



To: The New Orleans City Planning Commission  
1300 Perdido Street, Rm. 1E07  
New Orleans, LA 70112

January 26, 2012

Dear Esteemed Commissioners:

As the founder, director, and leading advocate for the transparency, accountability, and citizen participation recommendations described by the NolaStat reform, and through a variety of interactions with a broad constituency of the city, I have become keenly aware of the need for a citizen participation process to provide opportunity for early notification and comment on land use and other planning considerations in the city of New Orleans.

There are fundamental values that must be respected for any meaningful citizen participation process to function well and be accepted by the community. Among these: 1) It must reflect and express the desires of the community it serves; 2) There must be a fair opportunity for all to join recognized organizations in order to participate in comment and decision processes; 3) There must be autonomy from city officials in the process of arriving at consensus on planning decisions.

The language in the proposed Master Plan text Amendment #19, to create a "Neighborhood Participation Plan" (NPP) located in the Mayor's Neighborhood Engagement Office (NEO), violates the fundamental pre-requisite of autonomy from the influence of city officials. In deleting the language calling for the formation of "district councils," and replacing this model with an agency controlled by the Mayor's office, the City Planning Commission would create an opening for any mayor to choose how and with whom to engage in planning decisions, or to not engage at all, and leaves open the continuing possibility of political influence being used to unfairly manipulate planning decisions. As such, the City Planning Commission should oppose Master Plan Amendment #19.

Citizens may hope that all mayors would objectively and fairly seek to engage citizens in planning processes, but many citizens have fair reason to cynically point to engagement failures in the recent past of Katrina recovery, and there is a long history of surprise land use decisions made through asymmetrical access to the decision-making process by developers who have failed to seek consent, or who have been misled to think that they have consent.

There may be many models that satisfy the fundamental autonomy required for a meaningful citizen participation process, of which district councils are perhaps the best researched locally. Unequivocally, there has not been a proper period of time allowed to deliberate upon how the city should implement the citizen desires expressed in the Master Plan, including the merits of district councils or other models for citizen participation. As of the date of this letter, in fact, notes from the CPC Master Plan neighborhood participation meeting that occurred in December still have not been distributed to



participants. Therefore, one could only conclude that Amendment #19 altering the already-approved Master Plan seems a hastily-prepared, ill-planned, and ill-conceived proposal.

The entire purpose of the Master Plan process was to memorialize the desires of the community in a document including, very high on the list, citizen participation shaped by a process that the community itself can own and govern. In modeling NEO as a formalized entity governing the process of citizen participation, any mayor will have the power to weaken citizen participation without the consent of citizens. As citizens know from the Katrina recovery experience, the interval between elections is not short enough to address concerns about inclusion in planning decisions should citizens choose the ballot box to show their discontent with a mayor. A great amount of harm to the long-term interests of both citizens and developers can be done by not seeking the consent of citizens through a formalized participation process that respects autonomy.

It's also perhaps worth noting the irony of the language justifying the amendment, in which it's stated that the text of the Master Plan "should not recommend that the City adopt a particular type of system," and yet, the formalization of NEO as the vehicle for citizen participation is itself "a particular type of system," but not one over which citizens have any control or autonomy (Preliminary Staff Report, 2011 Master Plan Proposed Amendments, Jan. 10, 2012, p. 54, <http://ow.ly/8HJbR>). The amendment also argues that NPP adheres to the core principles of "inclusiveness, public access to information, capacity, structure and transparency from a broader city government lens" -- goals which should always be expected of any public institution. In fact, citizens should expect any mayor's active interest in citizen engagement, and facilitation of a formalized citizen participation process, without codifying in the Master Plan that engagement in an agency controlled by the mayor. If district councils shouldn't be codified as a formalized citizen participation model, as is argued in the proposed amendment, then neither should NEO.

I strongly recommend that the City Planning Commission vote against Amendment #19, but that it instead commit to exercising its resources in the task of identifying a model for citizen participation which satisfies the need for autonomy, and that it express its support for the Mayor's office to actively pursue an interest in citizen engagement, as should be expected in any event, without codification, of a mayor who has sought to represent citizens in a democratic society.

Respectfully,

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