

As Palo Alto citizens, we are appalled by Council's blanket removal or even separation of the Programs from the body of the draft Comprehensive Plan. As CAC members, we are deeply offended.

TRUST

The city told the community the Comp Plan was very important. Citizens and stakeholders were asked to sacrifice their time and invest their energy beginning with the "Our Palo Alto 2030" process so that their interests were fully represented. Citizens and stakeholders did so, by the hundreds.

The city tasked the CAC with the work of reviewing that input and striking a balance among competing interests to produce a Comprehensive Plan. The CAC has done that through 20 months of difficult and often contentious effort.

Council asked that the Plan be developed in an Element - Vision - Goals - Policies - Programs fashion. Frequently Vision and Goals were dictated by Council. That process placed Programs throughout the Comp Plan as integral and fundamental to the desired balance. In many cases, Program inclusion was the lynchpin to achieve agreement and consensus. Several Policies were designed with the expectation that the *Programs* would provide necessary detail and clarity. Without adoption of that context, staff, Council, and most importantly the community, can only speculate as to the meaning or implications of those Policies. To suggest that the Policies, taken alone, could represent CAC intentions and consensus is inaccurate and misleading.

Council's blanket approach to the Land Use and Transportation Programs belittles the effort, subverts the balance and invalidates the consensus. This is not a mere formatting change, nor can it accurately be described as "accept[ing] strong consensus where it existed."

In the name of Council flexibility, Council has damaged public trust and undermined the very work enabling them to earn it.

SPECIFICS MATTER IN A COMPREHENSIVE PLAN

Substantively, a Comprehensive Plan without Programs is barely a "Plan" at all. Yes, several Policies in the draft Comp Plan include specifics, but for many, the Programs provide important clarity about what is intended. The Comprehensive Plan must offer sufficient specifics to be actionable and for staff, Council and citizens to *know what the plan is* and get on board. The Programs inform the public what to expect and allow them to hold the city accountable - these are the keys to public trust.

In fact, the existing Comp Plan clearly states that the "Implementation Chapter is not a Plan Element," nor is an appendix. Thus, Programs located in an un-adopted chapter or appendix carry no authority for (or expectation of) action. Council has rendered them largely irrelevant.

It is also argued that because the Council chose to simplify the S/CAP by removing action items from the body of that plan, it would be equally appropriate to do so with the Comp Plan. Unlike the S/CAP, however, the Comprehensive Plan provides the underpinning for **all** city action. It is State-mandated and has much more comprehensive impacts than the S/CAP. Nonetheless, even for the S/CAP, the removal of all proposed action items from the body of the Plan necessitated substantial modification and expansion of the Goals and Policies in several sections. Council proposed no such revisions for the draft Comp Plan.

A COMP PLAN WITHOUT PROGRAMS IS *LESS* NIMBLE

Programs adopted in a Comprehensive Plan provide direction for city staff to pursue specific efforts without undergoing an additional, lengthy legislative process. They are what makes the Plan readily actionable. According to the State's General Plan Guidelines, adopted Comp Plan Programs provide a short term mechanism for the city to "quickly respond to the demands of new funding sources, the results of their own activities, and the jurisdiction's immediate needs and problems."

By eliminating authorization for any Programs, in the name of simplicity and flexibility, Council's action actually created a significant barrier to implementation. Now, before any Program can be implemented, the city staff or Council leadership must bring it forward to be taken up by the full Council.

Several high-priority Programs may well successfully compete for limited Council time. But where the Program is non-controversial or doesn't require specific budget authorization, that legislative time is wasted and only delays implementation. The bulk of the CAC recommended Programs do not merit individualized legislative attention, but are nonetheless very important to the community. They are recommended for adoption in the Comp Plan to reflect that importance and enable staff implementation in an efficient manner. Requiring further Council review in order to act creates a significant burden on both staff and Council.

With a poorly considered action, Council has:

- 1. Threatened public trust;**
- 2. Destroyed hard-earned consensus;**
- 3. Undermined the contextual cohesion of the Plan;**
- 4. Removed Plan transparency; and**
- 5. Hindered the City's flexibility to act.**

We recommend reconsideration by Council and a unified voice of concern from the CAC.