electrify Everything* website: cities will work with a consultant to build a website which will educate the public about electrification readiness and technologies, as well as provide a list of trained contractors for each type of technology. Cities will also partner on outreach and engagement strategies to drive residents to the website. Residents who decide to weatherize, electrify their heating/cooling or water heating will be directed to the Climate Champions for homes program to explore cost share incentives.
- The three suburban communities (St. Louis Park, Edina and Eden Prairie) are expected to receive congressionally-directed spending in 2023 for a whole-home electrification pilot. The project will consist of whole home weatherization and electrification retrofits of 5-10 existing income-qualified homes across the three cities. The goals include increasing local contractor knowledge and experience in putting the pieces together and understanding the sequencing needed for comprehensive retrofits for energy efficiency in different building types and vintages of homes across the cities. The program will leverage Center for Energy and Environment's home energy career trainings, which target training and paid internships to individuals from BIPOC communities and women, bringing real-world practice to grow new expertise among underserved communities. The *Electrify Everything* website will have a page that serves as a recruitment hub for interested property owners.

Sectors: Multifamily, 1-4 unit residential

Equity component: Grant funds income-qualified homes only

Risks: Success depends on multiple external factors, such as property owner comfort with technology, cost of electricity, appetite of property owners to invest time and money in fuel switching, contractor familiarity with technology, availability of equipment

CAP strategies' annual target: N/A (no targets listed for Advanced Strategies)

Proposed budget:

- Approximately $15,000 will be used for the development of the *Electrify Everything* website (source: sustainability division operating funds)
- $32,000 for Climate Champions for homes, which will include electrification technology rebates (source: Climate Investment Fund)
- St. Louis Park's share of $1 million congressionally-directed spending award will fund education and outreach, contractor training and vetting, project management, design and construction (source: Senate appropriations committee/federal budget)
- A percent match requirement for the congressionally-directed spending award is still unknown

Federal funds impact: Inflation Reduction Act provisions, including tax credits and direct-to-consumer rebates, can offset some city incentives, e.g.

- Home Owner Managing Energy Savings (HOMES) Program (§50121)
- High-Efficiency Electric Home Rebate program (§50122)

Cannot be combined

- Residential Energy Efficiency Tax Credit (§13301)
- Energy efficient commercial buildings deduction (§13303)

In addition to IRA rebates, utilities are also in the process of designing rebates for electrification. Because all of these rebate programs will not be effective until late 2024, city incentives will likely decrease once the rebates are available.

Additionally, the U.S. Department of Energy's Office of State and Community Energy Programs (SCEP) will have a dedicated team and funding for community engagement and technical assistance, who may be able to assist with community outreach and education.

Program name: EV charging incentives for multifamily buildings*

CAP goal(s): 6

Description: Cost share funds for multifamily property owners to incentivize installation of electric vehicle (EV) charging stations in private parking lots with shared (non-dedicated) spots. Acceptance into the Xcel Energy Multifamily Charging Program will be required for the cost share. Under this program, Xcel Energy installs and maintains all electric vehicle charging infrastructure (i.e., transformers, conduit) at no charge to the property owner. The city program would offset the remaining cost (the electric vehicle charging unit or lease fee).

Sectors: Multifamily

Equity component: Funds only available for properties where residents have "first come, first served" private parking, i.e., naturally-occurring affordable housing

Risks: Success depends on property managers' or landlords' willingness to install charging stations

CAP strategies target: Goal 6 is to reduce vehicle emissions by 25% by 2030 as compared to the business-as-usual forecast. A key strategy to achieving this goal is to increase adoption of electric vehicles such that EVs comprise 28% of total car ownership and 1% of all truck ownership in St. Louis Park (annual targets are not available given data limitations). An additional initiative under this strategy is to expand private EV charging infrastructure and encourage private businesses to offer charging stations for EVs.

Proposed budget: $8,000 (source: Climate Investment Fund)

Federal funds impact:

Inflation Reduction Act provision:

- Tax credit for alternative refueling property (§13404), for electric vehicle charging and alternative fuel infrastructure installed in low-income or rural census tracts. If areas of St. Louis Park meet the low-income criteria (which has not yet been defined), staff will promote the tax credit when promoting the city program in those areas.

Infrastructure Investment and Jobs Act provision:

- Surface Transportation Block Grant Program provides flexible funding to best address state and local transportation needs, including installation of EV charging infrastructure and vehicle-to-grid infrastructure. Staff will review this opportunity for eligibility.

Program name: Depaving cost share pilot (in coordination with Engineering, Community Development, and Parks & Recreation)*

CAP goal(s): Advanced strategies

Description: Offers cost share for commercial property owners to turn unused parking spaces into green space, lowering surface temperatures, improving air quality and reducing stormwater runoff

Sectors: Commercial & industrial, multifamily

Equity component: Larger cost share for areas experiencing higher surface temperatures (urban heat island)

Risks: Success depends on property owners' willingness to demolish parking spaces

CAP strategies' annual target: N/A (no targets listed for Advanced Strategies)

Proposed budget: $25,000 (source: Climate Investment Fund)

Federal funds impact: N/A

Appendix B: Other 2023 sustainability initiatives

Other sustainability projects, programs and policies under development or consideration

- Idling reduction fleet policy and *Idle-Free SLP* public educational campaign
- Efficient Building Benchmarking ordinance administration
- Climate equity map and Environmental Stewardship dashboard
- EV Charging Master Plan (in coordination with external partners)
- Sustainability-themed Spring Art Walk (in coordination with Friends of the Arts and the environment and sustainability commission)
- Energy assistance programs (promoting, coordinating providers and advocating for improvements)
- Various work groups and coalitions, including:
    - Midcontinent Independent System Operator (MISO) Cities and Communities Coalition
    - Hennepin County EV and tree policy work groups
    - MnDOT Local Agency Vehicle Miles Traveled work group

These projects, programs and policies are not incentive-based and therefore not funded from the CIF.

Staff routinely seeks out grant funding opportunities from partners at the federal and state level and from foundations and will add additional programs or projects to the work plan or supplement funding for planned programs as opportunities arise. For example:

- Within the Infrastructure Investment and Jobs Act (IIJA), the Department of Energy's Energy Efficiency and Conservation Block Grant (EECBG) Program is expected to launch in late 2022 and the city will likely be eligible to receive formula funds of approximately $120,000. These funds may be used for a wide range of energy efficiency projects or potentially as match for other federal funding opportunities.
- Also in the IIJA, Charging and Fueling Infrastructure Grants will provide $2.5 billion in competitive grants to public sector entities to support the installation of publicly accessible charging infrastructure. IIJA requires at least 50% of these funds to be designated for a community grant program prioritizing rural and low- and moderate-income communities with a low ratio of private parking spaces. City staff have already identified areas of St. Louis Park that have limited parking and are near multifamily housing as candidates for additional public chargers. Staff will follow this funding opportunity closely as more information becomes available.
- Within the IRA, the Clean Electricity Investment Tax Credit has been extended and modified so that non-tax-paying entities may receive (via "direct pay") the financial benefit of the tax credits if they meet requirements for domestically produced construction materials. Staff will work to ensure these funds are received for the solar installations at The Rec Center and Fire Station 1. There is also a possibility that the funds can be used to complement a solar array with battery storage, allowing the city to pilot test this technology in an effort to boost climate resilience.

Sustainability staff has provided the relevant departments with information about provisions within the IRA and IIJA which may provide financial benefits to internal projects within their areas and will continue to monitor opportunities closely to determine how to maximize public dollars.

Executive summary

Title: 2040 comprehensive plan implementation update

Recommended action: No action is required at this time. Please review the report and provide comments or questions to city staff.

Policy consideration: How has the city progressed over the last five years to implement the housing and neighborhood-oriented development goals and strategies of the 2040 comprehensive plan? What goals and strategies should be prioritized over the next five years for implementation?

Summary: The city is almost halfway between the drafting and adoption of the 2040 Comprehensive Plan and the start of the next comprehensive plan update, expected in 2026. This report serves as a list of activities and summary of the progress the city has made on implementing the goals and strategies of the comprehensive plan as they relate to community development, and as part of the housing and neighborhood-oriented development systems discussions.

Attached to this document is a table of all the goals and strategies listed within Chapter 5: Livable Communities of the 2040 Comprehensive Plan, planning and zoning studies listed in Chapter 8: Implementation, and a progress summary.

Financial or budget considerations: None at this time.

Strategic priority consideration: St. Louis Park is committed to providing a broad range of housing and neighborhood oriented development.

Supporting documents: Discussion, Table of Chapter 5 Livable Communities goals and strategies, Planning and zoning studies list from Chapter 8: Implementation

Prepared by: Laura Chamberlain, senior planner
Reviewed by: Sean Walther, planning manager/deputy CD director
Karen Barton, community development director
Approved by: Cindy Walsh, deputy city manager

Discussion

Background

The city comprehensive plan is an official document that guides the future of the City of St. Louis Park. It sets forth policies and programs that govern land use, transportation, public facilities, economic development, housing and other areas of city government. The comprehensive plan is required by state statute to be updated at least every ten years to comply with regional plans of the metropolitan council. The city is almost halfway between the writing of the current plan, and the start of the next update. This report serves as a summary of the progress the city has made on implementing the goals and strategies of the comprehensive plan.

The city council adopted the 2040 Comprehensive Plan on August 5, 2019. This was after over two years of engagement with the community and collaboration between city staff, planning consultants, the planning commission, and city council. The foundation of the comprehensive plan was established around the city's Vision 3.0, which culminated in the five strategic priorities of the city in 2017.

The 2040 Comprehensive Plan set the goals and strategies for the various roles and responsibilities for the City of St. Louis Park through the year 2040. The plan's fifth chapter, Livable Communities, makes up the various topics covered by the Community Development Department. These include:

- Land Use
- Economic development and redevelopment
- Housing
- Public art
- Historic resources
- Plan by neighborhood

For each subsection of Chapter 5: Livable Communities, above, the plan identified goals and strategies to implement those goals. Chapter 8: Implementation of the comprehensive plan mainly includes the tools used to implement goals, policies and strategies, but also included specific lists of planning and zoning studies to be conducted.

Present Considerations

Attached to this document is a table of all the goals and strategies listed within Chapter 5: Livable Communities of the 2040 Comprehensive Plan, planning and zoning studies listed in Chapter 8: Implementation, and a progress summary.

For this summary, staff have categorized implementation into several categories:

- On-going implementation – these items involve existing policies, programs, or practices that are continually implemented by city staff through everyday work.
- Specific policies and programs that have been implemented or adopted
- Specific policies and programs that are on the planning commission work plan to be implemented or adopted over the next couple of years
- Not yet implemented – these items may need to be assessed for priority as the planning commission establishes their work plan over the next couple of years

The purpose of this summary is to see how actions over the last five years have been guided by the 2040 Comprehensive Plan, and to identify those areas that still need to be implemented.

Next steps

The city council has been working through the housing and neighborhood-oriented development systems discussions for the last few months. Going forward, staff will use the input and direction from these discussions to help update the work plan for the planning commission over the next several years. This summary will also help as city staff prepare for the next round of comprehensive plan updates, with drafting likely to start in 2025.

Livable Communities Goals and Strategies

Goal 1.	**Provide attractive public streets, spaces and facilities that contribute to creating connections, a strong sense of community, and opportunities for community interaction.**
Strategy	**Actions**
A. **Establish unique and cohesive street character for major community streets, emphasizing safe and comfortable pedestrian and bike connections, landscaping, lighting, and seating areas for the use**	• We invested in Historic Walker Lake area to improve ADA accessibility, sidewalks, bikeways, parking, streets, wayfinding and branding implementing key elements of the Historic Walker Lake plan. • We created unique designs, landscaping, and public art into Louisiana Avenue Minnehaha Creek bridge, and before that the Highway 7 and Louisiana Avenue interchange building upon the Louisiana Avenue LRT Station Area Plan. • We reduced 36th Street from 4 to 3 lanes and added a cycle track to the south, adding to previous pedestrian, lighting, landscaping seating, bike racks, and multiple art installations along this corridor that is supported by a special services district. • We improved safety for all users to cross Highway 7 at Wooddale Avenue to connect to the LRT station with a new interchange, signal systems, bike lanes, and a regional trail tunnel. • We transformed Beltline Boulevard and Monterey Avenue between CSAH 25 and Excelsior Boulevard with a road diet, bike lanes, trails, crossing improvements, a roundabout and regional trail bridge over Beltline to improve safety for all users. • The city has installed new sidewalks with poetry engravings, bike lanes, seating and landscaping on Texas Avenue helping connect the community to transit stops and the Texa-Tonka and Knollwood areas. Private owners and developments have helped to improve the sidewalks and adjacent land uses in the Texa-Tonka area along Minnetonka Boulevard.

	• The city continues to work with Hennepin County to similarly improve Minnetonka Boulevard both at Texas Avenue and east of Highway 100. • Cedar Lake Road has been improved bike facilities and a roundabout. More improvements are planned for the intersection with Louisiana Avenue, and Louisiana Avenue north to I-394 • Preceding the comprehensive plan the city transformed Park Place Boulevard and Excelsior Boulevard and both are supported with special services districts to help maintain the lighting, landscaping, banners, irrigation and other services for these community streets.
B. **Create well-defined community gateways at appropriate points where major streets cross the city's municipal boundary, using location appropriate signage, public art, public plazas, and architecturally significant buildings.**	• These were previously addressed with city-entrance monument signs and landscaping at it borders. The West End area reflects these efforts. The city is working to make each of the LRT stations areas reflect this as well.
C. **Incorporate "complete streets" design principles into future improvements of the community's streets to implement planned multi-modal transportation networks and to help achieve the city's goals to reduce vehicle emissions and provide a more equitable system of transportation options.**	• Monterey Drive Multimodal Study (2018) • See the list of responses in A above for examples
D. **Provide pedestrian and bicycle pathways that connect key departure points and destinations throughout the city and require installation of identified connections during the redevelopment process.**	• These were discussed in depth during the connected infrastructure system study sessions earlier this year. Some of the city's activities are described in responses to A above.
E. **Promote high quality design of public and private open spaces that will benefit anticipated users with proper consideration given to use, design, maintenance, appearance, location, and accessibility of the space.**	• Continued inclusion of designed outdoor recreation area in new development, including in some developments the publicly visible and accessible spaces such as the green in front of Bridgewater HQ, the urban forest at Via Sol, and the planned plaza at OlyHi next to Wooddale Avenue station.

F. **Encourage placement of artwork and amenities throughout the city to help increase civic prominence and a unique sense of place where appropriate.**	• Arts and culture strategic framework focus group (2019) • The ongoing programs and the projects and initiatives highlighted in the public art update provided to city council last month.

G. **Continue to use appropriate outdoor lighting for illumination of streets, parking lots, and other public and private areas.**	• On-going implementation:
	  ○ Street design including pedestrian-scale lighting as well as vehicle-scale lighting
	  ○ Stricter exterior lighting standards for parking lots were adopted in 2019 to meet public safety goals as well as reduce light pollution and conserve energy.

H. **Incorporate "living streets" design principles into future improvements of the community's streets in order to enhance the corridors' appearance and environment.**	• City Council adopted the living street policy in August 2019.
	• Recent street improvements that have incorporated "living streets" design principles:
	  ○ 36th Street West improvements
	  ○ Beltline Boulevard and Monterey Drive improvements
	  ○ Historic Walker Lake street improvements
	  ○ Louisiana Avenue South improvements

I. **Continue to reduce the level of obtrusive signage within the city by promoting a balance between aesthetics, safety, and communication needs.**	• Miscellaneous Text Amendments (2016)
	  ○ Sign code amended to increase the size maximum allowed for signs in the R-4 Multiple-Family Residence district and the R-C High-Density Multiple-Family Residence district.
	  ○ Sign code amended to decrease the minimum setback required for signs at schools, community centers, libraries, religious institutions, and other similar uses.
	• Sign code amended to allow rooftop signs in narrow circumstances (2021)
	• Sign code amended to increase the maximum sign face area allowed for electronic signs for large properties in the park and open space district and residential districts (2022)

J. **Work with internal and external partners to ensure that roadway and pedestrian facilities, including bridges, located in the city are functional and aesthetically attractive.**	• Louisiana Avenue bridge update over Minnehaha Creek and *Perennial Flow* art installation (2022)
K. **Continue to achieve high quality design standards for the exterior appearance of public structures.**	• No specific implementation of this other than meeting zoning architectural design standards
L. **Establish a timetable and implementation strategies to bury utilities. Continue to require the undergrounding of utilities in all new developments and redevelopment projects.**	• Development review requires buried utilities as part of the review process

Goal 2.	**Promote building and site design that creates a connected, human scale, multi-modal, and safe environment for people who live and work here.**
Strategy	**Action**
A. **Encourage quality design in new construction such as building orientation, scale, massing, and pedestrian access.**	• MX-1 and MX-2 districts have specific standards for building orientation, scale, massing, and pedestrian access • The city will consider massing and bulk standards as part of the zoning code update, scheduled in 2023-2024
B. **Encourage new buildings to orient to walkable streets with appropriate building height to street width ratios.**	• Ground floor transparency ordinance (2019)
C. **Revisit the city's architectural control ordinance ensuring that it provides clear direction to developers and enhances the visual quality and livability of the city.**	• Architectural design ordinance (2020) • The city will consider updates to architectural standards as part of the zoning code update, scheduled in 2023-2024

D. **Require parking lots to be separated from sidewalks and roadway facilities with appropriate landscaping, street walls or berms, and curbs.**	• This is an on-going policy that the city implements through site plan review for proposals
E. **Continue to enforce parking lot standards that address surfacing, light standards, tree canopy, and heat island reduction.**	• This is an on-going policy that the city implements through site plan review for proposals • The city will consider updates to tree preservation and planting standards as part of conversations with the Natural Resources department, expected in 2023
F. **Incorporate Crime Prevention through Environmental Design (CPTED) principles and practices into building and site design to maximize visibility and eyes on the street.**	• Ground-floor transparency ordinance • On-going implementation of lighting standards

Residential Land Use Goals and Strategies

Goal 1.	**Create a mix of residential land use and housing types to increase housing choices, including affordable housing, and increase the viability of neighborhood services through redevelopment or infill development.**
Strategy	**Action**
A. **Engage the community to determine how to allow a broader range of housing types and densities within and adjacent to existing low density residential neighborhoods that are complementary and compatible with the existing neighborhood character.**	• The city will consider expanding housing types allowed in low density residential areas as part of the zoning code update, scheduled in 2023-2024
B. **Promote and support the development of medium and high density residential land uses near commercial centers and nodes.**	• Rezoning of properties to MX-1, MX-2 • The city will consider establishing a TOD zoning district, scheduled in 2023-2024
C. **Ensure that new and redeveloped medium and high density residential land uses are located within walking distance of transit and commercial services.**	• Off-street parking requirements (2021) – transit reduction language added and refined

D. **Engage the community to explore how to increase the mix of housing types near transit corridors, parks and commercial nodes/corridors.**	• The city will consider expanding housing types allowed in all residential areas as part of the zoning code update, scheduled in 2023-2024 • The city will consider establishing a TOD zoning district, scheduled in 2023-2024

Goal 2.	**Preserve and enhance the livability and unique character of each neighborhood's residential areas.**
Strategy	**Action**
A. **Promote maintenance and reinvestment of existing residential land uses that have experienced deferred maintenance, deteriorating property values, high vacancy rates, or reuse opportunities.**	• On-going implementation of single- and multi-family housing improvement loan programs and housing maintenance programs
B. **Require the creation of appropriate and effective buffer or transition areas between different land use types.**	• On-going implementation of land use map, zoning districts, and screening standards

Commercial & Office Land Use Goals and Strategies

Goal 1.	**Preserve and enhance community commercial centers that offer desirable and complementary commercial retail and services for the community's residents, workers, and visitors.**
Strategy	**Action**
A. **Minimize the adverse impacts associated with large community commercial centers using design, performance standards, site planning techniques, minimizing surface parking, buffering, and traffic management.**	• Ground floor transparency ordinance (2019)
B. **Ensure that community commercial centers contribute to an aesthetically positive identity for the community.**	• Architectural design standards

C. **Integrate community travel routes within commercial centers in order to improve overall multi-modal safety, access and circulation around and through the centers.**	• On-going implementation of multi-modal transportation analysis during development review
D. **Encourage infill development and aesthetic improvements to commercial surface parking lots in order to enhance adjacent public streets and sidewalks and more efficiently utilize commercial land.**	• Establishment of MX-1 and MX-2 zoning districts • The city will consider a corridor parking policy for neighborhood commercial uses, expected in 2023
E. **Promote the inclusion of office employment uses within or adjacent to large commercial developments to strengthen the functionality and vitality of community commercial centers.**	• Rezoning of numerous properties from commercial to office, especially along Wayzata Boulevard

Goal 2.	**Create commercial corridors that are functional, vibrant, environmentally sustainable, and present an aesthetically positive identity for the community.**
Strategy	**Action**
A. **Minimize the adverse impacts associated with commercial corridor development using design, performance standards, site planning techniques, and buffering.**	• On-Going Implementation of zoning standards and development review
B. **Enhance commercial corridors' compatibility with nearby residential areas.**	• Rezoning C-2 General Commercial properties to C-1 Neighborhood Commercial (2019) • MX-1 Zoning District (2019)

Goal 3.	**Preserve, revitalize and foster neighborhood commercial nodes that provide essential neighborhood commercial services, unique neighborhood identity, and neighborhood gathering opportunities.**
Strategy	**Action**

A. **Encourage infill and redevelopment in neighborhood commercial nodes that is neighborhood scale in building size, architecture, and orientation to the street.**	• C-1 retail and service site requirements (2019) • Rezoning C-2 General Commercial properties to C-1 Neighborhood Commercial (2019) • Historic Walker Lake and Texa Tonka small area plans
B. **Implement convenient pedestrian access to and within the neighborhood commercial nodes from adjacent neighborhoods and transit stops.**	• On-going implementation of Connect the Park • Recent improvements to 36th Street and Wooddale Avenue • Upcoming improvement to Cedar Lake Road and Louisiana Avenue • Partner with Hennepin County on Minnetonka Boulevard improvements
C. **Re-guide or rezone targeted commercial nodes in order to require a mix of commercial and employment or residential uses when they redevelop.**	• MX-1 Zoning District (2019) • MX-2 Zoning District (2020)
D. **Consider rezoning certain commercial areas or small commercial sites that abut residential properties from General Commercial to Neighborhood Commercial to reduce the potential size and intensity of future buildings and commercial uses.**	• Rezoning C-2 General Commercial properties to C-1 Neighborhood Commercial (2019)
E. **Re-guide under-performing commercial nodes to medium or high density residential to encourage redevelopment.**	• Sam's Club land use and development study (2019)
F. **Prepare small area plans for commercial nodes and corridors where the appropriate future land uses are unclear, where significant changes are anticipated, and where additional guidance is needed.**	• Texa-Tonka small area plan (2019) • Historic Walker Lake plan (2019 • Sam's Club land use and development study (2019)

Goal 4.	**Preserve and enhance office/medical centers to retain and grow the community's employment opportunities, tax base, and convenient access to desirable services.**
Strategy	**Action**
A. **Support expansion of existing medical centers and supportive uses.**	• On-going implementation of land use plan and zoning districts

B. **Support new and expanded office development.**	• Rezoning of numerous properties from commercial (C-2) to office (O)
C. **Re-guide or rezone targeted commercial corridors from general commercial to office in order to promote redevelopment.**	• Sam's Club land use and development study (2019)
D. **Integrate community travel routes within office and medical centers in order to improve overall multi-modal safety, access and circulation around and through the centers.**	• On-going implementation of multi-modal transportation analysis during development review

Mixed-Use Goals and Strategies

Goal 1. Continue to enhance the Park Commons area as St. Louis Park's "town center."	
Strategy	**Action**
A. **Promote and support the redevelopment of the remaining designated redevelopment sites in the Park Commons area with mixed-use buildings to strengthen the area's function as the "town center."**	• 4800 Excelsior / Fresh Thyme • Bridgewater Bank Headquarters
B. **Ensure that future redevelopment provides similar building forms and densities that will complement the character of the "town center."**	• 4800 Excelsior / Fresh Thyme • Bridgewater Bank Headquarters • On-going implementation
C. **Require that future redevelopment is designed with buildings that are oriented to the public streets and spaces that are the heart of the "town center."**	• On-going implementation
D. **Encourage integrating community travel routes within the area in order to improve overall multi- modal safety, access and circulation around and through the area.**	• On-going implementation
E. **Engage the community to update the Park Commons West Master Plan and implementation strategies.**	• No progress

Goal 2.	Pursue redevelopment of future light rail transit station areas as transit-oriented, high density, well-connected, mixed-use centers.
Strategy	**Action**
A. **Promote and support the Wooddale Station Area as a transit-oriented mixed-use neighborhood.**	• Rezoning of EDA & Standal parcels to MX-1 (2019) – later rezoned to PUD for OlyHi development (2022)
B. **Promote and support the Beltline Station Area and Louisiana Station Area as primarily transit-oriented, mixed-use employment centers.**	• Rezoned parcels to Business Park, and some to mixed-use in 2019-2020
C. **Require transit-oriented development on properties near future light rail transit stations consistent with station area framework plans.**	• Beltline Station Development, OlyHi, Risor, Corsa planned unit development examples (2021-2022) • Ongoing
D. **Consider adopting form-based codes or similar zoning amendments to help implement station area framework plans.**	• On planning commission work plan (2023-2024)

Goal 3.	Expand the development of mixed-use districts within St. Louis Park to create a more livable and connected community.
Strategy	**Action**
A. **Encourage and support mixed-use infill and redevelopment when compatible with existing or surrounding planned land uses.**	• Ongoing implementation (see development dashboard for many examples)
B. **Expand the distribution of mixed-use redevelopment in neighborhood commercial nodes and along commercial corridors to the broader community.**	• Rezoning of parcels throughout the community to C-1 and MX-1, both of which allow for a mix of uses (2019) • Creation of MX-2 district and rezoning of parcels in Historic Walker Lake to MX-2 (2020)

C. **Promote and support reinvestment in the Historic Walker Lake area as a mixed commercial/industrial district that is compatible with its unique character and scale.**	• Historic Walker Lake Revitalization Plan (2019) • Historic Walker Lake parking ordinance (2019) • Creation of MX-2 mixed-use zoning district (2020)
D. **Complete a small area plan for the Historic Walker Lake area.**	• Historic Walker Lake Plan (2019)
E. **Promote and support mixed-use redevelopment in The West End to strengthen its role as a unique and dynamic place to live, work, shop, and play in the metropolitan area.**	• Elan West End (2019), 10 West End (2020), Caraway (2023) openings • Shops at West End PUD amendment to allow more uses and flexibility (2021) • Metro Transit Route 9 expanded service • Gamble Drive open streets special events plan (2018)

Industrial & Business Park Land Use Goals and Strategies

Goal 1.	**Protect and enhance the viability of the city's designated industrial and employment areas through reinvestment in long-term industrial areas, and adaptive reuse and eventual redevelopment in transitional industrial areas.**
Strategy	**Action**
A. Protect planned industrial areas from encroachment by non-industrial and incompatible uses.	• On-going implementation through established land use guidance and associated zoning districts for industrial uses
B. Encourage and support the appropriate evolution and expansion of individual industrial businesses.	• On-going implementation • Approved CUP for Nordic Ware expansion (2020)
C. Support new industrial land uses that are able to minimize negative environmental impacts and nuisances to surrounding land uses.	• On-going implementation
D. Promote and support the transition and eventual redevelopment of physically and economically obsolete or underutilized industrial properties.	• Amendments made to industrial district regulations • Some properties were rezoned from industrial to business park to transition them to higher-level employment or mixed-use to allow active commercial ground floor use and either office or residential upper levels.

E. Consider creating a Transitional Industrial zoning district and rezoning suitable redevelopment properties to Transitional Industrial.	• Not yet implemented • Amendments made to existing industrial district regulations rather than create a new district. • Some properties were rezoned from industrial to business park to transition them to higher-level employment; others were rezoned to residential for future redevelopment options
F. Enhance industrial areas' compatibility with nearby residential neighborhoods.	• On-going implementation through performance standards: off-street parking, landscaping and screening, architectural design, and signs • Some of these standards may be analyzed and updated during the zoning code update; expected 2023-2024
G. Prepare small area plans for both reinvestment industrial areas and transitional industrial areas where significant changes are anticipated.	• Not yet implemented, except the Former Sam's Club land use and development study (2020)

Goal 2.	**Promote the development of business park land uses in designated employment areas as a way to expand the city's employment base and opportunities, increase the city's tax base, and meet the changing market and technological needs of the business sector.**
Strategy	**Action**
A. Promote business park developments that utilize more efficient land use and building designs than traditional industrial development, such as multi-story buildings, multi-tenant buildings, and structured parking.	• Sam's Club land use and development study (2020)
B. Encourage and support new business park developments that are designed as employment centers that are integrated into the community with strong connections to adjacent public streets and spaces, natural features, transit, and other community amenities.	• Sam's Club land use and development study (2020) • On-going support of businesses within Beltline Industrial Park

C. Require that new business park developments provide efficient and attractive parking designs, appropriate landscaping, and high quality building architecture.	• Sam's Club land use and development study (2020)
D. Allow limited commercial and service uses that provide valuable services to, and extend hours of activity within, employment centers without eroding the employment focus of these areas, sites and buildings.	• On-going implementation through the Business Park zoning district, putting a maximum square footage on complementary commercial uses in business parks

Public Land Use Goals and Strategies

Goal 1.	**Ensure access to public land, parks, open space and facilities by the entire community, including children, adults, the elderly, those in multi-family housing, people of color, and those with mobility challenges.**
Strategy	**Action**
No strategies listed	• On-going implementation: 100% of residential areas are already within ¼ mile of parks or open space land

Goal 2.	**Maintain accessibility to community facilities and public places consistent with the Americans with Disabilities Act (ADA).**
Strategy	**Action**
No strategies listed	• ADA Transition Plan (2018) • Building and energy department reviews all building projects for compliance with current MN ADA codes

Goal 3.	**Consider increasing natural environment areas on public land.**
Strategy	**Action**

No strategies listed	• Pollinator friendly policy was recently adopted • The city's departments are working on implementing no-mow areas

Economic Development Goals and Strategies

Goal 1. Promote economic development and redevelopment activities that enhance the livability and vitality of the community.	
Strategy	**Action**
A. Maintain and promote economic development financing policies and programs to assist with redevelopment and revitalization of the city's commercial, office, and industrial areas.	• Tax Increment Financing Policy update (2021) and various small business assistance programs such as the Revolving (gap financing) Loan, 2% Loan, and Advance commercial assistance programs.
B. Promote sustainable building projects consistent with the city's Green Building Policy energy savings and water conservation targets, Leadership in Energy and Environmental Design (LEED) standards, State of Minnesota B3 Guidelines, or comparable green certification applicable for each project's particular development type.	• Green Building Policy update (2022) • Efficient Building Benchmarking Ordinance • Property Assessed Clean Energy (PACE) and Revolving Loan Fund financial resources can be used for energy efficiency and renewable energy improvements to buildings.
C. Encourage efficient, compact redevelopment that results in the highest and best land uses so as to minimize energy and infrastructure costs.	• On-going implementation • Encourage infill development and redevelopment areas to result in best land uses and most efficient use of land
D. Encourage economic development and redevelopment that incorporate Livable Communities planning principles as established in the Land Use section of the 2040 Plan.	• On-going implementation
E. Promote the development of new market rate and affordable housing which will provide residents with additional housing options, assist in retaining and attracting talent for area employers, and further support local commercial businesses.	• Inclusionary Housing Policy (2020) • On-going implementation

F. Encourage redevelopment that incorporates efforts to achieve the goals of the Climate Action Plan, such as renewable energy resources, on-site and community solar, purchase of renewable energy credits through electric utility programs, and other such efforts that reduce energy usage.	• Green Building Policy update (2022) • Efficient Building Benchmarking Ordinance • Solar Sundown reimbursements

Goal 2.	**Foster the expansion, redevelopment and revitalization of the city's commercial, industrial and business park areas through environmentally sustainable projects.**
Strategy	**Action**
A. **Balance available land resources and future growth demands to ensure that the city has an adequate amount of land guided for commercial, office, and industrial uses to maintain a healthy tax base, offer adequate high-quality employment opportunities, and provide desirable goods and services.**	• The comprehensive plan land use plan, and the associated zoning maintains areas for high-quality employment throughout the city. • Creative reuse of Sams Club building into new employment center for 500+ jobs
B. **Encourage and support expansion, redevelopment and revitalization that contribute to a diverse and healthy mix of desirable commercial, office and industrial development types.**	• Rezoning from C-2 to BP and O districts
C. **Maintain and expand public infrastructure systems (e.g. streets, Fiber, and utilities) that provide adequate connections and capacities to meet the future needs of the city's business areas.**	• On-Going Implementation • Streets and public utility maintenance and expansion are considered during every development review, with city engineering staff taking the lead. Fiber-readiness is included as a criteria of development
D. **Undertake redevelopment planning studies to explore options and establish plans for redevelopment and revitalization of identified redevelopment study areas.**	• Sam's Club land use and development study (2019) • Historic Walker Lake area plan (2019)

E. **Collaborate with property owners and developers in SWLRT station areas to intensify or redevelop business areas consistent with Transit**	• Developments considered with TOD lens and using LRT station area plans:
	  ○ Corsa (Beltline Station)
	  ○ Risor (Beltline Station)

Oriented Development best practices and the city's LRT station area plans.	○ Beltline Station Development (Beltline Station) ○ Nordic Ware (Beltline Station) ○ PLACE (Wooddale Station) ○ OlyHi (Wooddale Station) ○ The Elmwood (Wooddale Station) ○ Louisiana Crossing (Louisiana Station)
F. **Collaborate with property owners to provide new services, amenities and land uses that strengthen their business area or creatively reuse underutilized business areas.**	• Historic Walker Lake area plan (2019) • Sam's Club land use and development study (2019) • West End artesian market

Goal 3. Retain and foster the growth of St. Louis Park's existing high-quality businesses.	
Strategy	**Action**
A. Promote strong relationships between existing businesses, government, and neighborhoods to promote a healthy and compatible working and living environment.	• Business retention and expansion program • Small business liaison • On-going implementation
B. Support the expansion of existing high-quality businesses that have an environmentally-sound track record, provide desirable goods and services, and offer quality jobs (e.g. stable employment and/or attractive wages and benefits).	• Revolving Loan Fund & Two Percent Loan Program • Building Operations Champion's Program • Climate Champions Program • On-going implementation
C. Provide public financing policies and programs that help existing businesses with stay or expand in St. Louis Park (e.g. tax increment financing, private activity bonds, revolving loan fund).	• Tax Increment Financing Policy update (2021) • Revolving Loan fund • Two Percent Loan Program • Advance commercial assistance program • Other small business assistance resources and programs.

D. Collaborate with agencies that provide education, skill training and job placement to ensure that St. Louis Park provides a sound base of qualified employees for its employers.	• Open to Business program • Hennepin County Elevate Business program • DEED Small Business Hub • On-going implementation

Goal 4. Assist the startup, growth, diversification, and expansion of the city's small businesses.	
Strategy	**Action**
A. Continue to link small businesses with resources and organizations that provide information and financial assistance needed for the retention and growth of small and locally-owned businesses.	• On-going implementation • In the spring of 2020, city staff reached out to 2500 local businesses via phone calls and emails to gauge impacts during pandemic • Continued business outreach via phone, email, social media, website and newsletters • Small business liaison and business resources on the city website
B. Enhance opportunities for partnerships between public and private entities that promote economic vitality of small businesses.	• On-going implementation • Business Council • Coordination with Hennepin County programs such as Elevate Business and DEED via their Business Hub
C. Continue to assist small businesses in identifying appropriate locations within the city.	• On-going implementation • Small business Liaison • Available commercial property search map on the city's website
D. Promote small businesses with an emphasis on women, minority and veteran owners to diversify and further strengthen the economic fabric of the city.	• Diversity, equity and inclusion (DEI) policy • Two rounds of Business Relief funding during COVID. Partnered with Hennepin County in round 2 to reach more small businesses.
E. Research, develop and implement innovative and creative programs in which to assist entrepreneurs and small businesses to expand and/or	• On-going implementation through small business financial and technical assistance programs.

locate in St. Louis Park (i.e., affordable rent programs, grants, loans, incentive programs, etc.).	• Affordable commercial space initiative • Advance commercial business assistance program?

Goal 5. Recruit new businesses that are compatible with and complementary to St. Louis Park's existing businesses.	
Strategy	**Action**
A. **Promote St. Louis Park's strategic benefits as a prospective business location including: its first ring location in the Twin Cities metro area, convenient transportation access including easy highway access and the future SWLRT line, a high-quality workforce, and numerous community amenities.**	• Discover St. Louis Park convention and visitor's bureau "Minnesota's Sweet Spot" marketing and services. • On-going implementation • Marketing on the city's web site and through occasional special promotions. • Promote the city on an on-going basis to prospective businesses, and through real estate brokers, site selection consultants, Greater MSP, and DEED.
B. **Focus the city's business attraction efforts on industry sectors with a track record of environmental sensitivity and provision of quality jobs (i.e. stable employment and attractive wages and benefits). Such industries include: headquarters and business services, financial services and insurance, health and life sciences; advanced manufacturing and technology.**	• Bridgewater Bank HQ, Loffler HQ, Xchange Medical Office, 10 West End office tower and its tenants, Westside Center and its tenants, and remodeled West End Park and Health Partners building examples. • Green Building Policy amended in 2021 • On-going implementation
C. **Encourage and support the assembly of smaller obsolete business sites into larger sites that can accommodate the development of new buildings to fit contemporary business needs and standards and will attract new businesses to St. Louis Park.**	• With a few rare exceptions, this goal may contradict other the city goals. A past example where this was implemented is the Highway 7 Corporate Center at Highway 7 and Monitor Avenue. There may be opportunities at a smaller scale to do so in the Louisiana Avenue Station area. We would not broadly employ this strategy and it would be somewhat discouraged, at least at a large scale, in Historic Walker Lake for example.

Housing Goals and Strategies

Goal 1.	**The City of St. Louis Park will promote and facilitate a balanced and enduring housing stock that offers a continuum of diverse life-cycle housing choices suitable for households of all income levels including, but not limited to affordable, senior, multi-generational, supportive and mixed-income housing, disbursed throughout the city.**
Strategy	**Action**

A. **Create a broad range of housing types to provide more diverse and creative housing choices to meet the needs of current and future residents.**	• Zoning Audit and Residential District Audit (2022)
	• Upcoming changes to the zoning code as recommended in the zoning audit (2023)
	• There have been a number of recent developments that have added varieties of housing types
	  ○ 55+ buildings including Risor, Elmwood, OlyHi, and Beltline Station
	  ○ Affordable buildings in Beltline Station, Rise on 7, Union Park Flats, and Arbor House
	  ○ Townhome units in Volo
	  ○ Varying building sizes in Parkway Residences
	• Minnetonka Boulevard redevelopment

B. **Review existing policies, programs and regulations to remove barriers to innovative and creative housing options.**	• Accessory dwelling unit (ADU) ordinance (2020) • Upcoming changes to the zoning code (2023-2024)
C. **Ensure new housing policies promote fair and equitable housing choices.**	• On-going implementation
D. **Use data and research to guide and evaluate housing priorities, policies, and programs.**	• Current housing study by Maxfield • Metropolitan Council goals • Affordable housing dashboard launched in 2021 • Annual housing activity report • Summary of proposed inclusionary housing policy changes provided in October 2022.

E. **Use infill and redevelopment opportunities to assist in meeting housing goals.**	• Development projects dashboard launched in 2021 provides examples and metrics. • Zoning code amendments planned for 2023 based on 2022 zoning audit. • On-going implementation
F. **Create policies, tools and strategies to promote the goals of the city's climate action plan, encouraging energy efficiency and reducing energy consumption in residential properties.**	• Green building policy • Climate champions program • Energy efficient rebates • Home Energy Squad
G. **Create senior housing opportunities: both market rate and affordable, homeownership and rental, and active and supportive.**	• Number of senior rental opportunities including the Elmwood, Risor, and OlyHi

Goal 2. Single Family Homes: The city is committed to creating, preserving, and improving the city's single-family housing stock.	
Strategy	**Action**
A. Promote the creation of family-sized, owner-occupied, single-family homes that meet the needs and desires of current and future residents through the expansion of existing homes and through construction of new homes.	• Move Up in the Park Loan • Remodeling Advisor • Architectural Design Program • Loans • Minnetonka Boulevard homeownership project
B. Proactively address substandard housing properties through code enforcement and public or private redevelopment activities such as acquisition, demolition and housing replacement.	• Property maintenance inspections, point of sale inspections, rental licensing, construction management plan administration • Minnetonka Boulevard homeownership project
C. Promote high-quality architectural design standards of homes through the use of good design practices which are complementary and compatible with the neighborhood, utilizing quality materials and superior construction.	• Architectural design assistance program • Remodeling assistance program • Zoning code architectural design standards

D. Allow for Accessory Housing Units (AHUs) in all low density residential areas.	• ADUs in Religious Institutions (2017) • Accessory Dwelling Units ordinance (2020)
E. Allow for two-family dwelling units (twin homes and duplexes) on appropriately-sized lots in low density residential areas.	• Upcoming changes to zoning resulting from zoning audit, expected 2023

Goal 3.	**Multi-Family: The city is committed to promoting quality multi-family developments, both rental and owner occupied, in appropriate locations, including near transit centers, retail and employment centers and in commercial mixed use districts.**
Strategy	**Action**
A. **Promote the preservation and maintenance of existing multi-family housing stock.**	• Property maintenance codes and rental licensing standards • Multi-family rehab loan program
B. **Promote high-quality architectural design in the construction of new multi-family developments.**	• On-going implementation through development review process and zoning architectural design standards
C. **Be proactive in analyzing and guiding redevelopment opportunities for multi-family developments.**	• On-going implementation
D. **Increase densities and housing options on high-frequency transit routes and near rail stations.**	• Partially implemented through rezoning to MX-1 around TOD areas • All PUDs that have been approved in TOD areas meet the density requirements of the comprehensive plan • Will be further explored through updates to TOD small area plans and TOD zoning district, expected 2023-2024

Goal 4.	**Residential Rental Housing: The city is committed to creating, preserving and improving the city's rental housing stock.**
Strategy	**Action**

A. **Ensure rental housing is well-maintained and safe through policies and programs for property owners including building inspections, education and rehabilitation resources.**	• Rental license ordinance • Landlord training program
B. **Promote the inclusion of family-sized units (2 and 3 bedroom) in newly constructed multi- family developments.**	• Inclusionary housing regulations require a certain percentage of units be 3-bedrooms • Establishment of the AHTF
C. **Minimize the involuntary displacement of people of color, indigenous people and vulnerable populations, such as low-income households, the elderly and people with disabilities from their communities as neighborhoods grow and change.**	• Tenant protection ordinance • Naturally-occurring affordable housing (NOAH) one-for-one replacement requirement in the inclusionary housing policy • Land trust acquisitions

Goal 5.	**Home Ownership: The city is committed to promoting home ownership, including affordable homeownership options and exploring traditional and non-traditional owner-occupied housing options such as: row houses, courtyard housing, high-rises, live-work units, three-story homes, co-housing, Land Trust, Habitat sponsored homes, and multi-generational housing.**
Strategy	**Action**
A. **Promote and facilitate a balanced and sustainable housing stock to meet diverse needs for today and in the future.**	• Inclusionary Housing policy encourages development of housing with 3–4-bedroom units • Green building policy • Green remodeling program • Affordable Housing Trust Fund creates deeper levels of affordability for projects and so that they may remain affordable long-term
B. **Continue promoting first-time home buyer, homeownership counseling, down payment, and other assistance programs.**	• Annual housing activity report detail these activities. Staff will report to council in March 2023.

C. **Expand homeownership opportunities and improve access to homeownership, especially for low-income residents, people with disabilities, and people of color.**	• First-generation PPA program • Down payment assistance • Land trust • Legacy program • Minnetonka Boulevard homeownership project
D. **Explore strategies and tools to prevent loss of affordable homeownership opportunities, especially near light rail transit station areas.**	• Naturally-occurring affordable housing (NOAH) one-for-one replacement requirement in the inclusionary housing policy • Land trust

Goal 6. Affordable Housing: The city is committed to promoting affordable housing options for low- and moderate-income households.	
Strategy	**Action**
A. **Ensure affordable housing is disbursed throughout the city and not concentrated in any one area.**	• Inclusionary Housing policy
B. **Continue to support the preservation of naturally-occurring affordable housing.**	• Home Improvement Loan Programs • Legacy program
C. **Promote the inclusion of affordable housing in new developments, including those located near the Southwest Light Rail Transit Corridor and other transit nodes, retail and employment centers and commercial mixed-use districts.**	• Inclusionary Housing policy • Affordable Housing Trust Fund for deeper affordability • Support for low-income housing tax credit projects to provide for all-affordable buildings. • Support for the reuse of religious institution sites for affordable housing
D. **Pursue policies, tools and programs to ensure long-term housing affordability for households at or below 30, 50, 60 and 80% of AMI.**	• Inclusionary Housing policy
E. **Pursue innovative strategies to maximize the creation and preservation of affordable housing:**	• On-going implementation of all the programs and partnerships recommended in the strategy: ○ Inclusionary Housing policy

i. Continue the implementation of the Inclusionary Housing Policy. **ii. Support shallow rent subsidy programs to promote the ability of rental households to secure and maintain stable housing (such as Kids in the Park).** **iii. Develop additional strategies to ensure long-term housing affordability, such as the city's Tenant Protection Ordinance, non-discrimination of rental subsidy, reductions in fees, incentives, and others.** **iv. Continue and strengthen partnerships with local nonprofits who are addressing housing needs and challenges in St. Louis Park, including St. Louis Park Emergency Program, Community Action Program - Hennepin County, Project for Pride in Living and others.** **1. Partnership support may include funding to carry out the tasks of the Housing Authority or city to preserve housing & avoid displacement of citizens.** **v. Continue acceptance and support of transitional and supportive housing programs for specialized groups and affordable housing providers.** **vi. Promote safe, stable and affordable housing opportunities and strategies for homeless youth, singles, and families. Continue to support households at risk of homelessness through programs such as the Stable HOME program and STEP Emergency Program.** **vii. Continue to engage in regional dialog and collaboration to expand and maximize affordable housing resources and tools at the local, regional, state and federal levels.**	○ Kids in the Park program ○ St. Louis Park Emergency Program ○ Community Action Program – Hennepin County ○ Project for Pride in Living ○ Tenant Protection Ordinance ○ Stable HOME program ○ STEP Emergency
F. **Continue successful administration of the Housing Authority's core federally funded rental assistance programs, including maximizing program utilization, ensuring sound fiscal policies, securing renewal funding through the submission of competitive grant applications, and maintaining and improving the Public Housing properties.**	• On-going implementation within our housing division of the Community Development department • The Housing Authority (HA) is responsible for administering programs that ensure the availability of safe and desirable affordable housing options in the community. The HA has received high performer status from the

	Department of Housing and Urban Development (HUD). Since 2020 the HA has added 15 Family Unification Vouchers (FUP) and 25 Foster Youth to Independence (FYI) vouchers.

Goal 7. Preservation, Safety and Sustainability: The city is committed to ensuring all housing is safe and well maintained.	
Strategy	**Action**
A. **Strengthen the city's single- and multi-family home maintenance and rehabilitation programs.**	• Property Maintenance programs include Point of Sale, Licensing and code compliance. • Commercial and residential properties are required to have an inspection prior to sale. All corrections must be completed by the seller or assumed by the buyer. • Properties that are non-owner occupied are required to obtain a rental license. All licensed properties are inspected approximately every 2 years. • Approximately every 4 years the City does a sweep of all properties to address exterior conditions for code compliance.
B. **Preserve and enhance housing quality and design through code enforcement and the promotion of housing improvement programs related to home rehabilitation, design and housing safety.**	• On-going implementation of property maintenance programs such as Point of Sale, Licensing, and code compliance • Home inspection visits include check of smoke detectors and trip hazards • Home Improvement Loan Programs
C. **Encourage the use of green building practices, energy-efficient products, and sustainable methods in both single-family and multi-family housing construction.**	• Adopted a green building policy amendment to advance the city's environmental stewardship goals (2022) • Administered Solar Sundown program to incentivize installation of rooftop solar on existing properties (2021-2022) • Energy efficient rebates (2009-present) • Home Energy Squad program (2012-present)

	• Established Climate Champions programs for homes and for multifamily buildings to promote, incentivize and recognize energy efficiency improvements in housing stock (2023)
D. **Proactively address health hazards in housing and advance design that supports physical and mental health.**	• No specific programs aimed at these strategies, but a number of programs have benefits that result in reducing health hazards o Co-benefits of energy efficiency and electrification can include improved indoor air quality o Deferred loan program administered by Hennepin County requires lead testing
E. **Strengthen neighborhoods and neighborhood amenities to encourage residents to stay and reinvest in St. Louis Park.**	• On-going implementation through investment, maintenance, and enhancement of public facilities, especially parks, recreation, sidewalks, and bicycle facilities.

Public Art

*No Goals or Strategies listed

Historic Resources Goals and Strategies

Goal 1. Inventory the city's historic assets.	
Strategy	**Action**
A. **Create a plan to inventory key historic or architecturally significant buildings and features including: churches and synagogues, schools, residences of prominent citizens, distinctive residences by prominent architects or builders, distinctive commercial buildings, notable parks and public works elements and features.**	• No progress

B. **Conduct historical research and documentation on significant buildings and sites as they are being modified or demolished to keep as detailed of a historical record as possible.**	• No progress

Goal 2. Utilize opportunities to educate students and other residents about the historical assets of the city.	
Strategy	**Action**

A. **Educate the community on the importance of preservation, in general, and also about the individual designated buildings and districts. Work with the school district to develop classroom curriculum about St. Louis Park history.**	• Historic Walker Lake small area plan
	• No specific city programs, but the city supports the historical society in a number of their projects
	  ○ Donation of original house blue prints to historical society
	  ○ Historical society published a book

B. **Utilize available historical photographs, maps and artifacts to focus attention upon the city's history and historical assets**	• No progress, but the historical society maintains a website, index, newsletter, collection of artifacts, etc.

Planning and zoning studies listed in the Implementation chapter

Planning studies	
Study	**Status**
Historic Walker Lake Revitalization Plan	Complete • Historic Walker Lake design guidelines (2019) • Historic Walker-Lake small area revitalization plan (2019) • MX-2 mixed-use zoning district • MX-2 parking ordinance

Texa-Tonka Neighborhood Commercial Node	Complete • Texa-Tonka small area plan (2020)
Neighborhood commercial nodes study for new mixed-use areas	Progress • Reviewed by city staff and planning commission and some commercial areas were rezoned to mixed use
Park Commons Plan Update (Park Commons West)	No progress
Food Access Study	Complete • Food access and insecurity study summary, full report (2020)
CSAH #25: Feasibility Plan	Complete • CSAH 25 Conceptual Road Layout (2019) • Some elements will be implemented by METRO Green Line Extension and Hennepin County CSAH 5 projects
Commercial areas – new small area plan(s)	Progress • Former Sam's Club site land use and development study (2020) • Budgeted planning effort to "refresh" the three light rail station area plans and Excelsior Boulevard west of Highway 100 in 2023

Zoning studies	
Study	**Status**
Rezoning areas to align with updated 2040 future land use map	Complete

	• Rezoned more than 70 properties to be consistent with the future land use map (2019)
Rezoning areas from C-2 to C-1	Complete • Rezoned 78 parcels (2020) • Size limits also added retail and service uses in the C-1 district (2020)
Parking reductions	Complete (but reviewed periodically) • New parking requirements adopted (2021) • Council direction to review commercial corridor parking to further reduce parking requirements in neighborhood commercial nodes where public on-street parking is available nearby in 2023.
Accessory dwelling units	Complete
Transitional industrial district	Progress • Amended existing industrial districts rather than create a new district
Transit-oriented development ordinance / form-based code	Progress • Code drafted but never adopted • Evaluating further through zoning audit

Executive summary

Title: 2023 Pavement Management Project – Lenox, Oak Hill, Texa-Tonka and Eliot View (4023-1000) – Wards 3 and 4

Recommended action: None at this time. This report is intended to provide an overview of the proposed 2023 Pavement Management project. This project will have a public hearing on the first council meeting in January 2023. Council will be asked to take action on this project at the second council meeting in January 2023.

Policy consideration: Does the city council wish to pursue the pavement rehabilitation, utility improvements and sidewalk installation recommended as a part of this project?

Summary: The annual Pavement Management project rehabilitates several miles of local residential streets. In 2023, the streets to be rehabilitated are in Pavement Management Area 1 (Lenox, Oak Hill, Texa-Tonka and Eliot View neighborhoods). Street rehabilitation work consists of replacing the existing bituminous pavement and replacing the concrete curb and gutter as needed. Other work includes sidewalk repairs, sewer repairs and watermain replacement.

There are new sidewalk segments being proposed adjacent to multi-unit naturally occurring affordable housing in this project. The funding of additional new sidewalk and traffic management elements is being diverted to complete a citywide vulnerability assessment of the sanitary sewer and water system to identify potential areas in the city where mitigation should be considered, as well as area of additional capital investment.

Financial or budget considerations: This project is included in the city's 2023 capital improvement plan (CIP) and will be paid for using franchise fees, utility funds, and general obligation bonds (sidewalks). A construction cost estimate is being finalized and will be provided as a part of the Jan. 3 public hearing report.

Strategic priority consideration: St. Louis Park is committed to providing a variety of options for people to make their way around the city comfortably, safely and reliably.

Supporting documents: Discussion
Attachment #1: Project scope and sidewalk recommendation map
Attachment #2: Sidewalk segment matrix

Prepared by: Aaron Wiesen, project engineer
Reviewed by: Debra Heiser, engineering director
Approved by: Kim Keller, city manager

Discussion

Background

The city's pavement management program (PMP) proactively addresses the condition of the residential streets within the city. Many of these streets are now 50 years of age or more. The city's residential streets are still in relatively good condition due to the fact that the streets were built well, are generally situated on good soils, utilize curb and gutter for drainage, and have been well maintained. City maintenance crews have continually worked to keep residential streets in good condition using maintenance strategies such as patching and seal coating. However, as pavements age, more aggressive maintenance strategies are needed to prolong their life.

The PMP was developed in 2003 to extend pavement life and enhance system-wide performance in a cost-effective and efficient way by providing the right pavement strategy at the right time. Using pavement management software, staff documents street condition ratings and monitors their performance. Staff then evaluates the condition of streets and selects cost-effective treatments to extend pavement life.

Project description

This year's project will be performed in Area 1 of the city's eight pavement management areas. It includes work in the Lenox, Oak Hill, Texa-Tonka and Eliot View neighborhoods. The attached maps identify the streets that have been selected for rehabilitation and outline the various work to be performed on each street. The selection was based on street condition and field evaluations to determine the condition of the pavement, curb and gutter, and the city's underground utilities. A team of staff members from streets, utilities, and engineering worked together to select streets and to recommend appropriate rehabilitation techniques for inclusion in this year's Pavement Management Project.

Many of the street segments are proposed to include additional infrastructure upgrades such as watermain replacement, sanitary sewer repairs, storm sewer construction, and sidewalk installation.

The funding of additional new sidewalk and traffic management elements is being diverted to complete a citywide vulnerability assessment of the sanitary sewer and water system to identify potential areas in the city where mitigation should be considered, as well as area of additional capital investment.

Watermain and water service replacement

The watermain on these streets is approximately 60-75 years old and experiencing deterioration. The work will consist of replacing the watermain and the water services to the curb stop. The watermain is approximately 7.5 feet deep and located under or near one of the curb lines, running parallel to the street. The watermain will be replaced by using a "trenchless" method. This method pulls an expansion head attached to a new pipe through the old pipe, the head expands and pushes away the existing cast iron pipe while simultaneously replacing it with new HDPE plastic pipe. The street remains passable during installation, resulting in less impact than open trench watermain replacement, minimizing disruption to the neighborhood.

The water services connect to the watermain, run to the curb stop and then to the house. The curb stop is located between the curb and gutter and the right of way line. The city owns the water service between the watermain and the curb stop, while the property owner owns the water service between the curb stop and the house.

As a part of this project, the water service is proposed to be replaced between the watermain and the city-owned curb stop. The water service is also approximately 7.5 feet deep and must be open-cut to replace. Replacing water services has significant impacts on existing trees, landscaping, sidewalks, driveways, retaining walls, etc.

Street widths

Since the watermain is replaced by the trenchless method, the entire length of curb on both sides of the street is not necessary to be removed for watermain construction. Since the curb is not being removed for watermain work, there is not an opportunity to consider changes to existing street widths as a part of the project.

Parking restrictions

The Dakota-Edgewood bridge and trail construction in 2021 created a critical pedestrian and bicycle connection over the BNSF railroad. As a part of this project, a multi-use trail was built on the east side of Edgewood Avenue, between Eliot View Road and the BNSF railroad. To accommodate this trail within existing right of way, the road width was reduced by 10.5 feet.

This project started in the fall of 2020 and was not completed until 2021, with punch list work in 2022. Where the road width was reduced, no parking signs were temporarily installed along the west side of the road. This was to provide adequate space for commercial vehicle travel, contractor vehicles, material storage, and turn movements into and out of adjacent properties. Initially, these were installed as temporary signs; however, the temporary signs did not hold up. Due to this, permanent signs were installed to minimize maintenance and promote compliance.

As a part of this year's PMP project, a mill and overlay is proposed on Edgewood Avenue from Cedar Lake Road to the BNSF railroad. Staff has reviewed the turn movements into and out of adjacent properties and recommends leaving the permanent signs in place, resulting in formalizing these parking restrictions along the west side of Edgewood Avenue from Eliot View Road to the BNSF railroad. This will be brought for council approval as part of the final project approval.

Traffic management

There was not a traffic management pilot project completed as a part of the project design. However, staff still responded to traffic questions that were brought forward as a part of the public process. Residents requested that staff review eight intersections for the possible installation of stop signs. These stop sign requests were evaluated both at the intersection level and within the neighborhood context. None of the requested locations met the criteria for stop sign installation. As a result, there are no changes being brought to the council as a part of this project.

Street trees

A tree inventory has been completed on streets with watermain and sidewalk construction. This inventory reviewed the size, species, health, and condition of all the trees. As a part of the design, staff will work to preserve existing boulevard trees to the maximum extent possible. There are nine trees (110 caliper inches) that are being recommended for removal because of sidewalk construction. Tree replacement will be completed based on the city's tree ordinance. Street trees will be planted in the neighborhood the year following construction.

Sidewalks

There are new sidewalk segments being proposed adjacent to naturally occurring affordable multi-family housing (NOAH) in this project. These are located on Rhode Island Avenue and Oak Park Village Drive.

In all, 0.51 miles of sidewalk were identified to be considered as a part of this project. Staff is recommending that 0.38 miles of sidewalk be approved for construction as part of the 2023 Pavement Management project.

The sidewalk segments were broken down block by block and evaluated individually for impacts, costs, and returns. On both Rhode Island Avenue and Oak Park Village Drive, both sides of the street were evaluated. Individual evaluation sheets for each of the segments are included in this report. Staff has not received any comments pertaining to the proposed sidewalk segments so far.

These segments, if approved, would be constructed at no cost to the property owners, and the city would be responsible for future repairs to defective sidewalk panels. Since they provide missing sidewalk connections to NOAH properties, they will be designated as community sidewalks, and the city primarily responsible for snow removal.

The council has shared the importance of understanding the cost-effectiveness and return on investment (ROI) that the recommended sidewalk network provides. To do this, staff evaluated the sidewalk segments block by block for impacts, costs, and returns. For each block, the impacts of sidewalk construction on both sides of the street were evaluated to create the system recommended. Staff recommendation is based on the side of the street with the lower impact and cost. Consistent with past council direction, special attention was given to preserving street trees and connectivity when all other impacts were similar.

The impacts and cost to build these sidewalks are typical. The expanded sidewalk network removes barriers to walking by filling in gaps, creates connections to destinations in the neighborhood and beyond, and is consistent with the vision for the community. For these reasons, the recommended sidewalks will create a positive return on investment for the neighborhood and the community.

Number	Description	Maintenance responsibility	Build in 2023?
1	**Oak Park Village Drive - north side (Oak Park Village Drive to Louisiana Avenue)**	**Community sidewalk (City)**	**Yes**
2	**Oak Park Village Drive - south side (Oak Park Village Drive to parking lot entrance)**	**Community sidewalk (City)**	**Yes**
3	Oak Park Village Drive - south side (Parking lot entrance to Louisiana Avenue)	Community sidewalk (City)	No
4	**Rhode Island Avenue - south side (28th Street to dead end)**	**Community sidewalk (City)**	**Yes**
5	Rhode Island Avenue - north side (28th Street to Victoria Circle)	Community sidewalk (City)	No
6	**Rhode Island Avenue - north side (Victoria Circle to dead end)**	**Community sidewalk (City)**	**Yes**

Public process

There have been several opportunities for residents to learn more about the proposed project and to provide feedback on the proposed project. Notifications were done through letters, postcards, neighborhood associations, NextDoor, GovDelivery, and the city website. What follows is a summary:

1. Letter – Preliminary survey (June 2021)
    - Staff sent a letter to the neighborhood notifying them that the data collection/ preliminary survey was to begin in preparation for the Pavement Management project. This was the first letter to the neighborhood on this project.
2. Kickoff Postcard – interactive map (July 2022)
    - A postcard was sent out to invite the neighborhood to provide feedback using an interactive GIS map, contacting city staff, or visiting the project website.
    - The interactive map had 27 comments that included stop sign requests, drainage, and existing sidewalk condition concerns.
3. Open house (Nov. 2022)
    - The open house letter sent to the neighborhood included a summary of the feedback received.
    - The purpose of the open house was to provide attendees with an opportunity to review the preliminary design for streets and sidewalks. Layouts were prepared that showed impacts to trees, landscaping, retaining walls, etc. Residents were able to look at layouts, ask questions, write notes on the plans, and provide feedback on this preliminary design. Where possible, staff incorporated these comments into the final design. Feedback from this meeting ultimately helps guide staff on the final designs.
    - There were approximately 12 residents at this open house out of 2084 properties mailed.
    -

4. City council study session report (Dec. 12, 2022)
    - This study session report provides an overview of the project and staff recommendations.
5. Public hearing city council meeting (Jan. 3, 2023)
    - The public hearing will provide an opportunity for residents to speak to the council regarding the project.
6. Project approval city council meeting (Jan. 17, 2023)
    - The council will be asked to approve the project as recommended or approve a modified project based on resident feedback.

If residents were unable to attend the meeting or if they had specific concerns, staff met with them on-site. Staff made modifications to the design using the information gathered from the open house, individual visits, phone calls, and emails. Where impacts could not be avoided, staff proposed mitigation.

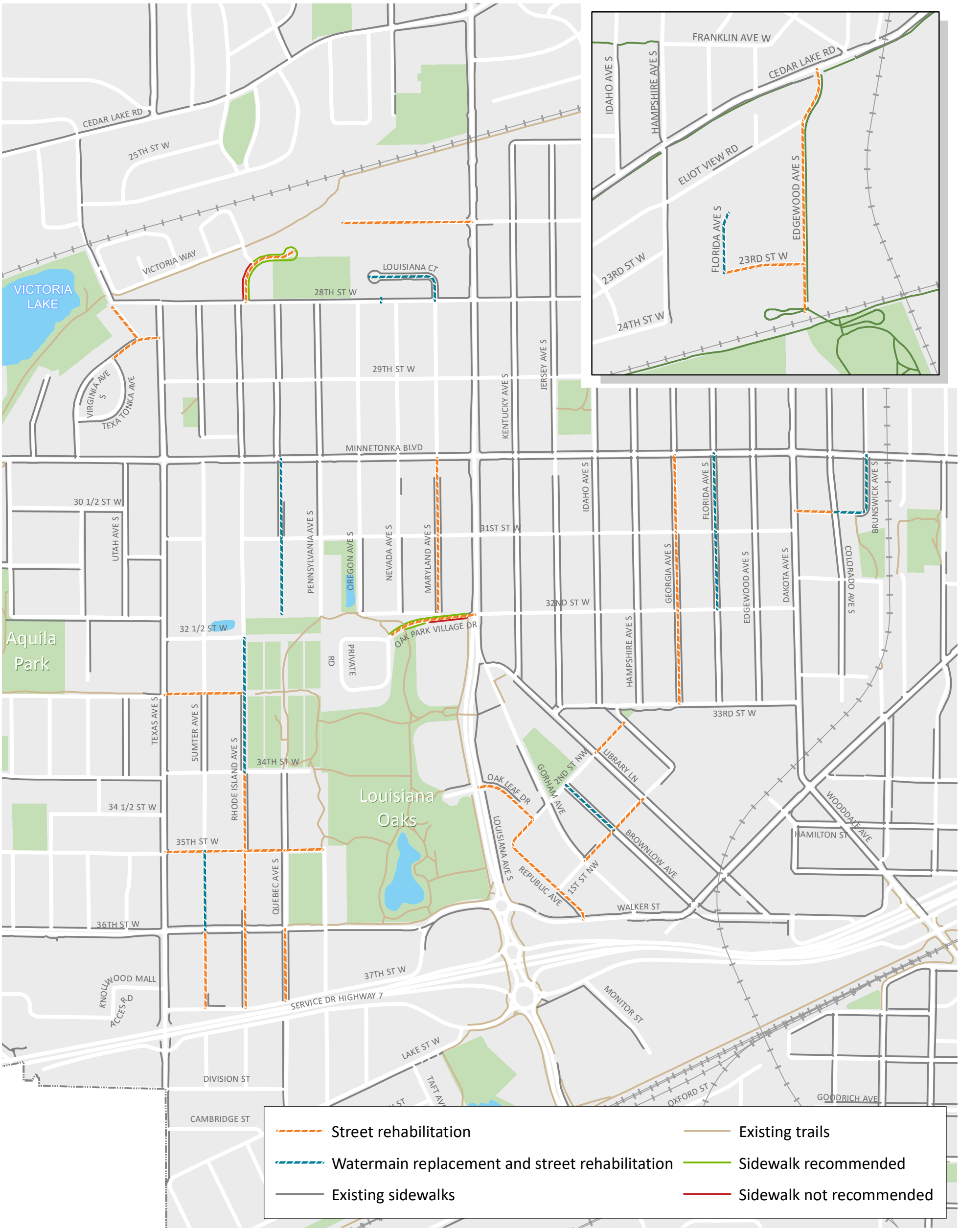
Engineering staff worked closely with parks and recreation staff to ensure the network of sidewalks being built would meet the objectives for tree preservation/replanting. The public works staff also weighed in on the new sidewalk segments to ensure that there were acceptable widths and design features for snow removal.

Next steps

The proposed schedule for the segments recommended by staff to facilitate construction in 2023 is as follows:

Council study session	Dec. 12, 2022
Council public hearing	Jan. 3, 2023
Council project approval	Jan. 17, 2023
Council awards construction bids	Early April 2023
Construction	May to Nov. 2023

2023 Pavement Management - Staff Recommendations



Date: 12/2/2022

Attachment #2: Sidewalk segment matrix

Segment #1 Oak Park Village Drive - north side (Oak Park Village Drive to Louisiana Avenue)	
Data:	
Traffic volumes	NA
Average speed	NA
Design:	
Right of way (ROW width)	50 feet
Distance from back of curb to ROW	10-14 feet
Proposed boulevard width	0 to 6 feet
Proposed concrete sidewalk width	6 feet
Proposed sidewalk length	691 feet (100%)
Existing sidewalk length	0 feet (0%)
Snow removal responsibility	Community sidewalk (City)
Impacts:	
Trees in boulevard	6 trees
Trees removed	4 trees (30 total caliper inches)
Properties adjacent to proposed sidewalk	1 city property
Driveway impacts (slope, length, etc.)	None
Landscaping	None
Retaining walls	Approx. 90 feet of new retaining wall required
Private utility relocations	None
Financial:	
Construction cost	$105,000
Cost per liner foot of new sidewalk	$152 / LF
Staff recommendations:	
Build in 2023?	Yes
Recommendation based on	Provides a sidewalk connection from Louisiana Avenue to the trails that go through Louisiana Oaks Park.

Segment #2 Oak Park Village Drive - south side (Trail to parking lot entrance)	
Data:	
Traffic volumes	NA
Average speed	NA
Design:	
Right of way (ROW width)	50 feet
Distance from back of curb to ROW	9 feet
Proposed boulevard width	2 to 6 feet
Proposed concrete sidewalk width	6 feet
Proposed sidewalk length	177 feet (100%)
Existing sidewalk length	0 feet (0%)
Snow removal responsibility	Community sidewalk (City)
Impacts:	
Trees in boulevard	1 tree
Trees removed	1 tree (20 total caliper inches)
Properties adjacent to proposed sidewalk	1 city property, 1 apartment property
Driveway impacts (slope, length, etc.)	None
Landscaping	None
Retaining walls	None
Private utility relocations	None
Financial:	
Construction cost	$22,000
Cost per liner foot of new sidewalk	$125 / LF
Staff recommendations:	
Build in 2023?	Yes
Recommendation based on	Provides a sidewalk connection from the apartments on Oak Park Village Drive to the trails that go through Louisiana Oaks Park.

Segment #3 Oak Park Village Drive - south side (Parking lot entrance to Louisiana Avenue)	
Data:	
Traffic volumes	NA
Average speed	NA
Design:	
Right of way (ROW width)	50 feet
Distance from back of curb to ROW	0 to 9 feet
Proposed boulevard width	0 to 2 feet
Proposed concrete sidewalk width	6 feet
Proposed sidewalk length	355 feet (100%)
Existing sidewalk length	0 feet (0%)
Snow removal responsibility	Community sidewalk (City)
Impacts:	
Trees in boulevard	None
Trees removed	None
Properties adjacent to proposed sidewalk	1 city property, 1 apartment property
Driveway impacts (slope, length, etc.)	None
Landscaping	None
Retaining walls	None
Private utility relocations	1 light pole
Financial:	
Construction cost	$52,000
Cost per liner foot of new sidewalk	$147 / LF
Staff recommendations:	
Build in 2023?	No
Recommendation based on	Not enough right of way to build sidewalk.

Segment #4 Rhode Island Avenue - south side (28th Street to dead end)	
Data:	
Traffic volumes	NA
Average speed	NA
Design:	
Right of way (ROW width)	60 feet
Distance from back of curb to ROW	11 to 12 feet
Proposed boulevard width	4 feet
Proposed concrete sidewalk width	6 feet
Proposed sidewalk length	652 feet (100%)
Existing sidewalk length	0 feet (0%)
Snow removal responsibility	Community sidewalk (City)
Impacts:	
Trees in boulevard	2 trees
Trees removed	2 trees (36 total caliper inches)
Properties adjacent to proposed sidewalk	1 apartment property, 1 city park
Driveway impacts (slope, length, etc.)	None
Landscaping	Minor impacts to landscaping near outwalks of apartment building
Retaining walls	None
Private utility relocations	None
Financial:	
Construction cost	$78,000
Cost per liner foot of new sidewalk	$120 / LF
Staff recommendations:	
Build in 2023?	Yes
Recommendation based on	Provides a sidewalk connection from the apartments on Rhode Island Avenue to a park, regional trail and the existing sidewalks on 28th Street.

Segment #5 Rhode Island Avenue - North side (28th Street to Victoria Circle)	
Data:	
Traffic volumes	NA
Average speed	NA
Design:	
Right of way (ROW width)	60 feet
Distance from back of curb to ROW	11 to 12 feet
Proposed boulevard width	4 feet
Proposed concrete sidewalk width	6 feet
Proposed sidewalk length	350 feet (100%)
Existing sidewalk length	0 feet (0%)
Snow removal responsibility	Community sidewalk (City)
Impacts:	
Trees in boulevard	4 trees
Trees removed	4 trees (52 total caliper inches)
Properties adjacent to proposed sidewalk	1 property
Driveway impacts (slope, length, etc.)	None
Landscaping	Yes, there is landscaping in between the street and parking lot that would be removed for a sidewalk.
Retaining walls	None
Private utility relocations	None
Financial:	
Construction cost	$42,000
Cost per liner foot of new sidewalk	$120 / LF
Staff recommendations:	
Build in 2023?	No
Recommendation based on	Would have impacts to trees and landscaping. A sidewalk on the other side of the street would have a better connection to the park and apartment buildings.

Segment #6 Rhode Island Avenue - North side (Victoria Circle to dead end)	
Data:	
Traffic volumes	NA
Average speed	NA
Design:	
Right of way (ROW width)	60 feet
Distance from back of curb to ROW	11 to 12 feet
Proposed boulevard width	4 feet
Proposed concrete sidewalk width	6 feet
Proposed sidewalk length	472 feet (100%)
Existing sidewalk length	0 feet (0%)
Snow removal responsibility	Community sidewalk (City)
Impacts:	
Trees in boulevard	2 trees
Trees removed	2 trees (24 total caliper inches)
Properties adjacent to proposed sidewalk	1 apartment property
Driveway impacts (slope, length, etc.)	None
Landscaping	Landscaping near outwalks and parking lot that would be impacted
Retaining walls	None
Private utility relocations	There is 1 electrical pedestal that would be relocated
Financial:	
Construction cost	$54,000
Cost per liner foot of new sidewalk	$115 / LF
Staff recommendations:	
Build in 2023?	Yes
Recommendation based on	Provides a sidewalk connection from the apartments on Rhode Island Avenue to a park, regional trail and the existing sidewalks on 28th Street.

Executive summary

Title: MnDOT excess land update – Toledo Avenue and 28th Avenue – ward 1

Recommended action: None. This is a status report to city council.

Policy consideration: Does city council want staff to pursue acquisition of the land that Minnesota Department of Transportation (MnDOT) has deemed to be excess right-of-way?

Summary: MnDOT officially offered to convey to the city two parcels of land they deem to be excess right-of-way along Highway 100 in the 2800 block of Toledo Avenue South. We received these offers in response to the letter of interest we sent to MnDOT in February 2022. We have until May 22, 2023, to accept the offers and purchase the parcel(s). The city council previously received staff reports regarding this matter on November 22, 2021, and February 7, 2022.

The south parcel is 0.88 acres and includes the remnants of a retaining wall and rock landscaping of a former wayside rest operated on the site (Conveyance 2021-0067 on the attached map). The north parcel is 0.81 acres (Conveyance 2021-0066 on the attached map).

In essence, MnDOT is offering to give the city the south parcel provided the city only uses it for public park purposes. MnDOT is offering to sell the north parcel to the city for fair market value and without restrictions on the use. There are other standard conveyance conditions that MnDOT attached to the offers.

City staff will undertake reasonable due diligence to review the information MnDOT provided, including a phase I environmental report. Staff will discuss using the south parcel as public park land (passive or active use, including simply open space), and will also evaluate the north parcel. Staff will bring this item to city council for discussion and direction in early 2023 and potentially in a closed session, with adequate time to discuss and take any formal action needed to respond to the offers before MnDOT's deadline of May 22, 2023.

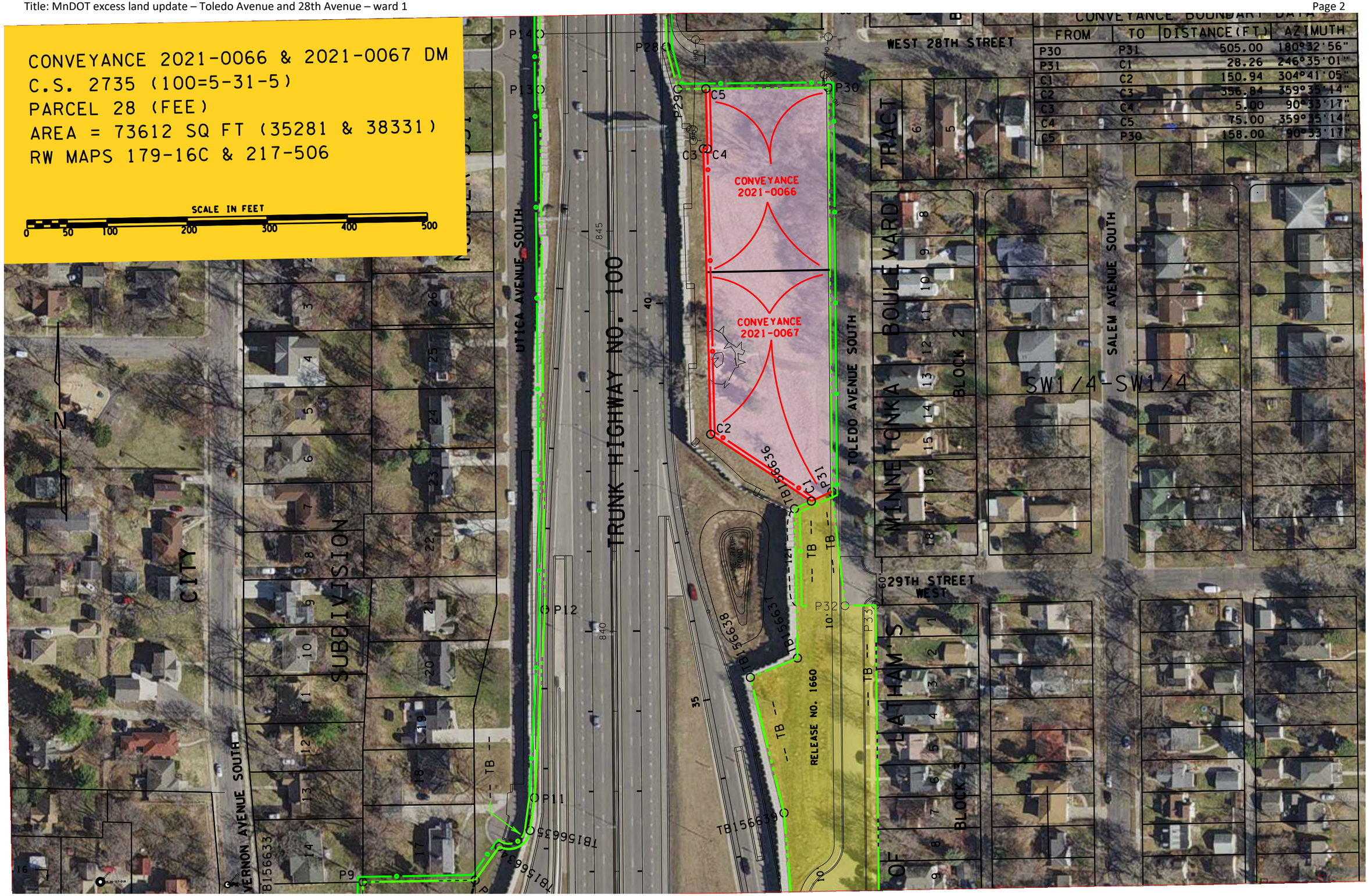
Financial or budget considerations: To be determined. The immediate cost includes staff time and legal fees related to the due diligence efforts, purchase price, and ongoing costs to maintain the parcel(s). This excludes any future use or improvements to the parcels.

Strategic priority consideration:

- St. Louis Park is committed to continue to lead in environmental stewardship.
- St. Louis Park is committed to providing a broad range of housing and neighborhood oriented development.

Supporting documents: Location map; links to the February 7, 2022 consent agenda report; November 22, 2021, study session report and minutes.

Prepared by: Sean Walther, planning manager/deputy CD director
Reviewed by: Karen Barton, community development director
Approved by: Kim Keller, city manager


CONVEYANCE 2021-0066 & 2021-0067 DM
C.S. 2735 (100=5-31-5)
PARCEL 28 (FEE)
AREA = 73612 SQ FT (35281 & 38331)
RW MAPS 179-16C & 217-506
SCALE IN FEET
0 50 100 200 300 400 500
CONVEYANCE BOUNDARY DATA
FROM TO DISTANCE(FT) AZIMUTH
P30 P31 505.00 180°32'56"
P31 C1 28.26 246°35'01"
C1 C2 150.94 304°41'05"
C2 C3 356.84 359°35'14"
C3 C4 5.00 90°33'17"
C4 C5 75.00 359°35'14"
C5 P30 158.00 90°33'17"
CONVEYANCE 2021-0066
CONVEYANCE 2021-0067
WEST 28TH STREET
UTICA AVENUE SOUTH
TRUNK HIGHWAY NO. 100
TOLEDO AVENUE SOUTH
SALEM AVENUE SOUTH
TRACT
BOULEVARD
BLOCK 2
SW1/4-SW1/4
CITY
SUBDIVISION
VERNON AVENUE SOUTH
29TH STREET WEST
RELEASE NO. 1660
BLOCK 3
OF LATHAM'S
P9
P10
P11
P12
P13
P14
P28(C)
P29
P30
P31
P32
P33
C1
C2
C3
C4
C5

Executive summary

Title: Title VI Plan framework

Recommended action: None at this time. This report is intended to provide an overview of the Title IV Plan requirements. A basic plan framework will be brought to the city council for approval on Dec. 19, 2022, to bring the city into compliance with Metropolitan Council and MnDOT Title VI requirements.

Policy consideration: Is the city council supportive of adopting a Title VI Plan to be in compliance with the 1964 Civil Rights Act federal requirements for non-transit providers?

Summary: Title VI of the 1964 Civil Rights Act protects people from discrimination based on race, color, and national origin in programs and activities receiving federal financial assistance.

The city receives federal financial assistance in a variety of ways. Recent examples include grants for capital projects such as the Dakota-Edgewood trail bridge, a grant for the Beltline park and ride, and American Rescue Plan Act (ARPA) funds. In addition, engineering has submitted several federal grant applications through the Infrastructure Investment and Jobs Act (IIJA) funds and Metropolitan Council.

A review of our existing plans, policies and processes showed that we are in line with Title VI requirements. While the city has been doing many of these processes informally, these need to be formally adopted to be compliant with MnDOT and Metropolitan Council's requirements. There are many formalities inherent to the federal requirements that need to be met to be compliant.

Additional information on both Title VI and the city's Plan are included in the discussion section of this report.

Financial or budget considerations: The city is receiving a $6.4 million federal Congestion Mitigation Air Quality (CMAQ) grant to construct the Beltline Station park and ride, and is required to adopt the Title VI Plan by Dec. 31, 2022. Additionally, the city periodically receives federal funding for various capital improvement projects.

Strategic priority consideration: St. Louis Park is committed to being a leader in racial equity and inclusion in order to create a more just and inclusive community for all.

Supporting documents: Discussion
Draft Title VI Plan

Prepared by: Deb Heiser, engineering director;
Jennifer Monson, redevelopment administrator
Reviewed by: Radious Guess, race equity and inclusion director
Approved by: Kim Keller, city manager

Discussion

Background

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. Several other federal legal authorities supplement Title VI by extending protections based on age, sex, disability, limited English proficiency, and low-income status. In addition, the Civil Rights Restoration Act of 1987 clarified Title VI enforcement by mandating that Title VI requirements apply to all programs and activities of federal-aid recipients regardless of whether any particular program or activity involves federal funds. Taken together, these laws require recipients and subrecipients of federal funds to ensure all programs and services are delivered to the public without discrimination.

The city receives federal financial assistance in a variety of ways. Recent examples include grants for capital projects such as the Dakota-Edgewood trail bridge, the Congestion Mitigation and Air Quality Improvement (CMAQ) grant for the Beltline park and ride, and American Rescue Plan Act (ARPA) funds. In addition, engineering has submitted several federal grant applications through the Infrastructure Investment and Jobs Act (IIJA) funds and Metropolitan Council.

As a subrecipient of federal funds (i.e. funds directed to MnDOT or the Metropolitan Council), we are required to demonstrate that all our programs and services are delivered to the public without discrimination, regardless of the funding source or the department that delivers it. A review of our existing plans, policies and processes showed that we are in line with Title VI requirements; however, there are many formalities inherent to the federal requirements that need to be met to be compliant. Over the past months, staff has been working on understanding the required documentation and bringing the Race Equity and Inclusion director up to speed on the programming.

In the interest of including the new leadership of the race equity department in the development of a plan and bringing the council up to speed, this topic was added to the Race Equity study session system, with the intent to develop a formal plan in 2023. Our goal is to operationalize the plan into the fabric of all departments in the city and to meet the requirements laid out by MnDOT and Metropolitan Council.

Present considerations

Metropolitan Council, the entity that distributes the funding for the CMAQ grant, recently notified community development that they require the city to formally adopt the provisions of Title VI through a council action by the end of 2022 to secure these funds. This requirement has escalated the timing of this report.

Due to the short timeframe, staff developed a basic Title VI Plan that complies with both MnDOT and Metropolitan Council's requirements. The document summarizes how the city currently operationalizes race equity and includes the formalities laid out by the federal government. Staff recommend that the council adopt the current plan while directing staff to continue development of the fuller, more robust version that it has been working toward.

The plan will serve as a reference for the city and an informational resource for the public. In addition to the required notices, this document incorporates existing city plans, policies and processes into a program that meets the basic requirements of Title VI. In addition, the Plan will be updated every three years.

Plan description

Staff has worked with Metropolitan Council staff to ensure the city's Title VI Plan meets federal subrecipient grant requirements. To do so, it has utilized a template created by the Minnesota Department of Transportation (MnDOT). Presented below is a summary of the various components of the document.

The federal government requires all communities receiving federal funding either directly or indirectly to adopt a Title VI Plan that includes the following items:

Purpose

The purpose of St. Louis Park's Title VI Plan is to ensure that no person, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity under the city.

Non-discrimination policy

The Title VI Plan applies to all operations of the city, including its contractors or anyone who works on behalf of the city, and includes a non-discrimination policy statement expressly stating that it is the city's policy that we will comply will federal and state statutes regarding non-discrimination.

Assurances

The program requires that the city include non-discrimination language in all bid solicitations, requests for proposals, contracts, and real estate agreements.

Organization, staffing, and structure and training

The city does not have any non-elected committees or commissions that make decisions regarding the use of federal funds, and the city's race equity and inclusion director will be assigned as the city's official Title VI Coordinator to ensure the city complies with the Title VI Plan and will ensure staff understand Title VI of the Civil Rights Act of 1964 and how it may apply to their work.

Complaint procedures

The Title VI Plan provides direction on how to file a formal Title VI complaint should any person or organization feel they have been discriminated against based on the basis of race, color, creed, religion, national origin, sex, marital status, disability, gender identity, sexual orientation, and status with regard to public assistance.

Complaints are submitted to the city's Title VI Coordinator and are forwarded to the MnDOT Office of Civil Rights, who then forwards the complaint to the Federal Highway Administration Headquarters Office of Civil Rights. The City of St. Louis Park is not responsible for investigating any complaints against itself.

Environmental justice

As part of the Title VI Plan, the city will formally make environmental justice part of its mission by identifying and addressing disproportionately high and adverse human health and environmental effects of the city's programs, policies, and activities on Black, Indigenous, and people of color (BIPOC)/ Asian Americans and Pacific Islanders (AAPI), and low-income populations.

The city supports environmental justice through every stage of the planning, construction, and maintenance processes, consistent with the factors outlined above. This ensures the city gains input from the community that will help shape how we build and maintain roads, bridges,

sidewalks, trails, parks, sanitary sewer, storm sewer, and water infrastructure. Some ways in which the city accomplishes this include:

- Ensuring the full and fair participation by all potentially affected communities in the transportation decision-making process;
- Avoiding, minimizing or mitigating disproportionately high and adverse human health and environmental effects, including social and economic effects, on BIPOC/AAPI populations and low-income populations;
- Providing timely information to area residents and businesses affected by transportation plans and projects;
- Performing periodic reviews of public involvement process to gauge effectiveness, making revisions as necessary; and
- Preventing the denial of, reduction in, or significant delay in the receipt of benefits by BIPOC/AAPI and low-income populations.

Public participation

The city places a high value on community engagement. Staff recognizes that effective community engagement builds trust, promotes understanding, and yields valuable feedback to guide our work. To guide public participation, St. Louis Park has a public engagement plan called "Engage!" along with a guide to ensure that our engagement is reviewed through an equity lens.

Limited english proficiency and language access

The city offers language assistant services through interpreters but is not required to translate documents into other languages, as the city's population with limited English proficiency (LEP) is less than 5%, and no language group has more than 1,000 people in it. However, the city has the following language services available:

- INGCO International provides language interpretation services for city staff to use in communicating with the public by phone or by videoconference on demand or in person if scheduled in advance. The city also uses INGCO's translation services for written materials.
- The city website has a "Translate" button offering more than 50 languages.
- Emails delivered through the city's notification service, GovDelivery, have translate buttons for Spanish, Somali, Russian and Amharic.

Notice of rights

Information regarding the city's commitment against discrimination will be posted in all buildings where public meetings are held and on the city's website. The notice provides contact information for the city's race equity and inclusion director and how to file an official complaint if someone believes they have been discriminated against.

Next steps

City council will be asked to formally adopt the Title VI Plan on Dec. 19, 2022. The city is receiving a $6.4 million federal Congestion Mitigation Air Quality (CMAQ) grant to construct the Beltline Station park and ride, and the Metropolitan Council is requiring us to adopt the Title VI Plan by Dec. 31, 2022. The Plan meets the basic requirements of Metropolitan Council and MnDOT.

City staff will continue the work of ensuring the Plan is inclusive of all city work and operationalizing program activities into the fabric of all departments.

Title VI Plan for MnDOT FHWA Subrecipient

CITY OF ST. LOUIS PARK

_____
(Date)

Prepared by: _____
(Name and Job Title)

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Title VI Plan Revision Log

Date Month/day/ year	**Section Revised**	**Summary of Revisions**
Date	Plan established and approved	

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I. Introduction

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. Several other federal legal authorities supplement Title VI by extending protections based on age, sex, disability, limited English proficiency, and low-income status. In addition, the Civil Rights Restoration Act of 1987 clarified Title VI enforcement by mandating that Title VI requirements apply to *all* programs and activities of federal-aid recipients regardless of whether any particular program or activity involves federal funds. Taken together, these laws require recipients and subrecipients of federal funds to ensure all programs and services are delivered to the public without discrimination.

CITY OF ST. LOUIS PARK, as a recipient of federal financial assistance, will ensure full compliance with Title VI of the Civil Rights Act of 1964; 49 C.F.R. Part 21 (Department of Transportation Regulations for the Implementation of Title VI of the Civil Rights Act of 1964); and related statutes and regulations. CITY OF ST. LOUIS PARK acknowledges it is subject to and will comply with Federal Highway Administration Title VI Assurances.

This plan explains the how CITY OF ST. LOUIS PARK incorporates the requirements of Title VI and related legal authorities into its operations. The plan will be used a reference for the CITY OF ST. LOUIS PARK and an informational resource for the public. The plan will be updated every 3 years to reflect changes in Title VI compliance operations.

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II. Legal Authorities

CITY OF ST. LOUIS PARK Title VI compliance program is governed by many legal authorities, including, but not limited to, the list below.

Legal Authority	Summary
Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d *et seq.*	Prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.
Federal-Aid Highway Act of 1973, 23 U.S.C. § 324.	Prohibits discrimination on the basis of sex in programs and activities receiving federal financial assistance.
Age Discrimination Act of 1975, 42 U.S.C. § 6101 *et seq.*	Prohibits discrimination on the basis of age in programs and activities receiving federal financial assistance.
Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794.	Prohibits discrimination on the basis of disability in programs and activities receiving federal financial assistance.
Uniform Relocation Act of 1970, 42 U.S.C. § 4601 *et seq.*	Requires fair treatment of persons displaced by federal-aid programs and projects.
Environmental Justice Executive Order (Exec. Order No. 12898, 59 Fed. Reg. 7629 (Feb. 11, 1994).)	Requires federal agencies and federal-aid recipients to identify and address "disproportionately high and adverse human health or environmental effects of its programs, policies and activities on minority populations and low-income populations."
Limited English Proficiency Executive Order (Exec. Order No. 13166, 65 Fed. Reg. 50121 (Aug. 11, 2000).)	Recipients of federal financial assistance must provide meaningful access to limited English proficiency (LEP) applicants and beneficiaries.
49 C.F.R. Part 21	Non-discrimination in Federally-Assisted Programs of the Department of Transportation.
23 C.F.R. Part 200	Title VI Program and Related Statutes - Implementation and Review Procedures.

III. Title VI and Non-Discrimination Policy Statement

It is the policy of CITY OF ST. LOUIS PARK that no person shall on the grounds of race, color, national origin, sex, disability, or age, be excluded from participation in, be denied the benefits of, or be subjected to discrimination in any operation of CITY OF ST. LOUIS PARK as provided by Title VI of the Civil Rights Act of 1964 and related statutes.

In addition, Executive Order No. 12898, 59 Fed. Reg. 7629 (Feb. 11, 1994) requires CITY OF ST. LOUIS PARK to ensure fair treatment and meaningful involvement of low-income populations in all programs and activities, and Executive Order No. 13166, 65 Fed. Reg. 50121 (Aug. 11, 2000) requires agency programs to incorporate access for people with limited English proficiency.

This policy applies to all operations of CITY OF ST. LOUIS PARK, including its contractors and anyone who acts on behalf of CITY OF ST. LOUIS PARK. This policy also applies to the operations of any department or agency to which CITY OF ST. LOUIS PARK extends federal financial assistance. Federal financial assistance includes grants, training, use of equipment, donations of surplus property, and other assistance.

The Minnesota Human Rights Act prohibits discrimination in the provision of public services on the basis of race, color, creed, religion, national origin, sex, marital status, disability, gender identity, sexual orientation, and status with regard to public assistance. Public services are defined to include any department or agency managed by any city or county in Minnesota.

Prohibited discrimination may be intentional or unintentional. Seemingly neutral acts that have disparate impacts on individuals of a protected group and lack a substantial legitimate justification are a form of prohibited discrimination. Harassment and retaliation are also prohibited forms of discrimination.

Examples of prohibited types of discrimination based on race, color, national origin, sex, disability, or age include: Denial to an individual any service, financial aid, or other benefit; Distinctions in the quality, quantity, or manner in which a benefit is provided; Segregation or separate treatment; Restriction in the enjoyment of any advantages, privileges, or other benefits provided; and Discrimination in any activities related to highway and infrastructure or facility built or repaired.

Title VI compliance is a condition of receipt of federal funds. The Title VI Coordinator is authorized to ensure compliance with this policy, Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d *et seq.* and related statutes, and the requirements of 23 C.F.R. Part 200 and 49 C.F.R. Part 21.

_____ _____

Kim Keller, city manager Date

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IV. Title VI Assurances

The U.S. DOT requires that federal financial assistance be provided on the condition that the recipient provides an assurance that its programs and activities will be conducted in compliance with Title VI of the Civil Rights Act of 1964. The requirement is located at 49 CFR 21.7(a). To support the implementation of this requirement, the U.S. DOT provided an assurances agreement in U.S. DOT Order 1050.2A that federal fund recipients and subrecipients must sign as a condition of receiving federal financial assistance.

The assurances agreement provides specific non-discrimination language CITY OF ST. LOUIS PARK is required to include in bid solicitations or requests for proposals, contracts, and real estate agreements. CITY OF ST. LOUIS PARK is committed to ensuring the necessary language is used as prescribed in the assurances agreement.

In accordance with this requirement, CITY OF ST. LOUIS PARK has signed the U.S. DOT Standard Title VI/Non-Discrimination Assurances. The document is attached as **Appendix A**.

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V. Organization, Staffing, and Structure

CITY OF ST. LOUIS PARK does not have any non-elected committees or commissions that make decisions regarding the use of federal funds.

The city manager is ultimately responsible for assuring full compliance with the provisions of Title VI of the Civil Rights Act of 1964 and related statutes and has directed that non-discrimination is required of all agency employees, contractors, and agents pursuant to 23 C.F.R. Part 200 and 49 C.F.R. Part 21.

CITY OF ST. LOUIS PARK has assigned Radious Guess, race equity and inclusion director, to perform the duties of the Title VI Coordinator and ensure implementation of the agency's Title VI program. The position of race equity and inclusion director is located within the race equity and inclusion department; this position reports to the city manager.

The Title VI Coordinator is responsible for the following:

- Maintaining and updating the Title VI plan on the agency's behalf;
- Ensuring relevant agency staff receive necessary Title VI training;
- Ensuring prompt processing of Title VI complaints and referral to Minnesota Department of Transportation;
- Developing procedures for the collection and analysis of statistical data;
- Developing a program to conduct Title VI reviews of program areas; and
- Developing Title VI information for dissemination internally and externally;

An organizational chart will be attached as a supplement to this description with the Title VI Coordinator listed.

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VI. Training

CITY OF ST. LOUIS PARK will ensure that its staff understand Title VI of the Civil Rights Act of 1964 and how it may apply to their work. The following options are available for providing training:

- Review of CITY OF ST. LOUIS PARK Title VI Plan.
- Attendance at any available Title VI trainings provided by the Minnesota Department of Transportation, U.S. Department of Transportation or its applicable operating administrations, or the U.S. Department of Justice.
- Viewing the video Understanding and Abiding by Title VI of the Civil Rights Act of 1964 produced by the U.S. Department of Justice.

CITY OF ST. LOUIS PARK will maintain records indicating that staff have received sufficient training on a periodic basis.

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VII. Primary Program Area Descriptions & Review Procedures

CITY OF ST. LOUIS PARK engages in the following program areas:

Program Area	General Description	Title VI/Non-Discrimination Concerns and Responsibilities	Review Procedures for Ensuring Non-Discrimination
Right of Way	Issues public right of way permits for construction, transportation, business, and other activities. Coordinates relocation of citizens whose property has been acquired for a right of way.	Public right of way permits and relocations should not create unfair burdens for environmental justice communities. Collecting demographic data from property owners who may be subject to right of way activities. Ensuring property owners impacted by right of way activities are made aware of their right to be free from discrimination on the basis of race, color, or national origin under Title IV of the Civil Rights Act of 1964.	Reviewing permits and relocations to ensure non-discrimination. Ensure demographic data is part of necessary right of way templates or forms. Ensure Title IV notice is consistently provided to property owners impacted by right of way activities.

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Program Area	General Description	Title VI/Non-Discrimination Concerns and Responsibilities	Review Procedures for Ensuring Non-Discrimination
Contracting	Develops and manages contracts and contracting opportunities, including specifications, bidding process, and contract execution.	Maintaining an open and fair bidding process for all contracts. Ensure Title VI Assurances appendices are included in contracts as specified within the assurances document.	Reviewing contracts for necessary Title VI language. Reviewing any available data on contract recipients to ensure non-discrimination in contracting. Reviewing bidding procedures to ensure non-discrimination and equal opportunity.
Planning	Short-term and long-term planning of transportation projects	Using equity-based analysis as part of planning process. Ensuring comprehensive public participation to meet environmental justice requirements. Collecting demographic data from public engagement activities regarding demographics of public participants. Providing language access as needed.	Review planning decisions through equity lens to ensure non-discrimination. Reviewing public engagement activities periodically to determine whether engagement opportunities were offered to all communities. Documenting language access requests.

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Program Area	General Description	Title VI/Non-Discrimination Concerns and Responsibilities	Review Procedures for Ensuring Non-Discrimination
Public Engagement	Coordinates public engagement activities for planning and project development, as well as relationship-building engagement activities.	Comprehensive public participation to meet environmental justice requirements. Collect demographic data from public engagement activities regarding participants. Providing language access as needed. Sharing Title VI information to the public to ensure awareness of their rights to be free from discrimination.	Reviewing public engagement activities periodically to determine whether engagement opportunities were offered to all communities. Reviewing public engagement activities periodically to determine whether engagement opportunities were offered to all communities. Documenting language access requests.
Maintenance	Roadway and right of way services, including, but not limited to: • Repair • Signage • Drainage • Snow and ice removal	Ensuring no communities are subject to a disparate lack of maintenance services based on a protected class.	Reviewing resources provided to the community and determining whether any protected class communities have disproportionately benefited or been harmed by the delivery of maintenance services.

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VIII. Data Collection

Program Area	Type of Data Collected & Process for Collecting	Intended Outcome of Data Analysis (i.e., Title VI Purpose for Collecting the Data)
Right of Way	Collecting demographic data from property owners who may be subject to right of way activities by including inputs for demographic data on the field title report form.	Ensuring right of way activities do not disproportionately affect individuals or groups based on a protected class status.
Contracting	Identifying contractors who are a: • Disadvantaged Business Enterprise (DBE) by the Minnesota Unified Certification Program • Targeted Group Business (TGB) by the Minnesota Department of Administration • Veteran-Owned/Service-Disabled Business by the United States Department of Veterans Affairs	Ensuring equal opportunity in contracting to all individuals and groups.
Planning	Reviewing data from the U.S. Census Bureau and other credible sources to determine demographic makeup of the local community.	Ensuring project impacts do not disproportionately impact any individuals or groups based on a protected class status.
Public Engagement	Reviewing data from the U.S. Census Bureau and other credible sources to determine demographic makeup of the local community. Providing demographic questionnaires to public engagement participants and including demographic questions in public surveys.	Ensuring communications and interactions with the public sufficiently reach all local demographics.

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Maintenance	Reviewing maintenance activities by geography and demographic makeup of communities receiving the maintenance services	Ensuring no communities are subject to a disparate lack of maintenance services based on a protected class.

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IX. Title VI Complaint Procedures

Scope of Title VI Complaints

No person or groups of persons shall, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any and all programs, services, or activities administered by CITY OF ST. LOUIS PARK, and its contractors on the grounds of **race, color, national origin, sex, age, disability, or low-income status.**

In addition, the Minnesota Human Rights Act prohibits discrimination in the provision of public services on the basis of race, color, creed, religion, national origin, sex, marital status, disability, gender identity, sexual orientation, and status with regard to public assistance.

The scope of Title VI covers all internal and external activities of CITY OF ST. LOUIS PARK.

The following types of actions are prohibited under Title VI protections (See 49 C.F.R. 21.5):

- Excluding individuals or groups from participation in programs or activities
- Denying program services or benefits to individuals or groups
- Providing a different service or benefit or providing them in a manner different from what is provided to others
- Denying an opportunity to participate as a member of a planning, advisory or similar body that is an integral part of the program
- Retaliation for making a complaint or otherwise participating in any manner in an investigation or proceeding related to Title VI of the Civil Rights Act of 1964

The complaint procedure below is available from the Minnesota Department of Transportation (MnDOT) in Spanish, Somali, and Hmong.

How to File a Formal Title VI Complaint

Any person(s) or organization(s) believing they have been discriminated against on the basis of the protected classes stated above by CITY OF ST. LOUIS PARK or its contractors may file a Title VI complaint.

Discrimination complaints **must be received no more than 180 days after the alleged incident** unless the time for filing is extended by the processing agency.

Complaints should be in writing and signed and may be filed by mail, fax, in-person, or email. A complaint should contain the following information:

- A written explanation of the alleged discriminatory actions;
- The complainant's contact information, including, if available: full name, postal address, phone number, and email address;
- The basis of the complaint (e.g., race, color, national origin, etc.);

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- The names of specific persons and respondents (e.g., agencies/organizations) alleged to have discriminated;
- Sufficient information to understand the facts that led the complainant to believe that discrimination occurred in a program or activity that receives Federal financial assistance; and
- The date(s) of the alleged discriminatory act(s) and whether the alleged discrimination is ongoing.

Complainants are encouraged to submit complaints directly to Minnesota Department of Transportation (MnDOT) via its online complaint form available here: https://www.dot.state.mn.us/civilrights/nondiscrimination-complaint-form.html.

Complaints can also be filed by completing and submitting CITY OF ST. LOUIS PARK's Title VI Complaint Form available at Appendix B or by sending an email or letter with the necessary information to:

City of St. Louis Park
Attn. Title VI Coordinator
5005 Minnetonka Boulevard
St. Louis Park, MN 55416
Phone: 952.924.2602
Email: rguess@stlouispark.org

The complaint form is also available in hard copy at 5005 Minnetonka Boulevard, St. Louis Park, MN 55416. Language assistance is available for limited English proficient individuals. MnDOT has hard copy complaint forms available in Spanish, Somali, and Hmong. Other languages can be accommodated as needed.

If necessary, the complainant may use the phone number above and provide the allegations by telephone. The Title VI Coordinator will transcribe the allegations of the complaint as provided over the telephone and send a written complaint to the complainant for correction and signature.

Complaints can also be filed directly with the following agencies:

Federal Highway Administration
U.S. Department of Transportation Office of Civil Rights
1200 New Jersey Avenue, SE
8th Floor E81-105
Washington, DC 20590
Email: CivilRights.FHWA@dot.gov

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Fax: 202.366.1599
Phone: 202.366.0693

Minnesota Department of Transportation
Office of Civil Rights
385 John Ireland Boulevard, Mail Stop 170
St. Paul, MN 55105
Online: Complaint Form
Fax: 651.366.3129
Phone: 651.366.3073

After submitting a complaint, the complainant will receive a correspondence informing them of the status of the complaint within ten (10) business days of CITY OF ST. LOUIS PARK or other agency receiving the complaint.

Complaints received by CITY OF ST. LOUIS PARK's Title VI Coordinator are forwarded to the MnDOT Office of Civil Rights (OCR). MnDOT OCR will forward the complaint to the FHWA Minnesota Division Office, along with a preliminary processing recommendation. The FHWA Minnesota Division Office will forward the complaint to FHWA Headquarters Office of Civil Rights (HCR).

FHWA HCR is responsible for all determinations regarding whether to accept, dismiss, or transfer Title VI complaints. There are four potential outcomes for processing complaints:

- **Accept**: if a complaint is timely filed, contains sufficient information to support a claim under Title VI, and concerns matters under the FHWA's jurisdiction, then HCR will send to the complainant, the respondent agency, and the FHWA Minnesota Division Office a written notice that it has accepted the complaint for investigation.
- **Preliminary review:** if it is unclear whether the complaint allegations are sufficient to support a claim under Title VI, then HCR may (1) dismiss it or (2) engage in a preliminary review to acquire additional information from the complainant and/or respondent before deciding whether to accept, dismiss, or refer the complaint.
- **Procedural Dismissal:** if a complaint is not timely filed, is not in writing and signed, or features other procedural/practical defects, then HCR will send the complainant, respondent, and FHWA Minnesota Division Office a written notice that it is dismissing the complaint.
- **Referral/Dismissal:** if the complaint is procedurally sufficient, but FHWA (1) lacks jurisdiction over the subject matter or (2) lacks jurisdiction over the respondent entity, then HCR will either dismiss the complaint or refer it to another agency that does have

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jurisdiction. If HCR dismisses the complaint, it will send the complainant, respondent, and FHWA Division Office a copy of the written dismissal notice. For referrals, FHWA will send a written referral notice with a copy of the complaint to the proper Federal agency and a copy to the USDOT Departmental Office of Civil Rights.

Complaints are not investigated by CITY OF ST. LOUIS PARK. FHWA HCR is responsible for investigating all complaints. FHWA HCR may also delegate the investigation to MnDOT OCR, who would then conduct all data requests, interviews, and analysis and create a Report of Investigation (ROI). MnDOT OCR will have sixty (60) business days from the date the investigation is delegated to prepare the ROI and send it to HCR. HCR will review the ROI and compose a Letter of Finding based on the ROI.

For further information about the FHWA investigation process and potential complaint outcomes, please visit the Questions and Answers for Complaints Alleging Violations of Title VI of the Civil Rights Act of 1964.

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X. Environmental Justice

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires federal agencies to make achieving environmental justice a part of its mission by identifying and addressing disproportionately high and adverse human health and environmental effects of their programs, policies, and activities on minority and low-income populations. The requirements are to be carried out to the greatest extent practicable and permitted by law.

In May 2012, USDOT issued an update to DOT Order 5610.2(a), DOT Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, which was originally published in April 1997. The revised Order continues to be a key component of DOT's environmental justice strategy. It updates and clarifies certain aspects of the original Order while maintaining its general framework and procedures and DOT's commitment to promote the principles of environmental justice in all DOT programs, policies, and activities.

Similarly, CITY OF ST. LOUIS PARK will institutionalize the same key components of DOT's environmental justice strategy and commitment to promote the principles of environmental justice in all CITY OF ST. LOUIS PARK's programs, policies, and activities. These policies outline actions and factors to address environmental justice in order to identify and avoid discrimination and disproportionality high and adverse effects on minority and low-income populations:

1. Identify and evaluate environmental, public health, and interrelated social and economic effects of CITY OF ST. LOUIS PARK programs, policies, and activities;
2. Propose measures to avoid, minimize, and/or mitigate disproportionately high and adverse environmental and public health effects and interrelated social and economic effects, and provide offsetting benefits and opportunities to enhance communities, neighborhoods, and individuals affected by CITY OF ST. LOUIS PARK programs, policies, and activities, where permitted by law and consistent with Executive Order 12898;
3. Consider alternatives to proposed programs, policies, and activities where such alternatives would result in avoiding and/or minimizing disproportionately high and adverse human health or environmental impacts, consistent with Executive Order 12898; and
4. Elicit public involvement opportunities and consider the results thereof, including soliciting input from affected minority populations and low-income populations in considering alternatives.

CITY OF ST. LOUIS PARK supports environmental justice through every stage of the planning, construction, and maintenance processes, consistent with the factors outlined above. This ensures CITY OF ST. LOUIS PARK gains input from the community that will help shape how CITY OF ST. LOUIS PARK builds and maintains roads, bridges, sidewalks, trails, parks, sanitary sewer, storm sewer, and water infrastructure.

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Some ways in which the CITY OF ST. LOUIS PARK accomplishes this include:

- Ensuring the full and fair participation by all potentially affected communities in the transportation decision-making process;
- Avoiding, minimizing or mitigating disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations;
- Providing timely information to area residents and businesses affected by transportation plans and projects;
- Performing periodic reviews of public involvement process to gauge effectiveness, making revisions as necessary; and
- Preventing the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

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XI. Public Participation

CITY OF ST. LOUIS PARK places a high value on community engagement. We recognize that effective community engagement builds trust, promotes understanding, and yields valuable feedback to guide our work. To guide public participation, CITY OF ST. LOUIS PARK has a public engagement plan called "Engage!" along with a guide to ensure that our engagement is reviewed through an equity lens. Attached are these plans.

When planning or developing city activities, programs, projects, policies, initiatives, service delivery or budgets, the work is reviewed through an equity lens. For each public process, the city will review data from the U.S. Census Bureau and other credible sources to determine the demographic makeup of the local community served. Following are six actions to advance more racially equitable outcomes.

- Ensure that the city's actions and decisions are geared towards racially equitable outcomes.
- Help staff understand the root causes of existing inequities within the city, engage people of color in decision-making and take actions that can improve inequities.
- Collect and analyze data to identify existing racial disparities and consequences.
- Identify workable, sustainable strategies to promote racial equity within CITY OF ST. LOUIS PARK.
- Monitor and measure progress on racial equity and provide feedback.

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XII. Limited English Proficiency (LEP) & Language Access

DOT Guidance: "There should be an assessment of the number or proportion of LEP individuals eligible to be served or encountered and the frequency of encounters pursuant to the first two factors in the four-factor analysis."

CITY OF ST. LOUIS PARK has addressed the federal requirements for assessing needs and providing services to LEP populations. The LEP needs assessment was conducted based on the Four-Factor Analysis, as outlined in the Department of Justice's publication 65 FR 50123. This analysis includes the following:

1. Identifying the number or proportion of LEP persons served or encountered in CITY OF ST. LOUIS PARK;
2. Determining the frequency with which LEP individuals come into contact with CITY OF ST. LOUIS PARK's services;
3. Determining the nature and importance of the program, activity or services to LEP people in CITY OF ST. LOUIS PARK; and
4. Assessing the current resources available to provide language assistance services

The city completed the Four-Factor Analysis. ACS data indicate that CITY OF ST. LOUIS PARK's total population is 49,158. A review of the population in CITY OF ST. LOUIS PARK revealed that LEP individuals make up 5% or less of the eligible population or beneficiaries and no language group was more than 1,000 in number. Due to this, CITY OF ST. LOUIS PARK will not proactively translate all documents into other languages. To ensure flexibility of services LEP persons receive, language assistance services will be provided, including interpreters and document translations. Details about the analysis are described in the sections below.

Legal Background

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," reprinted at 65 FR 50121, August 16, 2000, directs each Federal agency to examine the services it provides and to develop and implement a system by which LEP individuals can meaningfully access those services. Federal agencies were instructed to publish guidance to assist states and local governments who receive federal funds with their obligations to LEP individuals under Title VI. The Executive Order states that federal fund recipients, like CITY OF ST. LOUIS PARK, must take reasonable steps to ensure meaningful access to their programs and activities for LEP individuals.

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Section 601 of Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, provides that no person shall "on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." Courts have interpreted Title VI's prohibition of discrimination on the basis of national origin to include discrimination based on English proficiency. Under Title VI, recipients of federal financial assistance are required to provide LEP individuals with meaningful access to their programs and services.

The U.S. Department of Transportation (DOT) published revised guidance for its recipients on December 14, 2005. This document states that Title VI and its implementing regulations require that U.S. DOT recipients take reasonable steps to ensure meaningful access to the benefits, services, information, and other important portions of their programs and activities for LEP individuals. Recipients use the DOT LEP Guidance to determine how best to comply with statutory and regulatory LEP obligations.

Identifying Limited English Proficient Populations (Four-Factor Analysis)
Title VI and its regulations require CITY OF ST. LOUIS PARK to take reasonable steps to ensure meaningful access to its information and services. What constitutes reasonable steps to ensure meaningful access is flexible, fact-dependent, and contingent on a four-factor analysis established by the U.S. Department of Justice. The four-factor analysis is an individualized assessment that should be applied to determine what reasonable steps must be taken to ensure meaningful access for LEP individuals. **The analysis below is updated at least once every five years.**

FACTOR #1: THE NUMBER OR PROPORTION OF LEP INDIVIDUALS ELIGIBLE TO BE SERVED OR LIKELY TO BE ENCOUNTERED
The greater the number or proportion of LEP individuals from a particular language group served or encountered in the eligible service population, the more likely language assistance services are necessary. Ordinarily, "individuals eligible to be served or likely to be encountered" by a program or activity are those who are in fact, served or encountered in the eligible service population. This population will be program-specific and includes people who are in the program's geographic area.

CITY OF ST. LOUIS PARK should first examine their prior experiences with LEP individuals and determine the breadth and scope of language assistance services needed. It is also important to include LEP populations that are eligible beneficiaries of programs, activities, or services but may be underserved because of existing language barriers.

Generally, CITY OF ST. LOUIS PARK will use reliable external data sources to determine the number or proportion of LEP individuals likely to be served or encountered.

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CITY OF ST. LOUIS PARK relies on MnDOT's LEP Data Tool to provide the necessary data. **In the most recent analysis conducted in July 2022, the findings on the next two pages were documented.**

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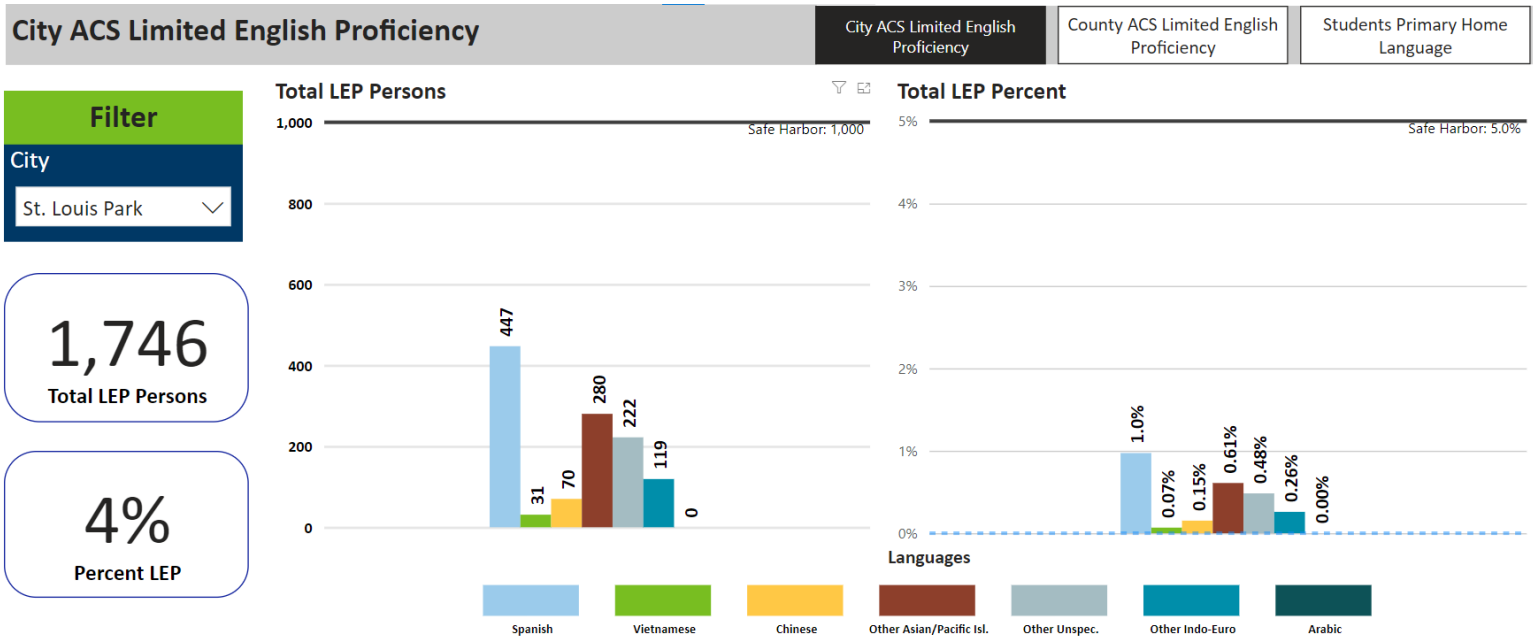
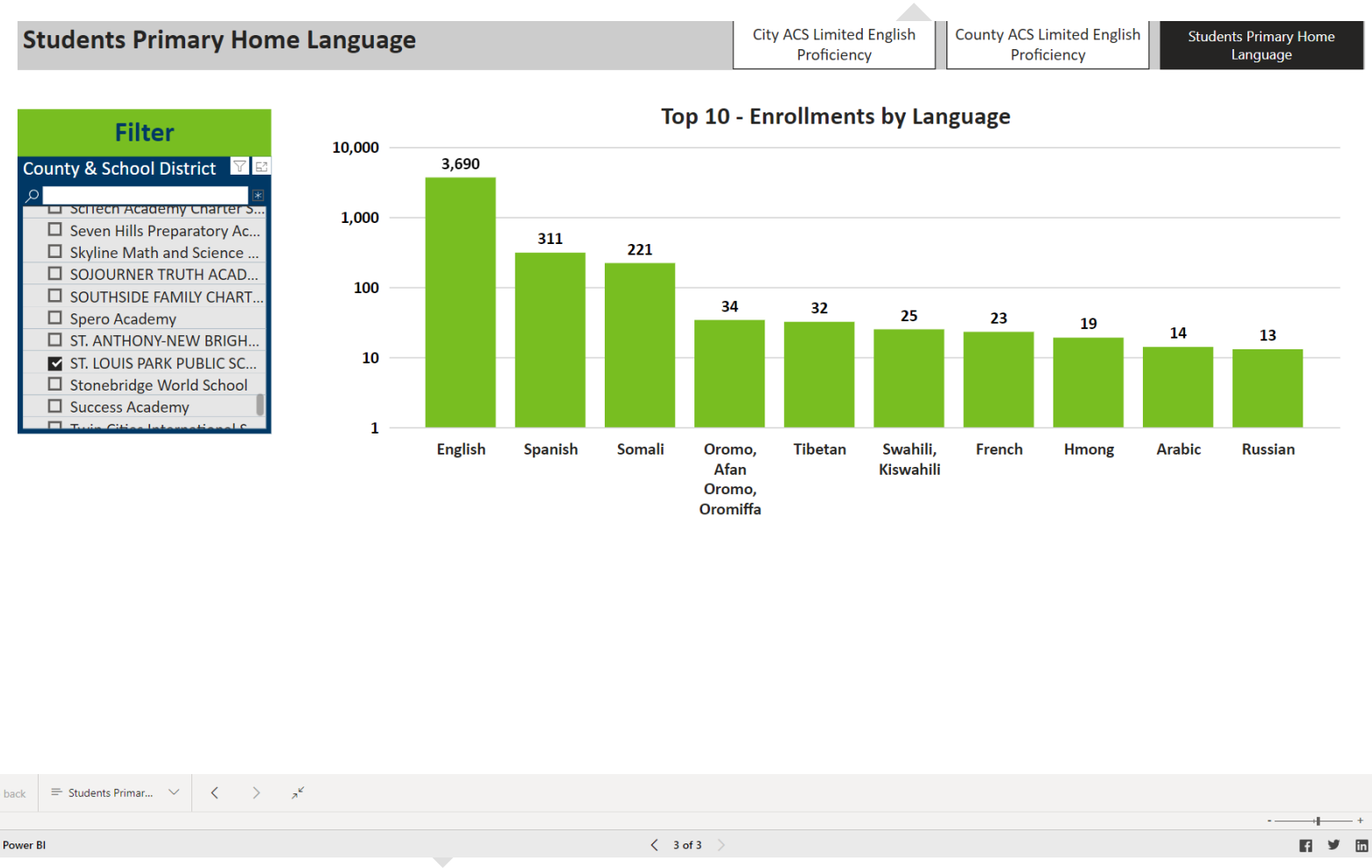
American Community Survey (5-Year Estimate 2015-2019, Table ID C16001)



City	Spanish #	Spanish %	Vietnamese #	Vietnamese %	Chinese #	Chinese %	Other Asian/Pacific Isl. #	Other Asian/Pacific Isl. %	Other Unspec. #	Other Unspec. %	Other Indo-Euro #	Other Indo-Euro %	Arabic #	Arabic %	Korean #	Korean %	Fre Hai Caj
St. Louis Park	447	1.0%	31	0.07%	70	0.15%	280	0.61%	222	0.48%	119	0.26%	0	0.00%	0	0.00%	

Minnesota Department of Education: Primary Home Language for Students



Safe Harbor Provision (Written Documents)

U.S. DOT LEP Guidance provides a "safe harbor" to help ensure greater clarity regarding whether CITY OF ST. LOUIS PARK is meeting its obligation to provide written translations. These safe harbor provisions only apply to the translation of written documents and do not affect the requirement to provide meaningful access to LEP individuals through competent oral interpreters where oral language assistance services are needed and reasonable.

The following actions are considered strong evidence of compliance with the Department's written-translation obligations:

(a) Providing written translations of vital documents for **each eligible LEP language group that constitutes 5% or 1,000 people** of the population of individuals eligible to be served or likely to be affected or encountered. Translation of non-vital documents, if needed, can be provided orally; or

(b) If there are fewer than 50 individuals in a language group that reaches the 5% trigger in (a), the vital written materials are not translated, but written notice of the right to receive free, competent oral interpretation of those vital written materials in the primary language of the LEP language group of is provided.

The above findings from the graphs on the preceding pages did not indicate any LEP language groups meet the safe harbor threshold. Therefore, CITY OF ST. LOUIS PARK will not proactively translate written documents at this time. However, efforts will be made to reasonably accommodate any language access requests that arise.

FACTOR #2: THE FREQUENCY WITH WHICH LEP INDIVIDUALS COME IN CONTACT WITH THE PROGRAM, ACTIVITY, OR SERVICE

CITY OF ST. LOUIS PARK should assess, as accurately as possible, the frequency with which they have or should have contact with LEP individuals from different language groups seeking assistance. If LEP individuals access a program or service on a regular, consistent basis, then that program or service provider has greater language access duties than a program or service whose contact with LEP individuals is unpredictable or infrequent.

However, even if there are infrequent or unpredictable interactions with LEP individuals, CITY OF ST. LOUIS PARK must be prepared to provide language assistance services to LEP individuals.

In applying this factor CITY OF ST. LOUIS PARK should also consider whether outreach to LEP individuals could increase the frequency of contact with LEP language groups and remain mindful of the data analysis conducted under Factor #1 to identify the proportion of LEP population present in the service area.

LEP persons may interact in several ways with CITY OF ST. LOUIS PARK, including but not limited to:

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- Public meetings
- Community events
- Project-specific meetings, events, and discussions
- Online engagement
- Walk-in requests for information
- Phone communications
- Customer service interactions
- Surveys for information
- Requests for permits, licenses, or materials
- Real estate transactions (i.e., right of way)

CITY OF ST. LOUIS PARK will assess, as accurately as possible over the next 5-year period, the frequency with which LEP persons from different language groups come into contact with CITY OF ST. LOUIS PARK programs and activities.

FACTOR #3: THE NATURE AND IMPORTANCE OF THE PROGRAM, ACTIVITY, OR SERVICE TO PEOPLE'S LIVES

The more important the activity, information, service, or program, or the greater the possible consequences of the contact to the LEP individuals, the greater the need for language assistance services. CITY OF ST. LOUIS PARK must determine whether denial or delay of access to services or information could have serious implications for the LEP individual. Generally, programs providing information and services related to accessing benefits, opportunities, or rights are considered high importance.

Vital Documents

As part of its analysis, a district, office, or program may determine that necessary language assistance measures include the translation of vital documents into the language of each LEP group that is frequently encountered, eligible to be served, or likely to be affected. Vital documents are paper or electronic written material containing information that is (1) critical for accessing programs, services, benefits, or activities, (2) directly and substantially related to public safety, or (3) required by law. Whether a document (or the information it solicits) is "vital" may depend upon the importance of the program, information, encounter, or service involved, and the consequence to the LEP person if the information in question is neither accurate nor timely.

Examples of vital documents in the U.S. DOT LEP Guidance include:

- Emergency transportation information
- Notices of public hearings regarding proposed transportation plans or projects
- Notices advising LEP individuals of free language assistance

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- Applications or instructions on how to participate in a program or activity or receive benefits or services
- Consent forms

Because no languages were identified as meeting the safe harbor threshold for translating vital written materials, CITY OF ST. LOUIS PARK is not at this time providing a list of documents considered vital. Should future analysis indicate an LEP group meeting the safe harbor threshold, CITY OF ST. LOUIS PARK will evaluate its vital documents and provide translations in accordance with the analysis and federal guidance.

FACTOR #4: **THE RESOURCES AVAILABLE TO CITY OF ST. LOUIS PARK AND THE COST OF LANGUAGE ASSISTANCE**

The resources available to CITY OF ST. LOUIS PARK and the costs of providing language assistance services may impact the steps taken to provide meaningful access to LEP individuals. Additionally, reasonable steps may cease to be reasonable where the costs imposed substantially exceed the benefits. CITY OF ST. LOUIS PARK will determine on a case-by-case basis whether language assistance costs outweigh the benefits.

The four-factor analysis necessarily implicates a spectrum of language assistance measures. For instance, written translations can range from translation of an entire document to translation of a short description of the document, and interpretation services may range from using telephone-based interpretation services to providing in-person interpretation at a public event. Language assistance measures should be based on what is necessary and reasonable after considering the four-factor analysis. CITY OF ST. LOUIS PARK will proactively identify how to provide language assistance services efficiently and cost-effectively while ensuring meaningful access to LEP individuals.

Language Services

There are two types of language services:

- *Translation* is the replacement of a word, phrase, or text in one language (source language) with an equivalent-meaning word, phrase, or text in another language (target language). This is written language assistance.
- *Interpretation* is the act of listening to a communication in one language (source language) and orally converting it to another language (target language) while retaining the same meaning. This is oral language assistance.

Currently, CITY OF ST. LOUIS PARK has the following language services available:

- INGCO International provides language interpretation services for city staff to use in communicating with the public by phone or by videoconference on demand, or in

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person if scheduled in advance. The city also uses INGCO's translation services for written materials.

- CITY OF ST. LOUIS PARK website has a "Translate" button offering more than 50 languages.
- Emails delivered through the city's notification service, GovDelivery, have translate buttons for Spanish, Somali, Russian and Amharic.

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XIII. Notice of Rights

The following notice is posted in all buildings where public meetings are held and on the city's webpage.

Your Rights Against Discrimination under Title VI of the Civil Rights Act of 1964

CITY OF ST. LOUIS PARK is committed to ensuring that no person is excluded from participation in, denied the benefits of, or otherwise subjected to discrimination on the basis of race, color, national origin, sex, age, disability, limited English proficiency or low-income status in any and all programs, activities, or services administered by the city in accordance with Title VI of the Civil Rights Act of 1964 and related non-discrimination legal authorities.

In addition, the Minnesota Human Rights Act prohibits discrimination in the provision of public services on the basis of race, color, creed, religion, national origin, sex, marital status, disability, gender identity, sexual orientation, and status with regard to public assistance.

If you believe you have been aggrieved by an unlawful discriminatory practice, or wish to request more information about the department's obligations under Title VI, please contact us at the following address and telephone number:

Radious Guess
Race equity and inclusion director
City of St. Louis Park, city hall
5005 Minnetonka Boulevard
St. Louis Park, MN 55416
Phone: 952.924.2602
Email: rguess@stlouipark.org

A Title VI complaint may also be submitted to MnDOT online at https://www.dot.state.mn.us/civilrights/nondiscrimination-complaint-form.html or using the contact information:

Minnesota Department of Transportation
Office of Civil Rights
395 John Ireland Blvd, Mail Stop 170
St. Paul, MN 55155
Phone: 651.366.3073
Fax: 651.366.3129

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Appendix A

Insert signed version of Title VI Assurances.

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Appendix B

Title VI Complaint Form

Please complete this form to the best of your ability. If you need translation or other assistance, contact Radious Guess, race equity and inclusion director, 952.924.2602.

Name_____
Address_____City_____Zip_____
Phone: Home_____ Work_____ Mobile_____
Email: _____

Basis of Complaint (circle all that apply):

☐ *Race*	☐ *Color*	☐ *Creed*	☐ *Gender Identity*
☐ *National Origin*	☐ *Sex*	☐ *Religion*	☐ *Public Assistance Status*
☐ *Age*	☐ *Disability*	☐ *Marital Status*	☐ *Other*
☐ *Retaliation*	☐ *Low-Income*	☐ *Sexual Orientation*	

Who discriminated against you?

Name_____
Name of Organization_____
Address_____ City_____ Zip_____
Telephone_____

How were you discriminated against? (Attach additional pages if more space is needed)

_____
_____
_____
_____
_____
_____
_____
_____
_____
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Where did the discrimination occur?

_____
_____
_____

When did the discrimination occur?

_____
_____
_____
_____
_____

Were there any other witnesses to the discrimination?

Name	Organization/Title	Work Telephone	Home Telephone

How would you like to see this situation resolved?

_____
_____
_____
_____
_____

Have you filed your complaint, grievance, or lawsuit with any other agency or court?

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Who _____ When _____
Status (pending, resolved, etc.) _____ Result, if known _____
Complaint or case number, if known _____

If you have an attorney in this matter, please provide their contact information:

Name_____ Phone_____
Address_____ City_____ Zip_____

Privacy notice: City of CITY OF ST. LOUIS PARK is asking you to provide information in this complaint form which includes private and/or confidential information under the Minnesota Government Data Practices Act. This private/confidential information is being requested so that all allegations of discrimination can be investigated and addressed properly. You are not legally required to provide this information. However, if you do not provide sufficient information, your complaint may not be able to be adequately investigated. The information you provide will be used by City of CITY OF ST. LOUIS PARK, Minnesota Department of Transportation and Federal Highway Administration employees whose job assignments reasonably require access to the information. The following also have a legal right to access the information: exclusive representative for any MnDOT or City of CITY OF ST. LOUIS PARK employee who becomes the subject of investigation in connection with your complaint; the arbitrator if discipline imposed on any such employee is appealed to arbitration; the MN Attorney General's Office; the MN Legislative Auditor's Office; law enforcement agencies and prosecutorial authorities; persons/entities named pursuant to court order; persons/entities whom you authorize; and any other person or entity authorized by state or federal law.

Signed_____ Date_____

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Who _____ When _____
Status (pending, resolved, etc.) _____ Result, if known _____
Complaint or case number, if known _____

If you have an attorney in this matter, please provide their contact information:

Name_____ Phone_____
Address_____ City_____ Zip_____

Privacy notice: City of CITY OF ST. LOUIS PARK is asking you to provide information in this complaint form which includes private and/or confidential information under the Minnesota Government Data Practices Act. This private/confidential information is being requested so that all allegations of discrimination can be investigated and addressed properly. You are not legally required to provide this information. However, if you do not provide sufficient information, your complaint may not be able to be adequately investigated. The information you provide will be used by City of CITY OF ST. LOUIS PARK, Minnesota Department of Transportation and Federal Highway Administration employees whose job assignments reasonably require access to the information. The following also have a legal right to access the information: exclusive representative for any MnDOT or City of CITY OF ST. LOUIS PARK employee who becomes the subject of investigation in connection with your complaint; the arbitrator if discipline imposed on any such employee is appealed to arbitration; the MN Attorney General's Office; the MN Legislative Auditor's Office; law enforcement agencies and prosecutorial authorities; persons/entities named pursuant to court order; persons/entities whom you authorize; and any other person or entity authorized by state or federal law.

Signed_____ Date_____

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