

Hayes, Kathy

From: Kay Escarda [k.escarda@sbcglobal.net]

Sent: Thursday, July 12, 2012 10:02 AM

To: Hayes, Kathy

Subject: BOS 7-16-12GPU Comments

Attachments: BOS 7-16-12GPU Comments.doc

Kathy,

Please forward this to the Board, M. Spencer and T. Hofweber. Thank you. K

The League of Women Voters sent a letter dated 6/26/12 in response to Supervisor Lovelace's request at the 6/25 meeting that Key List items be more specific. Since some of our concerns have no "number", we're still not sure they are on the list.

To ensure our concerns didn't get lost in the volumn of materials you received, I've attached our previous letter for a quick review. Obviously, we cannot address all these concerns in 3 minutes.

We appreciate your consideration and look forward to the discussion. Thanks, K

7/12/2012

June, 26, 2012

To: Virginia Bass, Chair
Board of Supervisors
825 5th Street
Eureka, California 95501

From: The League of Women Voters of Humboldt County

Re: Public Participation Policy in the General Plan Update

The League of Women Voters believes that democratic government depends upon informed and active participation at all levels of government. The League further believes that governmental bodies must protect the citizen's right to know by giving adequate notice of proposed actions, holding open meetings and making public records accessible.

The League expressed our concerns about the absence of a comprehensive public participation policy in the draft housing element in letters dated 8/12/09 and 3/ 21/10. Then, after reviewing the Draft General Plan Update and finding public participation reduced to one paragraph, we submitted a letter dated 11/17/11, and specific recommendations at the request of Commissioner Faust on 12/15/11.

The League appreciates that many of our comments were positively received and incorporated into the Final Draft GPU. Because the Draft was completed two days earlier than announced, the comments we had prepared were not considered by the Planning Commission. We have now reviewed the final document and offer these comments not addressed by the staff or that we wish to emphasize.

We note that staff did not combine Chapters 1, 2 and 3. We thought from conversation with staff and the PC meeting that that was to be done. We contend that ordinary users of the GP look up **the section** they are interested in (for example, Land Use Classifications) and do not start with reading Chapters 1, 2, and 3. One introductory chapter might be less daunting. Further, the document has a very complicated numbering system. Perhaps combining the three would have called for tedious renumbering of all chapters. However, we renew the League's request for a comprehensive **Table of Contents** and a complete **Index for a more usable document**.

Since the first three chapters have not been combined, we also renew our request to reference **where** the now more visible **Guiding Principles** may be found. For example, **GP-P8**, (Part 1. Chapter 3, Governance) **Required Findings and Criteria for Amendments, letter E**. says a proposed amendment must be consistent with the Guiding Principles but doesn't indicate what those are or where they can be found. It also is confusing that there are **two** (2) GP-P8's. The second GP-P8 is in Part 2, Chapter 4, Land Use Element and refers to Urban Expansion Areas.

Chapter 2. We request the statement that the Housing Element is now a stand-alone document be added to Part.2 – Building Communities.

Chapter 8. Housing Element Summary is listed in the Table of Contents as 8.1. However, there is no reference to Chapter 8 in the GP document; it skips from Chapter 7, Table 7-B to Chapter 9, Economic Development Element. There is no Summary and no reference that the Housing Element is a stand-alone document or where it can be found.

Chapter 3. GP-P4 The Community Services Role should have a fuller description concerning the relationship to the Board of Supervisors, Planning Commission, and the public. It describes only their role regarding implementation. Their role in any future General Plan Update should be part of that description.

GP-P7, and IM-3. The League is pleased that GP-P7, Periodic Review, was strengthened and that **GP-S5**, Planning Advisory Committees, was **added**. We remain concerned that the language says PAC's **may** (emphasis added) be created. We believe this is the crux of public participation. Early input diminishes distrust and dissatisfaction regarding concerns adequately being heard. Over and over, we have heard that three minutes to **respond** to multiple concerns to staff generated submissions was not considered meaningful participation for the public. While GP-IM5 addresses Meaningful Participation, the League is concerned that unless IM3 is strengthened, public participation will be lost in future Update periodic reviews.

GP-IM1 Progress Reports. The League believes implementation measures should be specific. While the code number is cited, there should be a time specified so the Board, the Planning Commission, staff and the public can know when, and if, the procedure is being followed.

GP-IM5 Meaningful Participation. This is more of a policy statement. Implementation should reference which County Code and which State law applies. Even though the content of the law may change, citizens have a right to know what codes and laws apply to the process. There is a lot of latitude in the words "whenever possible".

GP-IM13 Customer Service Training and Satisfaction. The word "will" was changed to "should". We agree costs are a consideration for training. However, evaluation sheets can be used at the counter for customer service and at public workshops and meetings. We believe it is appropriate to have that evaluation made at least annually.

GP-IM16. Citizen Handbook. The League is pleased that this item was added back into the document. Since the Plan is complicated and citizens researching a particular concern may not read the first three chapters, a handbook describing how citizens can be involved in the process should be beneficial to both the department and the citizenry. The League has offered to help make this available to the public.

Nancy Nieboer, PhD, President

Kay Escarda, Action Chair