

February 15, 2010

Ms. Lynn Jacobs, Director
California Department of Housing & Community Development (HCD)
1800 Third Street, Suite 430
Sacramento, California 95814

Re: Humboldt County Housing Element: Missing Public Participation Policy

Dear Ms. Jacobs:

I appreciate the diligence of HCD in (appropriately) returning the draft housing element to Humboldt County for necessary additional work.

As a 20 year veteran of several former Humboldt County Housing Element Citizen Advisory Committees (CACs) involved in processing the 1979-81, 1985, 1992, 1995 and 1998 Housing Element updates, I am compelled to submit the following observations of then and now in the update process. The Housing Element CACs were all broad based 15 to 21 member Board appointed committees. Those citizen committees were consistently successful in helping deliver HCD approved documents. Meetings were general public open forum inclusive, collegial, and focused on identifying and addressing **all** county housing problems, and not just the concerns of stake holder groups. I do not recall any housing element updates utilizing CACs ever having been mired down with the ongoing controversies that attend the current rewrite.

By comparison, the last two housing element cycles have been without the benefit of CACs. Reportedly, staff had decided that by-passing the CACs would improve the process and would bring about completion of planning tasks more quickly and efficiently. That departure from public participation policy is yielding substandard results. "Governmental constraints" to housing have proliferated, whereas continuity with traditional public participation policy, apparently perceived by staff as a constraint to expediency, is preemptively obliterated. Long standing inclusive policies and programs are discarded without public due process or comment.

Former controversial issues had been successfully mitigated through the CAC public discussion consensus workshop approach. In the absence of this mediating mechanism, the Board and Commissioners, with very large workloads to manage, are too overwhelmed to untangle the unwieldy mess of unresolved controversies. This method serves more to divide rather than unify the community.

The three minute public comment periods before the Commission or the Board do not qualitatively service the intent nor spirit of "public participation" and "public education" as promoted by HCD and OPR (Office of Planning and Research). "**Participation**" means very

much more than mere “**comment**”. It is disturbing to witness the growing community disorientation, distrust and frustrations consequent to the limitations on public access.

All preexisting public participation policies have been removed from the August 2009 draft Housing Element. Although Appendix A asserts that “*County policies on public participation are embodied in the County General Plan Section(§) 1500..*”, this statement is disingenuous. The draft General Plan Update (GPU) document released nine months earlier, foretells the nullification of all the §1500’s provisions for public participation. So, the comprehensive §1500 has been “pre-superseded” with a few draft platitudes. Planning staff has already implemented their draft anticipation of eliminating §1500, which is inconsistent and at odds with the applicability of the repressed §1500, which actually remains the county’s extant ruling authority.

In summary, I respectfully request (urge) that you send your strongest message to Humboldt County insisting on the restoration and promulgation of former public education and participation policies and programs. Revitalize the policies and programs upon which prior housing elements were produced with community support and successfully approved by HCD for two decades.

If you have any questions please feel free to contact me.

Respectfully,

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Attachments: Public Participation Policy Chart
Bibliography of References

cc Kathy Hayes, Clerk of the Board
Planning Commissioners
Board of Supervisors
Philip Smith-Hanes, County Administrative Officer
Kirk A. Girard, Community Development Services Director
Michael Richardson, Senior Planner
League of Women Voters of Humboldt County
Civil Liberties Monitoring Project
United Stand Humboldt
Humboldt Human Rights Commission
Humboldt Tax Payers League
Humboldt Grand Jury