



## La Jolla Community Planning Association

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Hon. Joe La Cava, Council District 1  
City Administration Building, 10<sup>th</sup> Floor  
202 C Street  
San Diego, CA 92101

December 28, 2021

Dear Councilmember La Cava,

At its December 2, 2021 meeting, the La Jolla Community Planning Association (LJ CPA) discussed the proposed "reform" of Planning Groups. The LJ CPA understands the need for planning groups to align with the City Charter; consequently, we support legal consistency. We also agree that public transparency and community inclusivity are fundamental to our mission. Nonetheless, we think the current proposal goes far beyond what is reasonably required by State law. Furthermore, we are highly concerned that the proposal will have serious foreseeable consequences. Due to the burdensome costs of the new requirements, planning groups in lower socio-economic neighborhoods, which are least able to comply, will be disproportionately affected.

The most objectionable provisions are:

**Withdrawal of city support.** By no longer providing public meeting spaces, yearly stipends for expenses, Planning staff assistance, and fee waivers for appeals, the entire cost of planning groups is now shifted to its members. However, unlike most private membership organizations, no dues, donations or solicitations can be required of members due to Brown Act restrictions. So, PG's are in a Catch-22: they are "independent" of the City, yet cannot act "independently" to raise money in support of their activities due to legal restrictions. Planning Groups in communities with limited resources will be most negatively affected by these changes, thus undermining the goal of increasing their participation.

**New requirements that increase Planning Group workload.** These include submitting new bylaws that create new operation procedures, new election procedures, new ethical standards, and new community participation and representation plans. Furthermore, current bylaws shells and administrative guidelines are terminated, while no new templates for these required documents are available. Whether revised documents meet new--and as yet undefined--city certification standards is unknown. Planning Groups are comprised of VOLUNTEERS. None have paid staff. This is a huge work

load to expect of individuals with work and family obligations. If younger and more diverse membership is desirable, additional workload is NOT the way to achieve it.

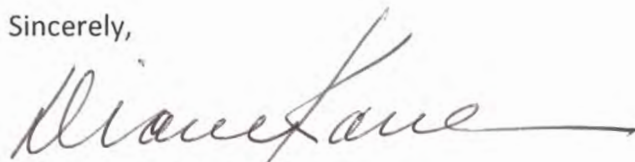
**No control over membership.** Declaring “everyone” who resides in a community as a “member” of a Planning Group creates an administrative nightmare for Planning Groups. Demographic data collection and reporting requirements to show “best efforts” at community outreach (especially renters), is exceptionally burdensome for a small volunteer organization like the La Jolla CPA. Additional outreach, such as social media, blanket mailings, flyers and in- person contact, turns Planning Groups into unpaid public relations consultants for the City’s planning participation requirements. Not knowing who your members are, and allowing anyone who randomly appears at a meeting to vote on Trustee representation, is a recipe for anarchy, not democracy.

**A “Done Deal.”** Unilaterally separating Planning Groups from the City without engaging them in a democratic problem-solving process is an affront to hundreds of volunteers who have devoted thousands of hours of service towards the betterment of their communities. Requiring those whose terms have ended to refrain from re-election for two years--where a one-year hiatus for other politically-related offices is the norm--is arbitrary, punitive and discriminatory. Removing special status for Planning Groups from the Municipal Code and from the project review process undercuts the community service incentive for most volunteers. If City protection from legal liability also evaporates, there will be few who will wish to engage with City processes under any circumstances.

In short, diminishing Planning Group power while increasing their costs and workload is a lose-lose proposition. Not only will the City fail to engage new volunteers from under-represented groups, the City will collapse the existing community participation structure. This would be a tragedy. Since the mid-1970’s, when the City Council adopted Policy 600-24, Planning Groups have provided essential, first-hand community input to the City on land-use issues from the people most directly affected—the residents themselves.

The La Jolla Community Planning Association strongly opposes this approach and recommends that it be scrapped. Instead, we support deeper exploration of other avenues. These could include an amendment to the City Charter with Planning Group, City Attorney and Council collaboration.

Sincerely,



Diane Kane, President

La Jolla Community Planning Association

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