



# Racial Equity Impact Assessment

<b>Proposal Name:</b>	<b>Transitional Industrial (TI) Zoning District</b>
<b>Description:</b>	<b>Creating a new zoning district and rezoning a group of parcels along the east side of Lyndale Ave between 86<sup>th</sup> and 92<sup>nd</sup> Streets</b>
<b>Department:</b>	<b>Planning Division, Community Development</b>
<b>Contact:</b>	<b>Tom Ramler-Olson, Planner</b>

## Part 1. Set outcomes.

1a. What is your proposal and how does it relate to Bloomington's Racial Equity Business Plan Focus Areas? Will it reduce disparities or discrimination? Does it help Bloomington become a vibrant, safe, and healthy place where people of all races thrive?

The proposal includes two actions. One is to create a new zoning district, Transitional Industrial (TI); the other is to proactively rezone a group of parcels along the east side of Lyndale Ave S between 86<sup>th</sup> and 92<sup>nd</sup> Streets to that new zoning district from the present zoning, General Industry (I-3). This new district was identified as a priority action in the Lyndale Ave Suburban Retrofit Plan, adopted in April 2021. In addition to allowing some industrial uses found in the I-3 district, the TI District will allow other uses that are expected to activate the streetscape of Lyndale Ave, like retail, indoor recreation, and cultural (e.g., museums, libraries, performance spaces, etc.). Unlike the existing I-3 zoning, the TI District will allow multi-family residential, a necessary component to making those activating uses viable. Compared to existing conditions, the TI District will also improve the urban design of Lyndale Ave as it redevelops. The standards will prioritize the comfort and safety of pedestrians walking along Lyndale Ave by requiring active frontage along Lyndale Ave, bringing buildings closer to the pedestrian, and limiting the presence of vehicles on lots.

The proposal presents many opportunities to address disparities and discrimination. Because it will allow residential development (with conditions), it creates more opportunities to add housing units to a popular corridor that already accommodates many amenities and transit services. These additional housing units present the possibility of mitigating the burgeoning cost of

housing for residents through the increase in supply. The TI District will also allow retail development, which if constructed has the potential of bringing needed services to the immediate community and improving access for nearby populations. And finally, the TI District requires specific site and building design standards that improve upon existing conditions for pedestrian safety and comfort. Notably, site standards restrict parking to the side or rear of lots, reducing the potential of conflicts between vehicles and pedestrians. This restriction paired with reduced building setback standards will allow pedestrians to access a building with limited risk from vehicles. In addition, buildings will be required to have active and transparent ground floors and be able to be located right up to the sidewalk, improving the pedestrian experience and safety along Lyndale Ave by increasing “eyes on the street.” If buildings are set back from the sidewalk, the space created by that setback could be used for passive greenspace or active uses like patios. Overall, this proposal is anticipated to improve both vibrancy and safety along the corridor as sites redevelop or expand.

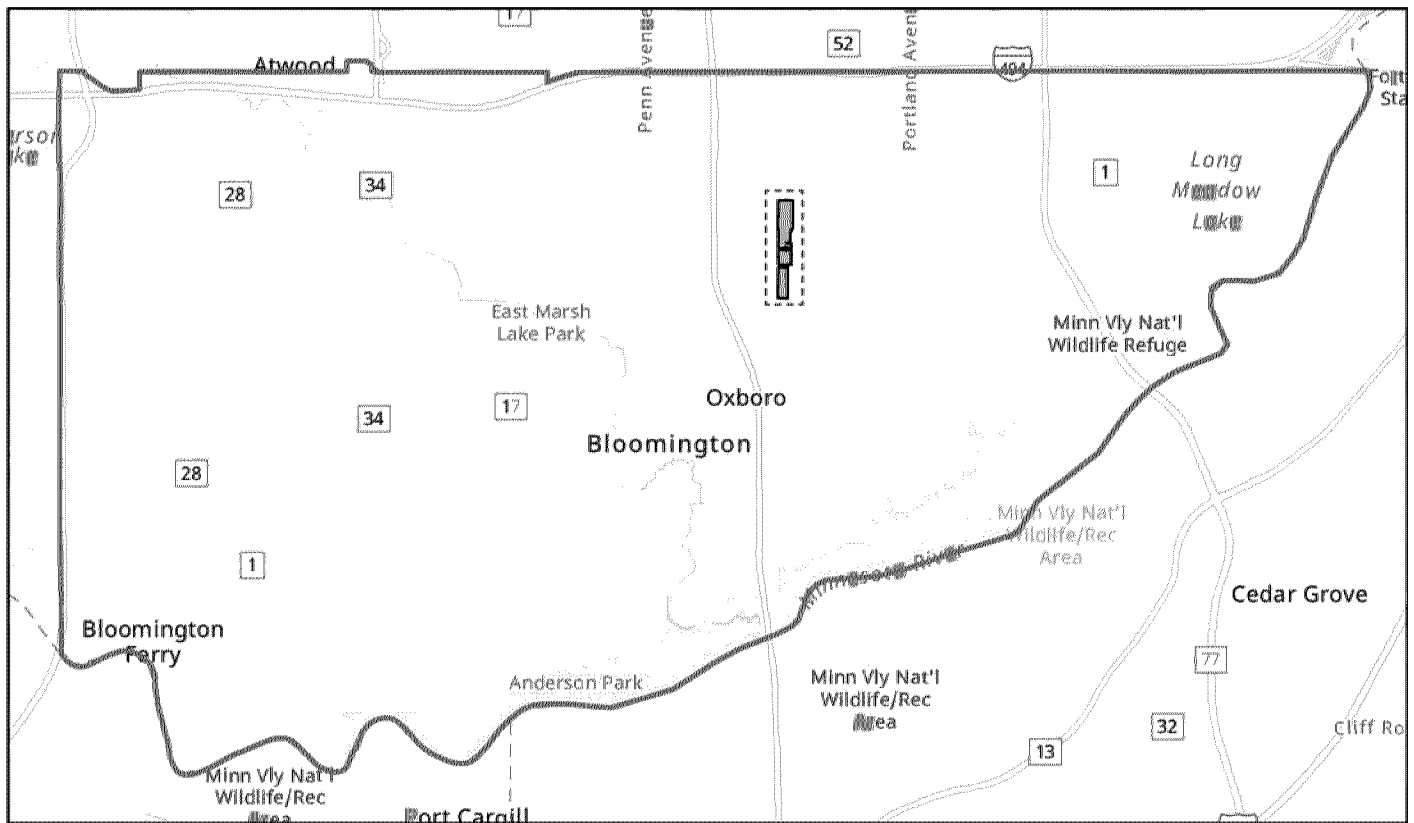
Focus Areas	How does this proposal relate?
Workforce Diversity	NA
Training and Professional Development	NA
Equitable Outcomes in Services Delivered	NA
Strategies/actions that reduce racial inequities (health, sustainability, jobs, housing, contracting, etc.)	The proposed district and rezoning expand opportunities for more housing, which may provide some relief in a constrained market. The proposal also allows for more retail and more business uses, which may increase more job opportunities and services in the area. As it relates to sustainability, it allows for more intense development in an established area, which reduces pressure to develop greenfields.
Authentic Community Engagement	NA

## Part 2. Analyze data.

2a. Are impacts from this item concentrated and/or more visible in specific geographic areas?  
If yes, identify on Bloomington map.

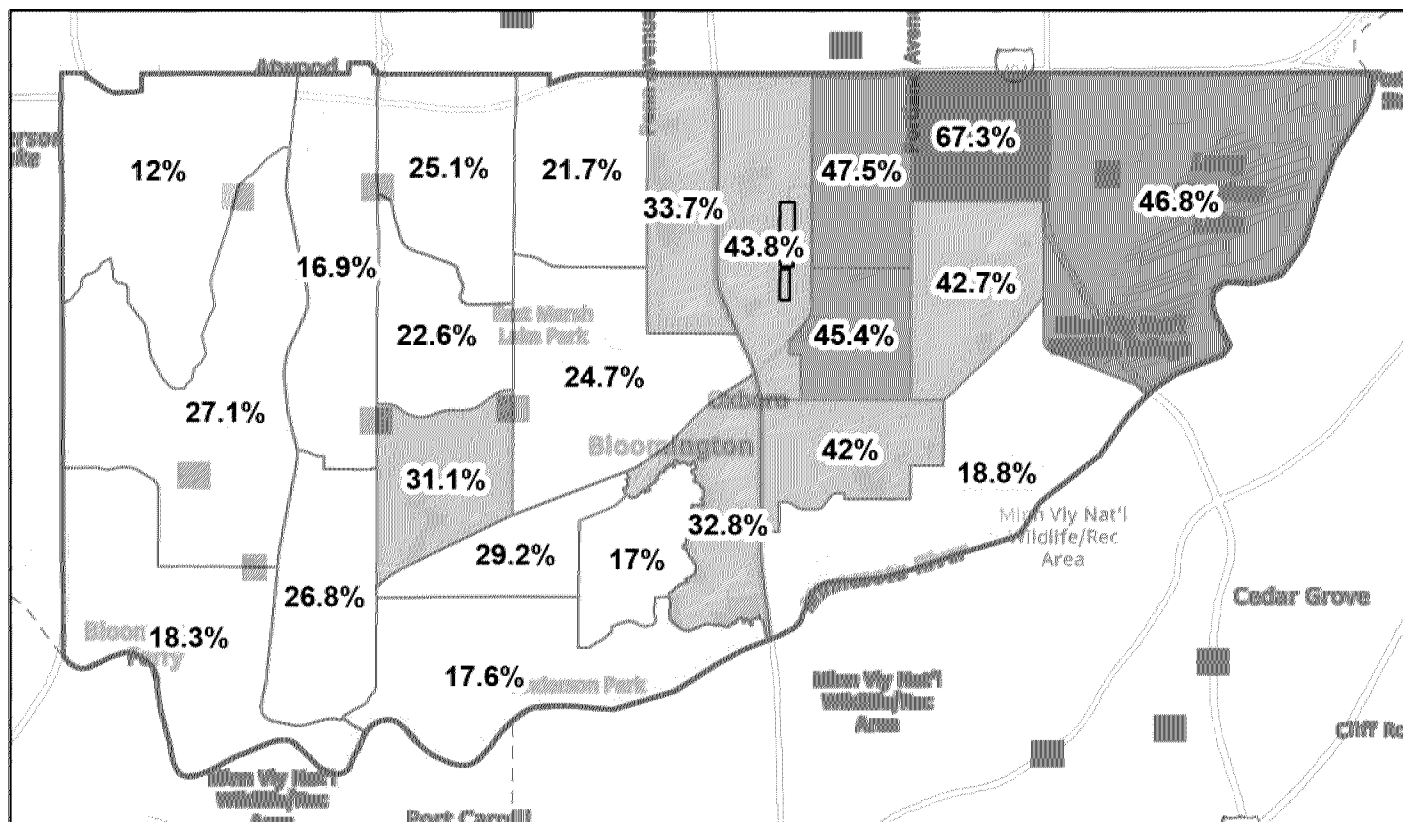
The proposal is geographically confined to an area along the east side of Lyndale Ave between 86<sup>th</sup> and 92<sup>nd</sup> Streets. The location of the area (highlighted by the box with the dashed red edge) is shown on the map below.

While the proposal includes the creation of a new district, it was fashioned to be applied to the highlighted area and not anywhere else. So, it is a unique district in that respect. This approach was used to implement one of the action items identified in the Lyndale Avenue Suburban Retrofit Plan (“Retrofit Plan”), which was adopted in April 2021. That document guides the evolution of Lyndale into a pedestrian-friendly corridor flanked by high-density development, a departure from its current auto-oriented design. It recognized, however, that zoning standards and other regulations could complicate the implementation of its vision for Lyndale. One of the action items identified was to re-examine the industrial zoning and introduce a new zoning district to establish a more pedestrian-friendly character while not outright banning industrial uses.



2b. What are the racial demographics of residents in the area or are impacted by the issue?

The map below shows the percentage of the BIPOC population for each census tract within Bloomington. Out of the city’s 23 census tracts, the census tract that contains the rezoned area (Census Tract 1255) has the fifth highest percentage of BIPOC residents.



## 2c. How are they impacted?

The size of the proposal's impact on this population is hard to quantify. However, that the proposal will allow residential and retail development could be impactful. The scarcity of affordable housing affects disadvantaged communities the most. So, adding more opportunities for housing development is a positive step to addressing that issue. Retail will not only bring services closer to local residents but could also offer more employment opportunities. However, this proposal alone is not guaranteed to benefit BIPOC residents unless other policies are pursued by the City to support the vibrancy and safety of the area.

## Part 3. Involve stakeholders.

3a. How have you involved community members and stakeholders in discussing, planning, developing, or reviewing this proposal? Have stakeholders from different racial/ethnic groups – especially those adversely affected – been informed, meaningfully involved and authentically represented in the development of the decision? Who's missing and how can they be engaged?

Refer to the [IAP2 Spectrum](#) in your discussion of community engagement.

Staff chose Consult as the appropriate level of public participation. With that determined, staff did a combination of in-person and virtual engagement. The in-person activities included door-knocking on businesses located in the area proposed for rezoning and those abutting those parcels prior to drafting the ordinance. Door-knocking resulted in multiple conversations with

both business owners, employees, and other miscellaneous tenants. Staff also held two open house meetings: one in-person at City Hall and the other over Zoom. COED set up a Let's Talk Bloomington page that describes the project, provides updates, and acts as an online medium for offering commentary and posing questions. Connections made during engagement activities helped facilitate future one-on-one conversations with staff that allowed more in-depth discussion and an opportunity to have all questions answered.

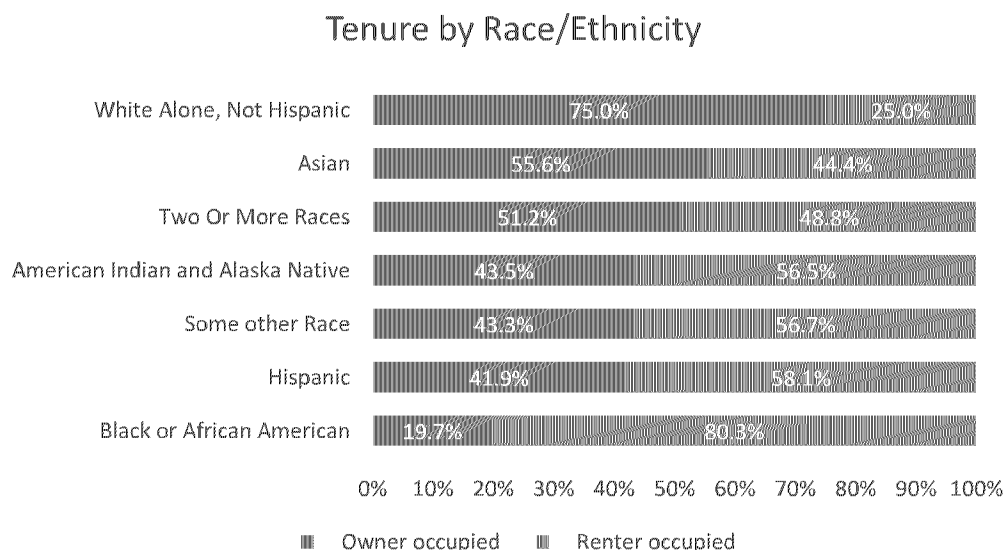
3b. What do your conversations with stakeholders and data gathered tell you about existing racial inequities in the community?

The issue of racial inequities was not directly brought up by residents or persons associated with a business in the area that participated in the engagement activities. While some acknowledged the scarcity of affordable housing and the relief that could be provided with the TI District, they focused on the changes that were proposed by staff and how it would affect businesses. Mailers advertising the engagement activities described above were sent to neighboring properties, but no residents attended or participated. Some discussion was held about the potential benefit of increased opportunities for commercial services.

#### Part 4. Determine benefits and/or burdens.

4a. Which racial/ethnic groups are currently most advantaged and most disadvantaged by the issue this seeks to address?

Please refer to the table below. Pulled from the 2020 Census, it shows the racial demographics of owner- and renter-occupied housing units in Bloomington. It also provides a general picture of Bloomington's homeowner and renter population that adds some clarity to housing issues in the city.



4b. What positive impacts on equity and inclusion could result from this proposal? Which racial/ethnic groups could benefit?

Considered in isolation, the benefits of this new district to racial/ethnic groups may not be significant. After all, it is a small area that will be rezoned. However, it is part of a larger plan for Lyndale Ave that seeks to add more housing units, calm a major corridor to expand opportunities for other modes of transportation, and improve safety and vibrancy.

4c. What adverse impacts or unintended consequences could result from this action? Which racial/ethnic groups could be negatively affected?

One unintended consequence would arise if major industrial employers in or around the area leave or shrink operations due to focus on making Lyndale Ave pedestrian-friendly and other perceived incompatibilities with new uses such as residential. If residential and retail uses increase substantially, it may also make the rezoned area less viable for new industrial employers locating to the area. Staff is unaware of any businesses that are considering moving out since the project began. Staff was very considerate of the needs of existing businesses and worked to accommodate them as much as possible in light of the plans for Lyndale. Nonetheless, if the new district does negatively impact employers, that may be felt more acutely in disadvantaged communities. However, staff does not have information on the local racial demographics of employment or business owners, so the degree of impact is unknown.

Another potential adverse impact could be land use conflicts. The TI District will allow residential and retail where it was previously prohibited among various industrial uses. The TI District would limit some types of new industrial uses while existing industrial uses would remain. The mixture of residential and industrial uses increases the potential for land use conflicts. Residential development opportunities could be compromised by the ongoing presence of industrial uses. Conversely, industrial development and the employment it provides could be limited by the presence of residential uses. It's not known which racial/ethnic group could be impacted by these potential conflicts, but if housing or industrial development were compromised, it is reasonable to assume that those conflicts would be felt more acutely by communities of color.

4d. Are you accomplishing what you set out to do in Part 1? If not, how can you minimize harm or change your proposal so the work is not creating greater inequity.

Yes.

## **Part 5. Develop strategies to eliminate inequities and advance**

5a. How could adverse impacts be prevented or minimized?

An approach to addressing conflicts between uses is to rely on performance standards for evaluating development. Staff can use those standards to impose reasonable conditions to mitigate nuisances experienced by both residential and non-residential properties.

To prevent or minimize adverse impacts to industrial businesses or any others that are compromised by nearby residential, it's critical that the city be responsive to business concerns and work with them address those impacts.

5b. Are there further ways to maximize equitable opportunities and impacts?

Staff expects to maintain engagement with residents and businesses in the area so that concerns are heard and issues created by the new district are addressed. The TI District is fairly innovative by allowing residential uses in proximity to industrial uses, so there is an expectation that code will need to be refined to account for unforeseen situations resulting from this arrangement.

Planning staff also will continue to partner with the Port Authority to support affordable housing development by creating opportunities where possible and supporting site improvement to lessen potential land use conflicts.

5c. Are there ways to revise the proposal to reduce racial disparities and advance racial equity? What could be changed, removed, or added to ensure positive impacts on racial equity and inclusion?

Staff supports the establishment of local businesses. However, when compared to national chains, they can experience greater difficulty in developing because of having to meet code standards that impose great expense, straining their resources. To lower barriers to local business development, staff could consider relaxing some of those standards under certain circumstances. In addition, staff will continue to support various workforce and business development programming that the City has or will develop.

5d. What are your strategies (short-term and long-term) to reach your desired racially-equitable outcomes and address the impacts? How will you measure and track the progress?

The impacts of the new district will take place over several decades as market driven redevelopment occurs. However, it's highly probable that some properties will propose modest changes to their structures or site design in the short-term. Staff will monitor these proposals and the complexity of implementing them. If it seems reasonable to amend code to address those challenges, staff will do so. As for long-term strategies, this proposal could be supported by the City by adopting targeted policies that help local businesses and start-ups.

**Part 6. Evaluate. Raise racial awareness. Be accountable.**

6a. How will you evaluate and be accountable?

Staff expects to maintain communication with local businesses, stakeholders, and residents on the implementation of this action item from the Lyndale Ave Suburban Retrofit Plan. Through that communication and continual observation, staff will suggest adjustments to Code where necessary.

6b. What issues or racial inequities are unresolved? What resources/partnerships do you still need to make changes?

This new district and rezoning will create more opportunities for business and housing development. However, the size of its impact will not fill the gaps that exist for housing affordability. Also, as stated previously, the redevelopment of Lyndale and the businesses that front it is expected to take many years, which doesn't address the housing crisis that's going on at the present moment. More action is needed, which could include partnerships with the following:

- Local businesses
- Developers and builders
- Renters
- Housing advocacy groups

6c. How will you share information learned from this analysis with your department? How will you raise awareness about racial inequity to this issue at the City?

Planning staff will coordinate with business programming within the Port Authority. We'll also educate Current Planning staff about new rules, regulations, and opportunities created by this proposal. Finally, staff can tell a story about how this type of district supports new business creation and growth and more opportunities for affordable housing development.