

**Comments from the Board of Directors of the Kenwood-Isles Area Association (KIAA) RE:
Proposed Revised NCR Community Participation Program (CPP) Guidelines
Nov. 21, 2011**

1. At its outset, this Guidelines document should acknowledge the funding source for the 2012/2013 CPP “grant program”: the Phase 2 NRP Funds frozen in December 2010 by City Council/Mayor actions in the context of adopting the City’s 2011 budget. These NRP funds have been taken from Mpls neighborhoods that had expected to be able to use these funds to implement their neighborhoods’ Phase 2 NRP Action Plans.

NRP funds are subject to the requirements/restrictions in the Minnesota State NRP statute. The Guidelines document also should clarify which of the proposed revisions relates specifically to that Statute.

2. These proposed Guidelines appear to require extensive NEW organizing and planning activity. The Guidelines section I.B, “Neighborhood Priorities: Organize, Plan, Partner, and Implement” should be rethought and redone, along with Section IV, “Requests for Written Submissions.”

It is important for these Guidelines to acknowledge that Mpls’ NRP neighborhoods have been engaged in “organizing, planning, partnering, and implementing” activities for the past 10-15 years, or longer. The proposed new requirements seem unnecessarily bureaucratic, and border on being “makework”. Most Neighborhoods whose Phase 2 NRP funds were “frozen” and then “taken” via the City’s December 2010 action already had/have clear plans in place that they now are prevented from implementing because the City took their funding. It is unreasonable to expect those neighborhoods to engage in a new, elaborate planning process. At this point, those neighborhoods need funds to carry out at least some of their already-approved priorities and plans.

The Guidelines should differentiate among neighborhoods that are in different stages along the NRP continuum.

Any neighborhood that has NOT yet completed its Phase 2 NRP Action Plan will need help from available City staff to accomplish that work. Dealing with unfinished Phase 2 NRP Plans and priorities will pose major challenges to the affected neighborhoods, to the new City staff hired to assist them, and to the “new” NRP Policy Board that the City plans to establish in 2012.

3. The NRP funds available to neighborhoods in 2012 & 2013 are a total of approximately \$7.5 to \$8M; or \$3.75 to \$4M in each of those 2 years. No funding source to maintain this program beyond 2013 has been identified. This fact should be stated in the Guidelines, since it gives some sense of proportion and longevity to the activities in which neighborhoods are expected to engage. Minneapolis has more than 70 recognized/designated NRP neighborhood groups. The math demonstrates that the available funds are limited. Moreover, the levels of need in neighborhoods vary greatly within the City as a whole. This leads to a discussion of the **proposed Allocation Formula** in the Appendix of the proposed Revised CPP Guidelines.

The Proposed Allocation Formula needs to be reworked. Missing from the allocation formula is a weighting category that recognizes the predicaments of neighborhoods whose NRP funds were

seized by the City following the Council/Mayor's sudden December 2010 *freeze* action. These neighborhoods should receive proportionally more NRP funding than neighborhoods *with similar demographic characteristics* that did NOT lose substantial funding in the December 2010 *freeze*.

The proposed Allocation Formula also includes a category: *English as a Second Language (ESL) Students*, based on the number of *Minneapolis Public Schools'* student-residents in the neighborhood, whose home environment is not primarily English-speaking. Since many "ESL" students residing in Mpls are NOT enrolled in the MPS, and many who attend MPS are not enrolled in the closest school, this is a questionable factor and may not be a valid measure of a neighborhood's level of need.

Instead, the proportion of *neighborhood households/residents with poverty-level incomes*; the *condition of the neighborhood's housing, including foreclosure rates*; along with the *crime rates within the neighborhood* should be much more heavily weighted. These would be fairer and more reliable indicators of needs for NRP investments. Hopefully, the City has access to recent Census Bureau information that can help to differentiate among neighborhoods in terms of financial needs and population demographics.