

Proposed Amendment to the Administrative Procedure for
Preparing, Approving and Amending Project Plans and Finance Plans

Public Comments

-----Original Message-----

From: Rachel Dittli [<mailto:rdittli@gmail.com>]

Sent: Thursday, April 12, 2007 9:49 AM

To: Mathieu, Joan M.

Subject: proposed amendment to the Administrative Procedure for Preparing, Approving and Amending Project Plans and Finance Plans.

Allowing web-posting of project plans is a good idea, and should save time and money. Eliminating the 45 day review period of proposed projects is a poor idea. If the reviewing committees were perfect and all builders ethical and truly concerned with the needs of the neighborhood, you could do away with the extra time. However, we know this is not the case. Public review of possible project plans is important - public review, however extended, of completed plans is an exercise in futility.

Leave the 45 day review of possible project plans and their permutations in the process. We need "notice of the city's intent to prepare a proposed plan." Don't take away our right to try to build our neighborhoods for our families.

Thank you!

Rachel Dittli

resident of Minneapolis

Comments submitted by telephone by Scott Vreeland, 2437 33rd Avenue South on
April 16, 2007:

"The amendment should have some specific language about preserving early neighborhood review of projects before they're completed projects. All work on the front end is very helpful. When proposals are presented without that kind of review, you get lawsuits and controversy."

From: Florence Littman [<mailto:littm005@umn.edu>]

Sent: Monday, April 16, 2007 2:46 PM

To: Mathieu, Joan M.

Cc: Gordon, Cam A.

Subject: CPED Admin. Procedure Amendment
April 16, 2007

To: Joan Mathieu, Minneapolis Finance Department

From Joseph Ring, PPERRIA President

RE: The CPED Admin. Procedure Amendment

The Prospect Park and East River Road Improvement Association strongly supports the citizen participation process. We oppose all efforts to curtail citizen participation including recent policies that deny access to information and substitute administrative review for public hearings. It appears that the proposed CPED Admin. Procedure Amendment (Administrative Procedure for Preparing, Approving and Amending Project Plans and Financial Plans, Proposed Amendment: March 1, 2007 Draft) is yet another effort to curtail citizen participation by eliminating the initial 45-day review by neighborhoods and replacing it with a 45-day review after a developer has submitted a proposal to CPED/Planning. This denies us the opportunity to work with the developer. Decisions that we must live with will be made by the developer and the planners. Denying input from those who must live with the decision is poor policy. We oppose this proposed amendment.

c. Council Member Cam Gordon



April 16, 2007

Joan Mathieu
Minneapolis Finance Department
105 5th Avenue South, Suite 200
Minneapolis, MN 55401-2534

Re: Proposed Amendment to Administrative Procedure for Preparing, Approving and Amending Project Plans and Finance Plans

Ms. Mathieu:

Thank you for providing notification and information regarding this important administrative procedure.

Minneapolis neighborhood organizations and business associations have had a long history of working with the planning and development staff on the creation of a variety of development projects that require public financing. Neighborhood organizations and business associations have financed and developed small area plans, streetscapes, marketing programs, etc. in coordination with the City Minneapolis. Neighborhood groups and business associations are often times key implementers of the projects --working with both the private market and Nonprofit CDC's (Community Development Corporations) with little direct support of City staff or other resources.

Additionally, neighborhood groups access additional resources to build upon existing City of Minneapolis Plans. This additional information is usually generated over the course of years after a formal City Council action regarding an area. At times, neighborhood association may have more current information regarding a plan area and/or community needs. Early upfront coordination helps develop plans that meet community needs and may avoid multiple or delayed Public Hearings, a slowing of the general process, and last minute modifications.

The Harrison Neighborhood Association represents a diverse and politically disenfranchised community. We deeply appreciate early notification. This allows us to begin to mobilize and educate community leaders, stakeholders and resources within the neighborhood to provide meaningful and representative input.

Sincerely yours,

Mitch Thompson
HNA Board President

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Proposed Amendment to the Administrative Procedure for
Preparing, Approving and Amending Project Plans and Finance Plans

Clarification Sent to Neighborhood Groups on April 16, 2007

From: Cooper, Bob I.
Sent: Monday, April 16, 2007 3:27 PM
To: Cooper, Bob I.
Cc: Mathieu, Joan M.
Subject: Clarification on Proposed Amendment to Administrative Processes for Review of Project Plans
Importance: High

It has become apparent that summary language in the March 1 invitation to comment on the proposed amendment to the Administrative Procedure for Preparing, Approving and Amending Project Plans and Finance Plans is unclear and subject to misinterpretation. The summary states that the proposed amendment "eliminates a 45-day notice of the City's intent to prepare a proposed plan (replacing it with a 45-day review period of the actual proposed plan)." This could be interpreted to mean that currently there is a 45-day notice or alert prior to the availability of a draft plan, followed by another 45-day review period of the actual draft plan.

In fact, the current language in the Administrative Procedure provides for only one 45-day period: On Day 1, notice is provided regarding the City's intent to prepare a plan; on Day 15, the actual draft plan is transmitted to neighborhood groups for review and comment; on Day 45, comments are due; and on Day 46, the public hearing occurs.

The City is not proposing the elimination or shortening of the 45-day review period. What is being proposed extends the time period when the actual draft plan is available for review from 30 days to 45 days.

Again, the old practice was:

- 1) 45 days before the anticipated City Council public hearing on a proposed plan, neighborhood groups received a notice of the City's intent to prepare a proposed plan.
- 2) Then 15 days later, neighborhood groups received an actual copy of the proposed plan.
- 3) Neighborhood groups then had 30 days to review the proposed plan and submit comments.

The proposed new practice is:

- 1) 45 days before the anticipated City Council public hearing on a proposed plan, neighborhood groups receive a copy of the proposed plan (via an e-mailed link to a posting on the City's web site).
- 2) Neighborhood groups now have 45 days to review the proposed plan and submit comments.

It also should be noted that the Administrative Procedure for Preparing, Approving and Amending Project Plans and Finance Plans only relates to specific redevelopment and tax increment financing plans as defined in the Procedure, not the front-end community planning process.

I hope that this clarifies the intent of the proposed changes. If you have any questions, please contact Joan Mathieu at 612-673-5053 or joan.mathieu@ci.minneapolis.mn.us.

-----Original Message-----

From: Brad or Carol Pass [<mailto:brpass@yahoo.com>]

Sent: Thursday, April 19, 2007 4:40 PM

To: Mathieu, Joan M.; Cooper, Bob I.

Subject: City seeks comments on administrative procedures for project plans

Bob, Joan and whoever else is to receive these comments-

I realize the comment period is past, however I am responding, Bob, to an email received from you regarding this proposed change. I would like to have my remarks included somewhere, since I am responding in return. It would also be great to have access to the other people's comments. These are serious changes. Is this public information??

So, here is my response.

An analysis of the proposed changes in Administrative Procedures for Project and Financial Plans

1) While I recognize that there is a 45 day review period in either case, there is a considerable difference between a neighborhood's being given a completed proposal to react to (the new city policy) and being informed of an intent (the old policy being replaced).

In the old policy where there is not an already formed policy by CPED but only an intent, there is the possibility of working in partnership with the relevant neighborhood to actually create the proposal.

There is the suggestion that the city is open to working together, since the project is still in a formative state. To be informed of an intent is near to stating a willingness to use neighborhood knowledge and assets to create a better project.

In the new policy that will replace this, neighborhoods are only given the possibility of reacting to a project already formed without their input. Furthermore, by the time the neighborhood receives the proposal the city will have invested money and staff time to it and have a committed vested interest. Change, modification or scrapping it altogether will be difficult if not impossible.

The difference is between making a better project on the front end versus reacting to the proposal on the back end. The difference is in the one case the neighborhood can be partnered with. In the other case, the neighborhood is only informed.

2) Likewise, the difference between informing the County of the intent to prepare a proposal and presenting the County with a finished product to react to has the same difficulty as the previous situation.

In the first case, the current practice, the County could be a partner in the creation of the proposal or at least minimally involved. In the new policy, which would be its replacement, the County is informed after the plan is created. The suggestion is that any other involvement than the City's internal planning process is extraneous and not sought after.

In the current policy, if I understand this right, the relevant County Commissioner is informed of CPED's intent 30 days prior to the public notification of the public hearing. Together with the required 30 days from that date, the County Commissioner currently appears to have a 60-day window to respond to even the "intent" to create a proposal. The new policy would give the County Commissioner the same time as the neighborhoods, 45 days to only react to a completed proposal created by the city alone.

Perhaps there is no concern with bringing the County in later, after the proposal is created and with what seems a shortened notice period and not bringing them in as colleagues in its creation. If I were a County Commissioner, however, this would concern me.

3) In the current policy, the Ways and Means Budget Committee reviews the plan prior to the public hearing and prior to the request for approval from the Community Development Committee. This way the CDC can make use of the Ways & Means Committee's comments in their assessment. The Ways and Means committee has members who

were elected to watch over and assess the expenditure of city funds on projects. Having the Ways and Means budgetary comments in front of the Community Development Committee (CDC) assures a much more responsible and transparent use of city funds by CPED for development. A good question is how the CDC can come up with a responsible and transparent approval process without the Ways and Means budgetary assessment in front of it. The only financial assessment prior to CDC assessment will be an internal one emerging only from CPED itself, without this other valuable public oversight.

Having the Ways and Means budgetary assessment before it and available to the public hearing as it is now, instead of after all these meetings and recommendations happen as proposed, also assures a meaningful public hearing and CPED's transparency and accountability for the use of public funds for its various projects. Clearly, it is a waste of the valuable public openness and usefulness of the Ways and Means Committee to position its review and assessment after both the public hearing and the request for approval from the Community Development Committee. Both processes would be fumbling in the dark to some extent without this information and their comments and assessments would be ungrounded and have seriously decreased value without the considerations of the Ways and Means committee's budgetary comments included.

What this boils down to is that after everyone has made their comments and assessments on a proposal, the neighborhoods, the appropriate County Commissioner, the CDC, and after the public hearing has occurred, then at last after all this effort at good thinking, we get the financial assessment by the Ways and Means Committee. This does not make sense and removes accountability, transparency and the possibility of financial integrity from all these various public bodies' responses. It essentially invalidates them all to a great extent and renders the review work of the Ways and Means committee useless to the public process, since it would occur after the public process has happened. Perhaps that is the point, but then how are the citizens to make any use of their own elected outside reviewers of how CPED chooses to spend our money?

This new proposal is not about 45 days or the lack of it. It is about the description of how decisions are made and who participates in making them during that 45 days. It is about whether or not the future of the City is to emerge in a participatory manner or not.

These changes make it harder for citizens and the County to both participate and monitor the creation of the future of our city. It appears that the citizens and the County are only informed and react to the proposals and choices of CPED regarding these kinds of developments and are not included from the outset as a part of the process. It seems to many of us that embedded in these changes is the issue: Do we all stand on the sidelines and watch a future unfold that we are not included in creating? Or are we going to actively participate in the future's creation? I think these changes do not move us in the right direction and, while the administrative process could be more clear, these proposed changes will move us away from, not toward, greater community engagement.

Carol Pass