



Shingle Creek
Neighborhood Association
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Brock Hanson, Chairperson

Neighborhood and Community Relations Department
Attention: David Rubedor
City of Minneapolis
Tri Tech Center, Room 220
331 2nd Avenue South
Minneapolis, MN 55401
(612) 673-3737
ncr@minneapolismn.gov

November 22, 2011

Re: Comments on CPP guidelines

Dear Mr. Rubedor,

Please find comments from the Shingle Creek Neighborhood Association regarding the draft CPP Guidelines.

Thank you for your consideration of these comments and suggestions.

We look forward to hearing from the NCR Department prior to the public hearing regarding any possible solutions that will address our concerns.

Respectfully,

Brock Hanson
SCNA Chair

Shingle Creek Neighborhood Association

Comments on Draft Community Participation Program Guidelines November 21, 2011

The Shingle Creek Neighborhood Association (SCNA) has successfully represented the interests and priorities of Shingle Creek neighborhood residents through the Minneapolis Neighborhood Revitalization Program (NRP) created by the NRP Law and established as a Joint Powers program in 1991 by multi-jurisdictional actions to preserve and enhance private and public infrastructure, public health and safety, economic vitality, sense of community, social benefits and capacity building in the neighborhoods of the City of Minneapolis.

The SCNA Board of Directors, on behalf of the Association as approved at its November 2011 meeting, wishes to document the following comments and concerns relative to the proposed 2012 Draft Community Participation Program (CPP) Guidelines submitted for public review and comment by the Neighborhood and Community Relations Department (NCR) and Neighborhood and Community Engagement Commissioner (NCEC):

1. Neighborhood Priority Plans (NPP) Requirements (Section I): SCNA holds that Neighborhood organizations must be able to easily reference aspects of adopted Phase II, or Phase I, neighborhood action plans, especially in consideration of the City's capture and use of Phase II uncontracted funds to fund the City program from July 2012-December 2013. Initial drafts of the guidelines indicated that NPP's are discretionary, but NCR staff have subsequently communicated that at least a single NPP per neighborhood organization is mandatory.
2. Community Participation Program (CPP) Plan Approval (Section III): SCNA objects to the City proposed guidelines to bring both NRP-derived and non NRP-derived CPP funds under the NRP Policy Board and NRP Statutes. Consolidated Tax Increment Financing funds from the Transformation Districts were subject to use for neighborhood revitalization purposes, but should not be subject to the more restrictive provisions as those governing NRP program funds.
3. CPP and NRP Action Plan Implementation (Section III): SCNA supports guidelines that permit Neighborhood Organizations to use CPP funds for implementation of Policy Board and City Council approved NRP Neighborhood Action Plans from Phase I or Phase II, especially for the CPP funds derived from uncontracted Phase II NRP funds captured and used to fund the City's program.
4. CPP and Under Engaged Stakeholders (Section IV): SCNA recommends that the language in Part 5 be replaced to read, "The NCR Department will conduct outreach to the Neighborhood Organizations on how the NCR can assist with outreach to under engaged stakeholder groups in each of the neighborhoods."

5. CPP Plan Approval (Section IV): SCNA opposes the transfer of approval authority to the NCR Director and away from the NCEC. The NCEC is a 16-member commission that includes 8 members directly selected by Neighborhood Organizations, whereas the NCR Director is a city employee, not hired, appointed, or supervised by the NRP Policy Board or the Neighborhood Organizations. Further, there is no common sense logic to the role of the NCEC to hear appeals of funding matters on which original jurisdiction is proposed to shift from the NCEC to the NCR Director, or to the “new” NRP Policy Board to be re-established by the City in 2012. It follows that the NCEC, not the NCR Director, shall retain authority to waive portions of the eligibility criteria.
6. NPP Mandatory Status (Section V): SCNA objects to the mandatory NPP requirements for Neighborhood Organizations during the time period July 2012-December 2013, when uncontracted Phase II NRP funds captured by the City are being used to fund the City’s program (Also see bullet point #1 incorporated herein by reference).
7. NPP and Resource Allocation/Mitigation of Frozen Phase II Funds (Section V): SCNA requests that the City, through the NCR Department and the NCEC, develop a plan to mitigate financial impacts from the “frozen Phase II NRP funds” and implement the “Equity Directive” through capital improvement program funds or other municipal resources, over and above CPP funds.
8. NPP Reporting (Section V): SCNA requests that the two reports to be generated annual by the NCR Department pursuant to this section shall be distributed to all recognized Minneapolis Neighborhood Organizations in a timely manner.
9. CPP Unused Funds (Section VIII): SCNA requests that in order to provide due process to recognized Minneapolis Neighborhood Organizations, that provisions for notice and some form of appeal process be developed and implemented, for the process for retention of Unused CPP Funds by the NCR. SCNA requests that notice and appeal provisions be incorporated into the final CPP guidelines.
10. CPP and NPP Administration (Section IX): SCNA requests that the City Council and Mayor negotiate an agreement with the “new” NRP Policy Board, to be re-established in 2012 for the NRP Policy Board to enter into an agreement for the residents-based city commission (NCEC), which has representatives directly selected by Neighborhood Organizations, to fulfill the Policy Board’s purposes, as permitted under Minnesota Statutes, section 469.1831, Subd. 6 (e) (5).