

July 13, 2012

Humboldt County Board of Supervisors
Humboldt County Courthouse
Eureka, CA 95501

Re: July 16, 2012 GPU Key Issues Additional Input

With regard to Table 1. of the June 28 Staff Report on Key Issues, the PPWG appreciate the Priority 2 designations for our short list items.

With regard to those item notes on "...adding clarifying text to this section may be appropriate.", we would prefer to work collaboratively with staff on the clarification of those items the Board of Supervisors is supportive of, but may be too unwieldy to easily handle in Board session.

#1 Guiding Principles:

The Guiding Principles contained in Chapter one of the General Plan update. are in effect major plan policies, as indicated in the Framework Plan and revealed by staff at the December 15, 2011 Planning Commission "workshop" for Chapters One , Two and Three.

The Guiding Principle polices should of, but did not receive the same treatment as the other policies. They were not included in Key Issues and Alternative Charts for proper review by the Planning Commission and the public. Instead these major plan policies (apparently devised 11 years ago) were discretely placed in Chapter One, under a title "Guiding Principles" where there had been no plan for review.

The Guiding Principles need proper review accorded to other plan policies, which has NOT happened.

GPU 1.4 Guiding Principles. (page 1-3) There is a perceptible inconsistency with regard to the description and definitions of the Guiding Principles.

The text states "Guiding Principles ... provide a statement of community values and overall objectives of the General Plan." That "a principle is an assumption, fundamental rule, or doctrine ..." Then, "Principles are based upon community values, planning doctrine, current technology, and the general plan's objectives". Finally, "*The Guiding Principles are the direct result of the public process involved in developing this GP*" (Objectivity requires that the undefined "public process involved" requires description and quantification to establish the veracity of the reference, both of which are not to be found anywhere in the text). Further, this final assertion is questionable inasmuch as these principles were developed 11 years ago at which time the review process that was being used was closed to the general public participation and failed to consider public participation as a community value worthy of mentioning, particularly in the face of the unmentioned applicability of multiple unequivocal provisions of Section 1500 FMWK Plan.

The failure to include public participation in the Principles until the last minute belies

the fact that the general public was not truly involved in the development of these principles until 6 months ago at which time the omission was realized and 3 additional principles (1, 11, & 12) were adopted too late to be fully realized.

1 (PPWG 7-13-12)

The Principles are in fact major plan policies and objectives that have been shielded from the alternatives chart process applied to all other plan goals, policies, standards and implementations.

Therefore, the statement that the Guiding Principles are the direct result of the public process cannot be accurate. It appears that community values have taken a back seat to unidentified and undefined "assumptions" and "planning doctrine" which have not been exposed to public scrutiny.

Recommend: Include a definition of the meaning of the terms assumptions; and planning doctrine" **Define and list them.**

Proposed additional Guiding Principle:

Encourage experimentation with innovative technologies and minimum impact low consumption alternative lifestyles that minimize consumption of resources and reduce the overall carbon footprint.

#2 The following was compiled with the help of Connie Stewart in effort to help consolidate and add clarifying text in proper locations regarding PPWG 7-16-12 short list items #5, #7-c, #8, #9-a, #10,

Under **Public Participation** stating at the very end on 3.3 we would like you to consider the follow changes:

In addition it important for county to recognize the need for using technology to allow interactive public participation involvement to our citizen who live in outlying areas or may have difficulties attending meetings.

The follow interactive tools should be considered for use by county staff and decision makers to allow equal participation throughout the region regardless of a citizens' ability to attend meeting in person:

Teleconferencing

Webinars

Audio meetings

Technology to allow for interactive meetings is advancing and will greatly improve during the life of this general plan. The county should make every effort to use technology to improve public participation in the planning process.

Please also consider the following changes under **Goals and Policies** starting on page 3-8:*

GP-G3. Public Participation. An open, inclusive, interactive and responsive process for public participation in County land use decision making and greater understanding of the Plan

Gp-Gx1. Accessible General Plan. A comprehensive General Plan written in understandable language and format which is readily accessible to the public and encourages citizen participation throughout the planning process in the geographic area under consideration,

2 (PPWG 7-13-12)

GP-P10 Public Participation; add item I

I. Interactive Real Time Technology. The County shall encourage the use of technology to allow real-time remote interactive public participation in the planning process.

#3 Please also consider the following changes under **Implementation Measures** starting on 3-15.*

GP-IM5 Meaningful Public Participation. Comprehensively review and update the participation required by the County Code to provide adequate time, information, and means of input to ensure early and meaningful community involvement in planning projects as required by state law. ~~Whenever possible,~~ public input sessions for county-initiated legislative changes should be formatted in such a way as to encourage meaningful participation and be held in the geographical areas under consideration. Provide interactive live remote, ~~whenever possible,~~

New items: AMENDMENTS (pg 3-2) Clarification and consistency needed.

#19 Comment: Last sentence of the second paragraph needs clarification: "As a "constitution" for future development, some aspects should be considered foundational and not subject to interim change".

Recommend: Include a definition of the meaning of the term "foundational aspects". **Define and list them.**

#20 Comment: Last paragraph page 3-2: "...the Plan can only be amended when it benefits the entire county". Clarification is needed for the benefit of the general public as to who and how is a finding of "benefit to the entire county" verified?

Recommend: Clarification is needed in the text narrative to clarify and more fully explain how a determination of **benefit to the entire county** is made? Such an extraordinary standard appears more unachievable than the standard of "**community consensus**" set by the Framework Plan.

We are prepared to answer any questions which you may have for us regarding the contents of our submission for your consideration.

Sincerely,

Members of the Public Participation Work Group (PPWG)

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Civil Liberties Monitoring Project (CLMP)

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