



SECIA
(see-key-ah)

PO Box 18460
Minneapolis, MN 55418

www.secomo.org
secomo@secomo.org
612-685-0371

The Southeast Como Improvement Association works to maintain and enhance the physical, social, and economic environment of our neighborhood. Through programs that serve our community's present and future needs, through communication, stewardship, and citizen involvement, we strive to foster a sense of community and to promote the neighborhood as a vibrant place to live.

Our programs and activities are open to ALL and do not discriminate on the basis of race, color, national or ethnic origin or immigration status, age, religion, disability or handicap, sex, gender identity and/or expression sexual orientation, military or veteran status, or genetic information,

*Para asistencia
secomo@secomo.org, Yog
xav tau kev pab
secomo@secomo.org, Hadii
aad Caawimaad u
baahantahay
secomo@secomo.org*

To: **David Rubedor**
*Assistant City Coordinator
Neighborhood and Community Relations Director*
Marcea Mariani
Neighborhood & Community Relations Commission (District 8)
Cam Gordon
Council Member (Ward 2)
Kevin Reich
Council Member (Ward 1)

July 6, 2018

Re: The Minneapolis 2040 Plan
Public Review and Comment Process

The Southeast Como Improvement Association (SECIA) is registering a complaint with the Neighborhood and Community Relations (NCR) department, the Neighborhood and Community Relations Commission (NCEC) and with the City of Minneapolis via our City Council representatives regarding the Minneapolis 2040 Plan public comment process.

We are particularly concerned with:

1. The barriers the on-line version has created, especially the inability for those without robust home internet access to review the document.
2. The obstacles to understanding caused by the segmented nature of the on-line version, which hinders comprehensive understanding the Plan and its potential impacts on neighborhoods.
3. The difficulty in commenting on the plan as a logical whole or in major areas rather than just in segmented details.
4. The lack of clarity regarding the proposed implementation of the Plan related to the new 'Built Form' and 'Land Use' language.

The City of Minneapolis includes the following language in its vision statement:

- We work by...
 - **Engaging the community** - All have a voice and are heard
 - **Building public trust** - All have access to services and information. We work in an open, ethical and transparent manner.
 - **Collaborating** - We work better together as one team. We are a valued partner in the community.

In establishing the Neighborhood and Community Relations (NCR) department, the City Council adopted the following Core Principals of Community Engagement:

1. **Right to be involved** – Public participation is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process.
2. **Contribution will be thoughtfully considered** - Public participation includes the promise that the public's contribution will be thoughtfully considered.
3. **Recognize the needs of all** - Public participation promotes sustainable decisions by recognizing and communicating the needs and interests of all participants, including decision-makers.
4. **Seek out involvement** - Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision.
5. **Participants design participation** - Public participation seeks input from participants in designing how they participate.
6. **Adequate information** - Public participation provides participants with the information they need to participate in a meaningful way.
7. **Known effect of participation** - Public participation communicates to participants how their input affected the decision.

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The Minneapolis Comprehensive Planning process is the most important work that the City undertakes each decade.

Yet the process itself violates the Minneapolis Vision and the Core Principals of Community Engagement in numerous ways. The current draft of the Minneapolis 2040 Plan includes proposed language that will have implications beyond any prior Comprehensive Plan including virtually – or actually – rewriting the Minneapolis Zoning Code. This plan will have deep and far-reaching effects on individuals, properties and whole communities.

Many still do not even know about the Plan. Even those that participated in the public open houses never saw preliminary indications of the policies developed for this document. The City went from simple yes/no presentation boards (do you want more green spaces, more affordable housing, better pedestrian ways, etc.) to a fully realized city-planning document without any discussions - or brainstorming with constituents - in between.

Collaborating - We work better together as one team. We are a valued partner in the community.

Minneapolis posts these words as part of its vision statement. Unfortunately, the comprehensive plan process follows Minneapolis' traditional insistence that the public's role through stages 1-4 of the plan development only includes "whether the public agrees with the plan's proposed major themes and if participants see themselves in the direction the plan is heading". Only then ending in stage 5 where we (the affected parties) finally get to "inform the final plan through a thoughtful review process" [a.k.a. public comment period]. So reaching stage 5 with little true community dialogue, the Plan landed fully formed in the public realm late March 2018. (Stages defined by the Minneapolis 2040 Engagement Roadmap)

Building public trust - All have access to services and information. We work in an open, ethical and transparent manner.

Almost immediately, there were many issues identified with the format of the Plan and with the on-line version being the only existing option for review. Constituents found that the structural layout of the on-line version along with Minneapolis' insistence on only the one method for accessing the plan were barriers in and of themselves to clarity and understanding. As long as the physical tools engender confusion and raise questions, there can be no ethical or transparent participation.

In this complaint, we will focus on a few key issues that negatively affect the public's ability to 'inform the final plan'. This is a critical issue since this will be the only time we actually get to review predetermined (not discussed) strategies.

- (1) When the Minneapolis 2040 Plan went live for public comments, (March 22, 2018), the only way to review the plan was on-line through a multi-layered, non-linear and fairly hard to understand web site. The site relies heavily on large graphics, requires many clicks to move around the layers and a lot of scrolling which make the screens slow to navigate. This is especially true for many with poorer connections or are having to use public access points. Many of the City's residents do not have high-speed internet access thus making using a graphic intensive multi-page on-line tool even harder. It can be frustratingly slow.

For those who do not have any access from home, they have become second-class citizens. They need to make enough time to go to a public access point (e.g. library) read and review on-line. As this is complicated, that means they would need to find many days to work on the review.

From the very beginning, constituents requested a paper or PDF version for those who cannot use or understand the on-line version. Some people are simply more comfortable with reading the plan in a more typical format. As recently as May 31 at a forum hosted by Council Member Gordon, the question was raised about when a paper version would be available and the response was that it was still in the works. Then sometime in June, Minneapolis quietly posted a PDF version via a small link in the upper corner of the Minneapolis 2040 home page. Even with finally posting a PDF, the lack of communication and outreach around this new

option along with no extension in the public comment window, still means that those without robust at home on-line access have been excluded from this process.

(2) We are finding that even for experienced computer users with high speed access, navigating the Plan and trying to figure out the linkages and potential effects between all the scattered pieces has been very hard. The layout does not read easily as an interconnected whole. We in the neighborhoods understand that everything interacts and one part will affect another. This Plan seems deliberately designed to mask that interconnectedness. You have to constantly move around and try to connect the pieces yourself to build a picture of what this Plan might actually mean upon implantation. The unintended consequences in this Plan are scary, buried deep, have not been properly assessed and need more time to review and discuss.

(3) There is no place to see ‘what will this mean for my neighborhood’. From the perspective of constituents, every issue is local yet this Plan seems to disregard the individuality of neighborhoods. The proposed changes will affect each neighborhood differently depending on where the community is located, its population, its issues and its economics.

The one-size-fits-all quality of the Plan and lack of assessments addressing unique aspects of each community make it difficult to review the Plan from a neighborhood perspective. In addition, neighborhood approved Small Area Plans are not clearly incorporated. The review process has come down to individuals trying to read a policy over here, jumping around to relate it to the language found in the Land Use and Built Forms section, looping back to the current zoning and then comparing to our recently approved Small Area Plan.

(4) While ignoring that we are a city of unique neighborhoods in the Plan language, the city still expects every neighborhood to provide the outreach and information needed for our residents to participate in the process. This includes helping them understand what this could mean for them and how they can get involved. Yet community representatives are struggling with understanding this plan and its implications. That should be of concern to anyone interested in full participation and transparency.

(5) The ability to leave comments seems fragmented and in many cases focused too heavily on single details. While having a comment possibility at the end of each policy is fine, but many commenters will want to address larger concerns (e.g. the impacts of the overall housing policies, concerns with not honoring neighborhood identity, the conflicting sections regarding automobiles and parking, etc.). It has been reported that if people send in (email, mail) comments, they are being summarized and entered into the on-line comment sections. If this is true, this is eliminating an individual’s right to full participation. If writing a full response and emailing is not going to be treated at the same level as a comment on an individual policy, that is a concern.

(6) Perhaps the most critical issue is the lack of understanding of how this plan will be implemented. In the prior Comprehensive Plan update, the language of the Plan stayed within traditional zoning code. It was therefore easier to interpret and easier to understand

its future effects. In the current draft, the City has introduced completely new language related to land management (Land Use) and property development (Built Forms) that do not directly linked to the old zoning language.

Will this Plan:

- Only ‘inform’ individual property development decisions while leaving the existing zoning codes in place – thereby opening the door to the potential of a massive amount of ‘spot rezoning’?
- Allow developers to argue for increased density for individual projects even if not specifically indicated in the Plan - as the overall plan vision is rapid, privately developed growth?
- Be used to rapidly ‘up-zone’ a massive number of private properties under the existing zoning code (without owner’s permission) using the new maps and new Land Use and Built Form language by mapping proposed usages back to the ‘best’ fit under the existing zoning code. This potentially opens many properties to development options under the existing zoning code without even the small possible benefits that might be available with the Built Form restrictions.
- Be used to rewrite the Minneapolis Zoning Code using the new language and new concepts?

By not having the implementation strategy clearing defined as part of the Plan’s review process, the City is having a dishonest dialogue with its constituents. Depending on the model of implementation, these are three completely different discussions.

We are proposing as resolutions to our concerns the following.

- **Participants design participation** - Public participation seeks input from participants in designing how they participate.

(A) There are some tools that could have been built into the on-line version that would have helped with the on-line review, but realistically, it is probably too late to make any needed changes. With the PDF finally posted, that helps with some of the accessibility concerns, but the effect of this has already been significant disenfranchisement for much of the public comment window.

The remediation for this would be to extend the public comment window by the same number of days that the PDF was not available and to aggressively advertise the availability of the PDF. In addition, printed versions should be sent to logical outlets – libraries, parks, agencies, neighborhood organizations, etc. - who could make them available for public review.

- **Adequate information** - Public participation provides participants with the information they need to participate in a meaningful way.

(B) Honor neighborhood's role in communicating the Plan to their residents by developing neighborhood 'profile' pages. These would be a synopsis of what policies directly affect the designated community. They should include a three-part comparison of the neighborhood's current zoning map and definitions, their small-area plan map and definitions and the proposed Land Use and Built Form map with definitions so the changes are clear and transparent.

Items to include in the synopsis: basics demographic statistics so communities have information on their current residential housing and business status, current population, income, diversity make-up, agencies, schools, parks, and other relevant information. Any other information on park/green-space versus current population, parking/transportation studies, density indicators, employment options, pollution issues or other items relevant to the holistic livability of a community.

- **Contribution will be thoughtfully considered** - Public participation includes the promise that the public's contribution will be thoughtfully considered.
- (C) Incorporate additional ways to add comments not only at the policy level but also at the Topic Level or the level of the full Plan that does not get summarized by a third party. Guarantee comments sent via other means than the on-line comment boxes are fully incorporated.
- **Seek out involvement** - Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision.
- (D) With the high possibility of unintended consequences and the difficulty of reviewers to link the various elements of the plan, it is incumbent on the city to provide venues for reviewers to discuss and clarify questions. The city needs to host targeted question and answer sessions.
- **Known effect of participation** - Public participation communicates to participants how their input affected the decision.
- (E) Before continuing, the implementation proposal for the Plan must be clearly defined and should be its own topic for public debate. If the Plan is going to be used to rewrite the Minneapolis Zoning Code, then logically this is the draft for new the zoning code. By not being clear, it becomes a backdoor way to rewrite the Minneapolis Zoning Code without being upfront and fair to the public.

Engaging the community - All have a voice and are heard

This is such a major undertaking that we must reiterate that the difficulties with this review process warrant extending the public comment window along with the implementation of the above recommendations. The city must work to assure as many people as possible; (1) understand the plan and its implications, (2) have an opportunity to have questions addressed and (3) have comments that will be heard.

We expect the City of Minneapolis and the Neighborhood and Community Relations department to live up to its stated standards where they have acknowledged it is:

“...the right of residents to have a say and to get involved in the business of government. The City recognizes that the community is a valuable source of expertise to influence government decisions...”

The Minneapolis 2040 Plan has the power reshape whole communities and impact city residents for decades to come. The potential of this Plan reaches a level and scope for drastic change not seen since the Urban Renewal bulldozers of the 1950’s, 60’ and 70’s. History shows us the damage that type of rapid and ‘forced from outside’ change can do to whole communities and whole groups of people.

This Plan takes the city down an unknown path and assumes unproven outcomes without escape clauses for unintended consequences. Trust your constituency; give us the time needed, open up the dialogue and create the opportunity for some real mutual brainstorming on issues of concern to all of us. **Together we can plan for the future of Minneapolis.**

Sincerely



Karl Smith
President, SECIA

Approved by the SECIA Board July 3, 2018

- c. University District Alliance (UDA)
Minneapolis Neighborhood Organizations
Jacob Frey, Mayor